Pensions Dashboards 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 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, this guide helps you do that. It sets out the necessary actions and decisions and we make recommendations on timings based on the 'connect by' date of 31 October 2025. These are detailed throughout the guide and summarised in the 'Preparing to connect 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 the majority of pension schemes and public service pension schemes. The regulations confirm that schemes must connect to the ecosystem by the 'connection deadline' 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. 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 dashboards initial guidance.](#)

TPR publishes guidance and 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, a checklist, 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 values data sub-group. The objective of the PDWG and its sub-groups is to provide support and input to 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

- as soon as possible (ASAP) and ongoing, sign up for online news alerts on dashboards
- ASAP and ongoing, keep up to date with the latest information and developments on dashboards
- ASAP and ongoing, discuss dashboards implementation 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.

Governance action

- ASAP and ongoing, make sure dashboards are a standing agenda item at your pensions committee and local pension board meeting
- ASAP and ongoing, 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 record keeping page
- PASA dashboards guidance page
- LGA AVCs and Dashboards administrator guide

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

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

Internal controls action

- ASAP and ongoing, incorporate dashboards data requirements into your wider data management plan including your approach to cleansing, digital accessibility and reconciling your AVC data

- ASAP and ongoing, regularly review your wider data management plan to determine where you are at.
- maintain your plan(s) on an ongoing basis once dashboards are live after 31 October 2025.

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.

These records will help provide TPR with a rounded and transparent view of your efforts to comply with legislation.

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

- ASAP set up your internal controls register to implement dashboards.

8.   Dashboards available point (DAP)

More information can be found in [PDP introduction to the DAP](#).

The DAP is the point at which dashboards will made available to the public. This will only happen when a number of requirements have been reviewed by the Minster for Pensions. These are:

- sufficient coverage
- the dashboards 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.

Our current expectation is there will be a single launch point when dashboards will be made available to the public.

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 dashboards initial guidance](#)
- [PDP dashboards connection hub:](#)
- [PASA dashboards guidance page](#)

'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 are able to 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.

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 taken into account 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

- ASAP 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

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

Record keeping action

- ASAP 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.

You will then need to contact PDP notifying them of your new connection plan and to agree a new 'connect by' date. Your ISP may be able to act on your behalf when contacting PDP.

PDP will then inform TPR once a revised 'connect by' date has been agreed and TPR will update their systems. Until that happens, TPR will continue to communicate with you based on your 'connect by' date of 31 October 2025.

If you want to change your 'connect by' date before PDP publish their guidance, you will need to email PDP with your new connection plan at supportpdp@maps.org.uk.

However, it is likely you will need to re-submit your request once PDP's guidance is published.

This process will be clarified by PDP when they publish their guidance on changing 'connect by' dates – expected later in 2024. We will update this guide once the process is finalised.

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 the process above and inform PDP by 31 December 2024
- upon receipt of confirmation from PDP your 'connect by' date has been changed inform all relevant stakeholders of your new date.

Record keeping action

- by 1 April 2025 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
- by 1 April 2025 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 keep a record of your new 'connect by' date.

10. Registering with MaPS

More information can be found in:

- [TPR dashboards initial guidance](#)
- [PDP connection hub](#)
- PDP online connection hub: to be confirmed

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.

PDP are developing an online connection hub which will explain how and when you or your ISP can register. The online connection hub is expected to be launched early in 2025.

Connection action

- register with the MaPS governance register by way of PDP online by the date specified in PDP online 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

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

Record keeping action

- ASAP 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 dashboards initial guidance
- PDP dashboards connection hub
- PASA dashboards guidance page
- National LGPS frameworks homepage
- LGPS AVCs and Dashboards administrator guide

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.

This is the second iteration of the Member Data Services Procurement Framework, now 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 call 01603 306846 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

- ASAP decide your route to connection – either directly or using an ISP
- ASAP choose your ISP
- by 31 October 2024 enter into negotiations and contractually engage your ISP.

Internal controls action

- on an ongoing basis make sure your ISP is on track to connect you to dashboards by your connection date and in accordance with your staging timeline.

Record keeping action

- ASAP keep a record of how you decided your route to connection
- ASAP keep a record of how you chose your ISP and the parties you communicated with in doing so
- ASAP keep a record of how you decided what resource you will need and the parties you communicated with in doing so.

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 users 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 dashboards initial guidance](#)
- [TPR compliance and enforcement policyPDP data standards](#)
- [PDP guidance on consumer protection](#)
- [PASA dashboards guidance page](#)
- [LGPS AVCs and Dashboards administrator guide](#)

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 34 to 37 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 PASA 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.

You need to decide on your matching criteria for a:

- match
- maybe match.

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

- decide what personal data you will use to form your matching criteria for both your main scheme and AVCs by 31 October 2024
- on an ongoing basis keep the policy under review.

Record keeping action

- 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 by 31 October 2024 and ongoing
- keep a record of how you decided upon your matching criteria and the parties you communicated with in doing so by 31 October 2024 and ongoing.

Governance action

- produce or update your DPIA to take account of your matching criteria policy decision by 31 October 2024.

Internal controls action

- ASAP assess the quality of the data you plan to use in your matching criteria – is it accurate and digitally accessible?
- ASAP create a data improvement plan if necessary
- regularly review your plan to make sure improvements have taken place
- on an ongoing basis 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 dashboards initial guidance](#)
- [PDP dashboards data standards page](#)
- [PASA dashboards guidance page](#)

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. Each of these is 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 raises a 'maybe match', 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

- ASAP 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. 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.

Policy decision

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

Internal controls actions

Action – multiple source

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

Action – single source

- confirm you can store your AVC view data in a digitally accessible mode by 31 October 2024
- agree the method your AVC provider(s) will use to securely send your view data and the frequency by 31 October 2024.

16. The data you must provide to the ecosystem

More information can be found in:

- [TPR dashboards initial guidance](#)
- [TPR assess whether to report a breach of the law](#)
- [PDP dashboards data standards page](#)
- [Actuarial Standard Technical Memorandum (AS TM1) latest version](#)
- [PASA dashboards guidance page](#)
- [LGPS AVCs and Dashboards administrator guide](#)

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.

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

- by 1 April 2025 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
- by 1 April 2025, 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 maybe match. 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 a match is made. 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, even if the value in the ABS was calculated more than 13 months ago, or
- a calculation performed for the member within the last 12 months, whether or not 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

ABS for the 2024/25 scheme year should reflect the LGPS McCloud remedy for affected members. How the remedy is reflected will not be 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 a number of 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.

PASA has produced Values guidance to help you make those decisions. The table in [appendix two](#) has a checklist for you to complete.

Data action

- complete the values data check list in appendix two by 1 April 2025.

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, even if the value in the statement was calculated more than 13 months ago, or
- a calculation performed for the member within the last 12 months, whether or not 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 legislation prescribes the AVC illustration dates, both for accrued value data and estimated retirement income, must be the same as those used for the main scheme benefits. This might prove problematic where the main scheme ABS is out of sync with the AVC SMPI, or where the member joins the AVC Scheme sometime after joining the main scheme. We are aware the pensions industry has raised concerns with DWP about the additional burden this creates. A potential workaround for this issue is set out in the LGPS AVCs and Dashboards administrator guide. This involves using either the 'two-submission method' or the 'all-in-one submission method'. We suggest you discuss how to approach this with the provider of your ISP.

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.

TPR's view on aligning illustration dates

TPR has confirmed it will focus on behaviours or breaches they consider pose the greatest risk to a savers' ability to receive a complete and accurate picture of their pensions and will only intervene to the extent necessary to address the harm or reduce the risk. Currently, it is not clear to TPR if there is a significant risk to savers if there is no alignment of illustration dates between defined benefit and defined contributions within the same scheme. However, they are keen to understand this further through user testing. User testing will be important in identifying any challenges savers face in understanding any of the data provided to them. The standards, and if necessary, the legislative framework, may evolve to reflect learnings from users' experience.

TPR's guidance on reporting breaches contains an example where a scheme does not use the same illustration date for their AVCs as their main scheme benefits. TPR considers this to be a 'green' breach because:

> It would cause undue burden for the scheme to align the illustration date across all benefits before the scheme connects to dashboards, and it would lead to the scheme missing the connection deadline. The affected members can still access their benefit information via dashboards, and they are being alerted that the view information is for illustrative purposes. The scheme implements a plan to achieve this in a reasonable timescale. The effects of the breach were not significant.

Green breaches do not have to be reported to TPR if they are not of material significance.

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

- discuss the potential workaround for the illustration date issue with your AVC provider(s) ie use 'two-submission method' or 'all-in-one submission method' by 1 April 2025
- agree the AVC illustration date with your AVC provider(s) and where the single source approach is used inform your ISP by 1 April 2025
- 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 by 1 April 2025
- agree with your AVC provider(s) your AVC payable dates and where the single source approach is used inform your ISP by 1 April 2025.

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 your discussion with your ISP provider on how best to display your AVC illustration dates
- 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 dashboards initial guidance
- TPR compliance and enforcement policy

- [PDP data standards](#)

This section sets out the timings for providing view data following a successful or maybe match.

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 in relation to an employment. 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 an employment.

Data action

- check your pensions administration software system can send main scheme value data within the timescales set out later in this section – do this by 1 April 2025
- consider introducing monthly data contributions (MDC) for all employers to achieve the timescales set out in this section – this should be done asap
- AVCs – check your AVC provider(s) is able to facilitate the approach you adopt ie single or multiple source and provide data within the timescales set out later in this section
- where any value data is out of date or you do not have value data stored, by 1 April 2025:

  - 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
  - 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
- 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.

Match made

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. This applies even if the value in the statement was calculated more than 13 months ago, or
- a calculation performed for the member within the last 12 months, whether or not 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.

Maybe match

Following a 'maybe match' you must immediately return limited administrative data.

If a 'maybe match' turns into a 'match made', the timescales set out in the section titled Match made apply from the date the match is made.

18. Operational information and reporting

More information can be found in PDP reporting standards.

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 maybe matches
- number of maybe matches that result in a match made or no match made 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 the majority 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 be required to report on information found outside of the ecosystem, such as complaints, pensions not found.

You should discuss the operational information requirements with your ISP. 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 from the outset of implementation.

Governance action

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

Record keeping action

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

Internal controls action

- you must have risk management processes in place, including processes for monitoring the resolution of issues between the scheme and any relevant third parties
- create a plan to record the operational information
- 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's compliance and enforcement policy](#)
- [TPR's Breach of Law guidance](#)
- [PDPs dashboards consumer protection page](#)

The Pension Dashboard Regulations 2022 – 'the Regulations', sets out your pensions dashboards responsibilities. This section outlines those responsibilities and provides links to more details 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, and . 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 or not 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

- have processes in place to monitor compliance and report breaches
- regularly review the implementation of connecting to the ecosystem and determine if any breaches have occurred – report any breaches to TPR if necessary
- 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 has restarted its programme of nudge communications to in scope schemes.

You should have provided TPR with a 'key dashboards contact'. This person can expect to receive a series five emails in the run up to your 'connect by' date of 31 October 2025. For public service pension schemes the emails will commence July 2024. You can nominate further contacts from the link sent in your first nudge email.

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

In November 2024 you can expect to receive the first dashboards readiness survey from TPR. The survey covers nine key areas including awareness of duties, preparation for connection, data preparation, compliance and engagement. All responses will be kept anonymous. We strongly recommend you complete the surveys to enable TPR to create a picture of the dashboards implementation progress across the public sector.

Governance action

- ASAP make sure you have registered your 'key dashboards contact' and your nominated contacts.

21. Appendix one – preparing to connect checklist

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

The timings in this checklist are based on your 'connect by' date of 31 October 2025.

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	ASAP and ongoing	Section 4
Governance	Keep up to date with the latest information and developments	ASAP and ongoing	Section 4
Governance	Discuss dashboards implementation with your relevant stakeholders and establish if they are up to date with the latest information and developments	ASAP and ongoing	Section 4
Governance	Make sure pensions dashboards are a standing agenda item at your Pensions Committee and Local Pension Board meetings	ASAP and ongoing	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	ASAP and ongoing	Section 5
Governance action	Decide how your main scheme data will be cleansed and made digitally accessible	ASAP and ongoing	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	ASAP and ongoing	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	ASAP	Sections 6 & 7
Internal controls	Regularly review your wider data management plan to determine where you are at	Ongoing once incorporated into your plan	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	Ongoing and after 31 October 2025	Sections 6 & 7
Internal controls	Set up your internal controls register to implement dashboards	ASAP	Section 7
Connection	Make sure you and your relevant stakeholders know the 'connection deadline' and your 'connect by' dates	ASAP	Section 9
Connection	If approval to defer connection is obtained let all your relevant stakeholders know your new connection deadline	ASAP 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	ASAP after confirmation of deferral is obtained	Sections 7 & 9
Connection	Discuss changing your 'connect by' date with your ISP	31 December 2024	Section 9

Topic	Connection tasks	Due date	More information
Connection	Create a new connection plan and inform PDP that you wish to change your 'connect by' date	1 April 2025	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	1 April 2025	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 online connection hub	Section 10
Budget	Decide on your connection budget and obtain approval	ASAP	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	ASAP	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	ASAP	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	ASAP	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	ASAP	Sections 7 & 12
Connection	Choose your ISP and contractual engage them	31 October 2024	Section 12
Record keeping	Keep a record of how you choose your ISP and the parties you communicated with, in making your decision	31 October 2024	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	From appointment and ongoing	Section 12
Policy	Decide on what personal data you will use to form your matching criteria for both your main scheme and AVC	31 October 2024	Section 14
Policy	Keep your matching criteria policy under review	Ongoing	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	31 October 2024 and ongoing	Sections 7 & 14
Record keeping	Keep a record of how you decided on your matching criteria and the parties you communicated with	31 October 2024 and ongoing	Sections 7 & 14
Governance	Produce or update your Data Protection Impact Assessment to take account of your matching criteria policy decision	31 October 2024	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	ASAP	Section 14

Topic	Connection tasks	Due date	More information
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	ASAP	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	Ongoing after date plan put in place	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	Ongoing	Sections 7 & 14
Data	Understand what main scheme view data you need to return for members who access dashboards and in what timescale	ASAP	Sections 15, 16 & 17
Policy	Agree with your AVC provider(s) how your AVC view data will be sent to the ecosystem	ASAP	Sections 15 & 16
Internal controls	Multiple source Monitor your AVC provider(s) progress to connect to the ecosystem by your 'connect by' date	ASAP and ongoing	Sections 7, 12, 15, 16 & 17

Topic	Connection tasks	Due date	More information
Internal controls	Single source Confirm you can store your AVC view data in a digitally accessible mode	ASAP	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)	31 October 2024	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	1 April 2025	Section 16
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	1 April 2025	Section 16
Data	Complete the check list of decisions concerning value data in appendix two	1 April 2025	Section 16
Data	Agree the AVC illustration date with your AVC providers and where approach 2 is used inform your ISP	1 April 2025	Section 16

Topic	Connection tasks	Due date	More information
Data	Discuss the potential workaround for the illustration date issue with your AVC provider(s) ie use 'two-submission method' or 'all-in-one submission method' – by 1 April 2025	1 April 2025	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	1 April 2025	Section 16
Data	Agree with your AVC provider(s) your AVC payable dates and where approach 2 is used inform your ISP	1 April 2025	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 your discussion with your ISP on how best to display the AVC illustration date on dashboards	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
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

Topic	Connection tasks	Due date	More information
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	1 April 2025	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	1 April 2025	Section 17
Data	Consider introducing monthly data contributions (MDC) to achieve the timescales set out in this section	Ongoing	Section 17
Data	AVCs – check your AVC provider(s) is able to facilitate the approach you adopt ie single or multiple source and provide data within the statutory timescales	1 April 2025	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	1 April 2025	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	1 April 2025	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	From the outset of implementation	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	From the DAP	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	From the outset of implementation	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	From the outset of implementation	Section 7
Record keeping	You must keep clear audit trails of how you took steps to prepare to comply with your pensions dashboards duties	From the outset of implementation	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	From the outset of implementation	Throughout this guide
Record keeping	You must keep a record of compliance as set out in MaPS reporting standards	From the outset of implementation	Sections 7 & 19
Internal controls	You must have processes in place to monitor compliance and report breaches where necessary	Ongoing	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.	From the outset of implementation	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.	Once connected to the ecosystem and ongoing	Sections 7 & 19
Governance	Register your 'key dashboards contact' and your nominated contacts with TPR.	ASAP	Section 20

22. Appendix two – value data checklist

[PASA dashboards guidance page](#).

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 a number of 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 to exclude 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?	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 provider's as soon as possible. See <u>AVCs and dashboards</u> 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 from 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 you 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 positive match or from the date it is re-registered as a match made.

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 the purpose of defined benefit for 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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