



Pensions Dashboards connection guide for LGPS administering authorities

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1. Introduction

What is this guide for?

This guide helps you identify the steps you need to take to connect to pensions dashboards (hereafter called 'dashboard' or 'dashboards').

It does not duplicate published information. Rather it provides a synopsis of the topic with links to where you can find detailed information on-line. 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).

How can this guide help you?

You will need to create a project plan to implement dashboards, this guide helps you do that. It includes actions for you take, decisions for you to make, statutory timings and our recommendations on timings that are not prescribed. These are detailed throughout the guide and summarised in the 'Preparing to connect checklist' in appendix one.

The non-prescribed timings will be revised once the staging guidelines have been published by the Money and Pensions Service (MaPS). These currently reflect a guestimate staging date of a limited period between April to September 2025.

AVCs and dashboards

At its meeting of 29 September 2023, the National LGPS Technical Group agreed to form a sub-group to look at AVCs and dashboards.

The sub-group will work with all LGPS AVC providers to establish common approaches on matching and providing value data.

We will support the sub-group, which comprises representatives from software providers and administering authorities. Progress from the sub-group will be published in the National LGPS Technical Group minutes on the:

- Technical group page (England and Wales)
- Technical group page (Scotland).

Quarterly dashboards survey

Each quarter, Jayne Wiberg, on behalf of the National LGPS Technical Group, will email administering authorities with a dashboards survey. The survey gathers information about your progress in implementing dashboards.

All results are published anonymously and shared with the relevant Scheme Advisory Boards and the Pensions Regulator. You can see results of previous surveys on the:

- Technical group page (England and Wales)
- Technical group page (Scotland).

When the survey is issued, we strongly urge you to complete it so the National LGPS Technical Group, relevant Scheme Advisory Boards and the Pensions Regulator has a full picture of the dashboards implementation progress across England & Wales, Scotland and Northern Ireland.

2. Background

What are 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 be connected – to what is called 'an ecosystem'.

The ecosystem encompasses dashboards, data providers' find and view interfaces and the central digital architecture.

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 <u>Pensions Dashboards Regulations 2022</u> ('the regulations') set out in law connection and maintenance of connection, is a legal requirement for the majority of registrable pension schemes and public service pension schemes.

Initially, connection dates were set out in the regulations. Public Service Pension Schemes were originally scheduled to connect in September 2024. However, in March 2023 the programme was reset. This was to allow time to make sure resources are in place to complete the delivery of the technical solution and to provide documentation to support connection. The regulations were changed to provide those pension schemes in scope must connect to dashboards by no later than 31 October 2026. Staging dates will be set out in guidance published by MaPS. Although no timescales have been provided by when we can expect this guidance, we believe this might be in quarter one of 2024. If this changes this guide will be updated.

Despite the programme reset it is important you carry on preparing to connect. There is significant work involved to comply with your dashboards duties and you may need to engage third-party suppliers to help you with this work, such as an administrator or an integrated service provider (ISP). You should work with your advisers to assess the impact of the changes and plan how you will meet your dashboard duties.

3. Who does what

The Money and Pensions Service (MaPS)

MaPS dashboards homepage: https://www.maps.org.uk/pensions-dashboards/.

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: https://www.pensionsdashboardsprogramme.org.uk/.

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:

https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance.

TPR publishes guidance and checklists for occupational pension schemes in relation to:

- the <u>Pensions Dashboards Regulations 2022</u> ('the Regulations') as amended, made by the Department for Work and Pensions (DWP)
- the standards and guidance produced by MaPS.

TPR are also responsible for the compliance and enforcement of the regulations by occupational pension schemes. They 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 their action where they perceive the greatest risk to savers might occur.

TPR will support occupational pension schemes and those that support them through a comprehensive programme of targeted communications to drive awareness and understanding of duties, and what needs to be done to prepare – including dashboards guidance/checklist, as well as hosting and attending webinars and other industry events and 121 meeting with key stakeholders.

The Financial Conduct Authority (FCA)

FCA dashboards homepage: https://www.fca.org.uk/search-results?search term=pensions%20dashboard.

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

The Information Commissioner's Office (ICO)

ICO homepage: https://ico.org.uk/.

The ICO is the cross sector regulator for data protection legislation. 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: https://www.pasa-uk.com/dashboard/.

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 as a whole.

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 PDWG 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.

<u>Section 3 sets out 'Who does what'</u> and has links to the relevant page of each organisation. When new information is published, these pages are updated. You should regularly review these pages to keep up to date. The majority of these pages 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

- sign up for dashboard on-line news alerts
- keep up to date with the latest information and developments on dashboards
- discuss dashboards implementation with your relevant stakeholders and establish if they are up to date with the latest information and developments.

Timing

we recommend as soon as possible and ongoing.

5. Pensions Committee / Local Pension Board

It is important your pensions committee and local pension's board are kept up to date with the latest guidance and developments on dashboards. Including 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
- programme reset
- dashboards available point (DAP)
- accuracy and digital accessibility of your data
- choosing an integrated service provider (ISP)
- AVCs and dashboards
- budget
- resource.

Overtime these updates will expand. For example, they might include your decision concerning data matching, the calculation of value data and your approach to the provision of AVC value data.

Governance action

- make sure dashboards are a standing agenda item at your Pensions Committee and Local Pension Board meetings
- make sure your updates contain the latest position on dashboards both industry wide and at your administering authority.

Timing

we recommend as soon as possible and ongoing.

6. Accuracy and accessibility of data

More information can be found in:

- TPRs record keeping: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/record-keeping/what-records-to-keep
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/

Implementing dashboards does not generally need you to hold any new information for the defined benefits element of the scheme. Though it will oblige you to hold new information for AVCs where your AVC provider sends value data to you to display on dashboards – as opposed to the AVC provider sending the data directly to dashboards themselves.

You must digitally hold your pension records so they can be digitally matched and returned for display, on whichever dashboard your members choose to use.

Consequently, all value data must be accurate and digitally accessible. This includes your AVC data. This is because although your AVC data is administered by your appointed AVC provider, you are ultimately responsible for making sure this data is accurate and digitally accessible. You will need to agree with your AVC provider(s) how this data will be cleansed and matched to your 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 and matching your AVC data.

Governance action

 agree with your AVC provider(s) how your AVC value data will be cleansed and matched to your records.

Internal controls action

- incorporate dashboards data requirements into your wider data management plan including your approach to cleansing and matching your AVC data
- regularly review your wider data management plan to determine where you are at.

Timing

we recommend as soon as possible and ongoing.

7. Internal controls and record keeping

More information can be found in:

- TPRs general code of practice consultation
 <u>https://www.thepensionsregulator.gov.uk/en/document-library/consultations/new-code-of-practice</u>
- PDP reporting standards: https://www.pensionsdashboardsprogramme.org.uk/standards/reporting-standards/.

You are expected to operate internal controls in line with TPRs general code. The consultation on the new general code closed in May 2021. TPR published an interim response in August 2021 and is expected to publish the final version in 2023 / early 2024.

Internal controls

The internal controls are, though not limited to:

- reviewing and assessing the quality of both your main scheme data 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
- a record of compliance as set out in MaPS 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 matching policy and AVC matching policy
- records of the steps taken to improve your main scheme data and AVC 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

• set up your internal controls register to implement dashboards.

Timing

• we recommend by 1 April 2024.

8. Dashboards available point (DAP)

More information can be found in PDP frequently asked questions: https://www.pensionsdashboardsprogramme.org.uk/faqs/.

The DAP is the point at which dashboards go live to the user. Dashboards services will only launch to the public once 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 issue a notice six months before this date occurs.

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

9. Connecting to dashboards

More information can be found in:

- DWP and MaPS staging guidance: this link will be inserted when the staging guidance is published
- DWP guidance on deferring connection:
 https://www.gov.uk/government/publications/pensions-dashboards-guidance-on-deferred-connection
- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDP dashboards connection hub: https://www.pensionsdashboardsprogramme.org.uk/connection/
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/.

In preparing to connect to the ecosystem you need to understand by when you must do so and if you are able to defer this date.

Connection deadline and staging timeline

Unless you are able to defer your connection, you must connect to the ecosystem by 31 October 2026. This applies to both your main scheme benefits and you're AVC arrangement(s). Both arrangements must connect at the same time – even where the AVC provider has a different connection date.

You should also have regard to the staging guidance, published by the Secretary of State for Work and Pensions and MaPS. The staging guidance will contain a timeline indicating when you are scheduled to connect. This will be significantly earlier than 31 October 2026. We will update this guide with your staging timeline when the

guidance is published. The staging guidance might provide for connecting before your staging timeline. If this is the case, we will update this guide with the details.

From the outset of connection you must be able to:

- meet the required standards (connection, security and technical)
- be able to respond to find requests, complete matching and provide <u>administrative data</u>, <u>value data and contextual information</u> on request, to members accessing dashboards.

Connection action

 make sure you and your relevant stakeholders know your connection deadline and once published, your scheduled staging timeline.

Timing

we recommend within two months of when the staging guidance is published.

Deferring connection

You can apply to the Secretary of State for Work and Pensions to defer your connection date of 31 October 2026 in limited circumstances. You must do so before 9 August 2024.

If you are affected by the limited circumstances that allow you to defer connection, we suggest you discuss deferring connection with your integrated service provider (ISP) before making an application.

If you decide you wish to defer connection then follow the DWP guidance on deferred connection.

If deferral is approved, the latest date by which your deferral can be extended, is 31 October 2027, though it can be earlier. You must connect to the ecosystem by your deferred connection date. You should let all your relevant stakeholders (eg though not limited to pensions committee, local pension board, ISP, AVC provider(s)) know this new date. See section 12 'Connecting to the ecosystem' for more information about ISPs.

Connection action

- if you are affected by the limited circumstances that might allow you to defer connection, decide if you wish to do so and if this is the case apply to DWP
- if approval is obtained inform all your relevant stakeholders.

Record keeping action

 if your connection date is changed 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.

Timing

- you must apply to defer connection by 9 August 2024
- if deferral is successful, you should let all your relevant stakeholders know as soon as possible after confirmation of deferral is obtained.

10. Registration

More information can be found in:

- DWP and MaPS staging guidance: this link will be inserted when the staging guidance is published
- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance

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.

MaPS will specify in the staging guidance when you are to register and what steps you must complete before registering.

Connection action

register with the MaPS governance register.

Timing

by the date specified by MaPS in the staging guidance.

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 'Connecting to the ecosystem' 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: data cleansing, loading AVC data where <u>approach 2</u> is used, 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

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

Record keeping action

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

Timing

we recommend by 1 April 2024.

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 data where
 approach 2 is used, record keeping, internal controls, reporting, policies,
 converting a possible match into a match made, responding to information
 requests from third parties 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 <u>dashboards available point</u> (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

- consider what your BAU budget might be and inform the party responsible for approving your budget
- at the appropriate time seek approval for your BAU budget.

Record keeping action

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

Timing

- we recommend you give the party responsible for approving your budget an idea
 of what they can expect your BAU budget to be, at the same time as when you
 seek approval for your connection budget by 1 April 2024
- we recommend six months before the DAP you seek approval for your BAU budget from the appropriate party.

12. Connecting to the ecosystem

More information can be found in:

- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDP dashboards connection hub: https://www.pensionsdashboardsprogramme.org.uk/connection/
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/
- National LGPS frameworks homepage: https://www.nationallgpsframeworks.org/.

You must connect to the dashboards ecosystem by 31 October 2026 (unless you are able to defer connection). You should also have regard to the staging guidance that will be published by the Secretary of State for Work and Pensions and MaPS. The staging guidance will contain a timeline indicating when you are scheduled to connect. See section 9 for more information about connection.

You need to decide how you are going to connect to the dashboards 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 dashboards 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 dashboards ecosystem at the same time as you – where approach 1 or 1A is used, and that their connection remains compliant.

Connecting directly

Connecting directly to the dashboards ecosystem will be a significant undertaking. Typically requiring specialist resource and experience in order 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 think it is highly unlikely you will 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, they will create their own connections with the dashboards ecosystem and plug you in alongside other clients.

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

Initially this will most likely be from your existing pensions administration software provider, though it can be any ISP.

You need to talk to your chosen ISP, as soon as possible to understand at the very least, the following:

- how much this will cost both to connect to the ecosystem and maintaining connection
- 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 dashboards, by your connection date and in accordance with your staging timeline.

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

National LGPS Frameworks and ISPs

In November 2023, the National LGPS frameworks confirmed:

"We have implemented a variation to the existing National LGPS Framework for Pensions Administration Software to allow for the inclusion of ISP services. This means users who have appointed their software provider via the Pensions Administration Software Framework or plan to use it before its expiration in April 2025 are able to make use of the variation to incorporate ISP services within their contract.

We are also currently working with a number of authorities on a new National LGPS Framework for Integrated Service Providers and Member Data Services. This Framework will include lots for ISPs, Address Tracing, Mortality Screening, Bank Account Verification and Data Quality Reporting / Dashboard Readiness. This Framework is due to launch in the first quarter of 2024.

Please contact Leon Thorpe, Head of Operational Services and Support, National LGPS Frameworks if you would like to find out more on 01603 495922 — leon.thorpe@norfolk.gov.uk"

Connection action

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

Resource action

- decide what resource you will need to implement dashboards
- consider what resource you need to operate dashboards once live.

Internal controls action

 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

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

 keep a record of how you decided what resource you will need and the parties you communicated with in doing so.

Timing

- we recommend you decide your route to connection by 1 April 2024
- we recommend you choose, start your engagement with and contractually engage your ISP by 30 September 2024
- we recommend once appointed you keep track of your ISPs development to connect you to dashboards on an ongoing basis
- we recommend you decide what resource you will need to implement dashboards by 1 April 2024
- we recommend six months before the DAP, you consider and put in place what resource you might need to operate dashboards once live.

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: https://www.pensionsdashboardsprogramme.org.uk/consumer-protection/

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.

14. Matching criteria

More information can be found in:

- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDP guidance on find data: https://www.pensionsdashboardsprogramme.org.uk/data-providers/find-data/
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/

You need to understand what personal data and contact information you will receive from the pensions finder service to help you match members to their pension records – this is called 'find data'.

From the find data, having regard to guidance issued by MaPS, it's your decision what you use to match members on your pensions administration software system. You will find it helpful to chat to your ISP in deciding. If you have agreed with your AVC provider for them to send your AVC view data directly to dashboards on your behalf – approaches 1 & 1A, 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. If required, put a plan in place to improve the accuracy and digital accessibility of this data. Regularly review your plan to make sure improvements have taken place. 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 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 action

 decide your policy on what personal data you will use to form your matching criteria for both your main scheme and AVCs.

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

Governance action

 produce or update your DPIA to take account of your matching criteria policy decision.

Data action

 assess if the personal data - main scheme and AVCs, that forms your matching criteria is accurate and digitally accessible.

Internal controls action

- if the personal data main scheme and AVCs, used to form your matching criteria is inaccurate and / or digitally inaccessible create a plan to improve the accuracy and digital accessibility
- regularly review your plan to make sure improvements have taken place
- 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.

Timing

- we recommend you decide what personal data main scheme and AVCs, you will use to form your matching criteria by 30 September 2024
- we recommend you assess the accuracy and digital accessibility of the personal data – main scheme and AVCs, that forms your matching criteria by 30 September 2024
- if the personal data main scheme and AVCs, that forms your matching criteria
 is inaccurate and / or digitally inaccessible we recommend you create a plan to
 improve the accuracy and digital accessibility of this data after the initial review
 and you regularly review the plan to make sure improvements have taken place
- the personal data main scheme and AVCs, used to form your matching criteria must be accurate and digitally accessibly by 31 October 2026 and in accordance with your staging timeline

 once the personal data – main scheme and AVCs, used to form your matching criteria is accurate and accessible, we recommend you immediately put in place a plan to maintain its accuracy and digital accessibility.

15. View data - process, accuracy & accessibility

More information can be found in:

- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDP dashboards data standards page:
 https://www.pensionsdashboardsprogramme.org.uk/data-standards/
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/

Main scheme

Following a successful find request, you must return view data by way of your ISP 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 <u>limited administrative data</u> 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 'View data in detail' for more information.

Data action

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

Timing

we recommend by 1 April 2024.

Additional voluntary contributions (AVCs)

Findings indicate there are ten additional voluntary contribution (AVC) providers who administering authorities have entered into agreements to establish AVC schemes. These are:

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

Following a request for information about AVC s and dashboards by the Local Government Association, six providers responded. Findings indicate, there is a mixture of approaches towards the provision of AVC view data to dashboards. The National LGPS Technical Group is looking at this area in more detail – see AVCs and dashboards in section 1 of this guide.

Regardless of the approach taken by your AVC provider(s) you are responsible for the accuracy and provision of AVC view data to dashboards. You should discuss with your AVC provider(s) how they intend to provide AVC view data.

Approach 1 – AVC view data sent direct to dashboards by AVC providers

Following a successful find request, the AVC provider will send the AVC view data directly to dashboards. There will be a pension code to link the member's main scheme benefits with their AVC benefits.

Approach 1A – AVC view data sent direct to dashboards by AVC providers
Potentially there is another approach where AVC view data is sent direct to
dashboards by AVC providers. This is where the pension code to link the member's
defined benefits with their AVC benefits is not used. The National LGPS Technical
Group is looking at this area in more detail.

Approach 2 – AVC view data periodically sent to you, for you to send to dashboards

The AVC provider will send you the AVC view data periodically. The AVC view data will need to be stored in a digitally accessible mode. You will need to agree the frequency of the periodic data provision with your AVC provider(s). Following a successful find request, you will send the AVC view data directly to dashboards.

Data action

 agree with your AVC provider(s) how your AVC view data will be sent to dashboards.

Internal controls actions

Action – approach 1 & 1A AVC view data sent direct to dashboards

 confirm on an ongoing basis your AVC provider(s) are on track to connect to dashboards by your connection date and in accordance with your staging timeline.

Action – approach 2 AVC view data periodically sent to you

- confirm you can store the AVC view data in a digitally accessible mode
- agree the frequency and format by when the AVC view data will be sent to you by your AVC provider(s).

Timing

- we recommend you agree with your AVC provider(s) how your AVC view data will be sent to dashboards by 30 June 2024
- if approach 1 & 1A we recommend you confirm your AVC provider (s) are on track to connect to dashboards on an ongoing basis by no later than 31 October 2026 and in accordance with your staging timeline
- if approach 2 we recommend you confirm you can store AVC view data in a digitally accessible mode and agree the frequency and format by when it will be sent to you on an ongoing basis and by 30 September 2024.

Accuracy and digital accessibility

You need to make sure all view data – both main scheme and AVCs, is accurate and digitally accessible.

Talk to your AVC provider(s) to make sure your AVC view data is accurate and digitally accessible. Regardless of the approach you take to sending AVC view data

to dashboards you will also need to member match the records held on your pensions administration system with those held on your AVC provider(s) system, to make sure they are consistent.

If required, put a plan in place to improve the member match, accuracy and digital accessibility of all this data. Regularly review your plan to make sure improvements have taken place. Ensure you have a process in place to maintain the accuracy of all your view data once dashboards are live.

Data action

- assess your main scheme view data for accuracy and digital accessibility resolve discrepancies
- assess your AVC view data for member matching, accuracy and digital accessibility – resolve discrepancies.

Internal controls action

- if any of your view data is inaccurate and / or digitally inaccessible create a plan to improve the accuracy and digital accessibility
- if the records held on your pensions administration system do not match the member records held on your AVC provider(s) system create a plan to resolve the matching discrepancies
- regularly review your plan(s) to make sure improvements have taken place
- maintain your plan(s) once dashboards are live.

Timing

- we recommend you assess your main scheme and AVC view data as soon as possible to make sure it is member matched, accurate and digitally accessible
- if necessary, we recommend you put a plan in place to improve the member matching, accuracy and digital accessibility of your main scheme and AVC view data after your initial review
- all your view data must be member matched, accurate and digitally accessible by 31 October 2026 and in accordance with your staging timeline.

16. View data in detail

More information can be found in:

- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDP dashboards data standards page: https://www.pensionsdashboardsprogramme.org.uk/data-standards/.
- Actuarial Standard Technical Memorandum (AS TM1) version 5.0: https://www.frc.org.uk/actuaries/actuarial-policy/technical-actuarial-standard-technical-memorandum-as-tm1
- Actuarial Standard Technical Memorandum (AS TM1) consultation draft version
 5.1: https://www.frc.org.uk/consultations/consultation-on-as-tm1-v51/
- PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/

This section reflects our understanding of the intention of the regulations. See <u>appendix three 'Regulatory queries'</u> for more information on the queries we have raised and the answers received from DWP and MaPS.

View data comprises of administrative data, signpost data, value data and contextual information. This is in respect of both the member's main scheme benefits and AVCs.

Administrative data

This is broken down into three subcategories.

Pension arrangement data

Information about the pension arrangement within which the individual has a pension, or a right to claim a benefit.

Administrator data

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

Where <u>approach 2</u> is used to send AVC view data to dashboards, you will need to consider to which organisation the member should get in touch with, to find out more about their pension benefits? Should the member contact you or should the member contact the relevant AVC provider?

Employer data where available

Information about the employment that gave rise to the pension.

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

Data action

- decide whether to name the most recent employer or confirm if there are multiple employers and inform your ISP – applicable to main scheme benefits and AVCs
- where <u>approach 2</u> 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.

Timing

we recommend by 30 September 2024.

Limited administrative data

This is broken down into two subcategories.

Pension arrangement data

Name of the pension arrangement within which the individual might have a pension, or a right to claim a benefit.

Administrator data

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

As mentioned under '<u>Administrative data</u>', where <u>approach 2</u> is used to send AVC view data to dashboards, you will need to consider to which organisation the member should get in touch with, to find out more about their pension benefits? Should the member contact you or should the member contact the relevant AVC provider?

Signpost data

We do not believe signpost data applies to the LGPS. This is because it includes costs, charges, an implementation statement and an annual report.

If this understanding changes we will update this guide.

Value data - main scheme benefits

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.

Value data decisions

Regulations and guidance are silent on a number of areas concerning how to calculate and present value data. 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 sets out a checklist for you to complete.

Data action

complete the check list in appendix two.

Timing

we recommend by 30 September 2024.

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.

From 1 October 2023 and after a pension illustration has been provided, value data represents:

- an annualised accrued value calculated as if the individual had reached their retirement date on the illustration date,
- if held, a projected pot value, and
- an annualised projected value.

These values are calculated using version 5.0 of the Actuarial Standard Technical Memorandum (AS TM1) version 5.0 produced by the Financial Reporting Council (FRC), in the calculation of statutory money purchase illustrations (SMPIs). On 3 November 2023 the FRC published a consultation to revise AS TM1 to update the accumulation rate assumptions used within the guidance – version 5.1. The consultation closes on 4 December 2023.

The AVC illustration dates, both for accrued value data and estimated retirement income must be the same as what you use for the main scheme benefits. This might cause problems where the main scheme ABS is out of sync with the AVC SMPI. See section 17 – timings to provide view data for more information. The National LGPS Technical Group's sub-group is looking at his area in more detail.

The AVC payable date can be different to the main scheme benefits. PDP have advised it is for each scheme to decide these dates based on the scheme's structure and design.

Exemptions to providing projected AVC value data

You can decide not to provide AVC projections in certain circumstances. You should agree with your AVC provider how you will proceed.

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 retirement date.

You will need to keep a record of how you decided whether to provide AVC projections and the parties you communicated with in doing so.

Data action

- agree the AVC illustration date with your AVC provider(s) and where approach 2
 is used inform your ISP
- agree with your AVC provider(s) if you will provide AVC projections where you
 are not required to do so by law and where approach 2 is used inform your ISP
- agree with your AVC provider(s) your AVC payable dates and where approach 2 is used inform your ISP.

Record keeping action

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

Timing

we recommend by 30 September 2024.

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 PDPs data standards.

17. Timings to provide all view data

More information can be found in:

- TPR dashboards initial guidance: https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance
- PDPs dashboards view data page: https://www.pensionsdashboardsprogramme.org.uk/data-providers/view-data/.

This section sets out the timings by when you must provide all view data following a member's request via a dashboard.

It reflects our understanding of the intention of the regulations. If your AVC provider(s) adopts <u>approach 2</u> and sends AVC view data directly to you to send to dashboards, the timescales in this section apply equally to AVC value data. See <u>appendix three 'Regulatory queries'</u> for more information on the queries we have raised and the answers received from DWP and MaPS.

Overview

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

The Occupational Pension Schemes (Disclosure of Information) Regulations 2013 require your AVC provider(s) to issue a statutory money purchase illustration (SMPI) statement 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.

<u>Section 16</u> sets out the data that makes up view data, value data is one of the elements. Value data is essentially the values quoted in the ABS / AVC SMPI statement, including estimated retirement income (ERI). As long as members receive an ABS / AVC SMPI statement containing value data this is the data that should be supplied to dashboards. You can decide not to provide ERI for AVCs in limited circumstances – see <u>section 16</u> 'View data in detail' for more information.

If for some reason the member is not sent an ABS / AVC SMPI statement, you will need to create a process to calculate the missing value data and provide it to dashboards within the statutory timescales set out later in this section. This includes missing AVC SMPI value data, where approach2 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 <u>approach 1 & 1A</u> is adopted - your AVC provider(s) send AVC value data directly to dashboards, you will need to make sure they also create a process to calculate any missing AVC value data and provide it to dashboards 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 dashboards 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 to make sure you can send main scheme value data within the timescales set out later in this section
- consider introducing monthly data contributions (MDC) to achieve the timescales set out in this section
- if approach 1 & 1A is adopted check with your AVC provider(s) to make sure they are able to send AVC value data using the same illustration date as the main scheme benefits within the timescales set out later in this section
- if approach 2 is adopted check with your AVC provider(s) to make sure they are able to send AVC value data using the same illustration date as the main scheme benefits to you well within the timescales set out later in this section so that you can send AVC value data to dashboards within the statutory timescales
- where any value data is out of date or you do not have value data stored:
 - decide how and on what illustration date, you are going to calculate main scheme value data and provide it to dashboards within the timescales set out later in this section
 - approach 1 & 1A agree with your AVC provider(s) how and on what illustration date (this date must be consistent with the date you have used to calculate the main scheme value data) they are going to calculate AVC value data and provide it to dashboards within the timescales set out later in this section
 - approach 2 agree with your AVC provider(s) how and on what date (this date
 must be consistent with the date you have used to calculate the main scheme
 value data) they are going to calculate AVC value data and provide it to you to
 send to dashboards within the timescales set out later in this section.

Record keeping action

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.

Timing

we recommend by 30 September 2024.

Match made

New joiners

For new joiners there are different timescales by when you must supply:

- administrative data, and
- value data and contextual information.

Administrative data

You must return <u>administrative data</u> within three months of date the member joined the LGPS.

If the member joined the LGPS after this time, they are no longer a new joiner and you must immediately return administrative data.

Value data and contextual information

You must return <u>value data and contextual information</u> as soon as practicable and by the earlier of:

- the date the first ABS is produced for the member, or
- 12 months after the end of the member's first full scheme year this should never apply to main scheme value data. This is because an ABS must always be issued to the member under the LGPS regulations before this timescale is reached. It could apply to AVC value data where your AVC provider has decided not to issue an AVC statement, as is their right under the Occupational Pension Schemes (Disclosure of Information) Regulations 2013.

Once an ABS / AVC SMPI statement has been provided to the member, they are no longer a new joiner. The timescales that apply to 'members who are not new joiners' applies thereafter for the provision of value data and contextual information.

Members who are not new joiners

This section does not apply to members who are <u>new joiners</u>.

You must immediately return administrative data.

You must return value data and contextual information:

- a. immediately where the value data is generated from:
- an ABS / AVC SMPI 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.
- b. where (a) does not apply for main scheme benefits and AVC value data, within 10 working days from the date on which a match is made.

Maybe match

Following a 'maybe match' you must immediately return <u>a limited form of administrative data</u>.

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

18. Operational information and reporting

More information can be found in:

PDP reporting standards:
 https://www.pensionsdashboardsprogramme.org.uk/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. Not limited to, operational information can cover:

- number of find requests you receive
- your matching process
- number of matches made you notify to MaPS
- how quickly you resolve and possible matches
- number of possible 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.

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.

Governance action

- understand the operational information requirements and your responsibilities
- · discuss the operational information requirements with your third party 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 how you took steps to prepare 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.

Timing

 we recommend start considering the operational information requirements from the outset of implementation.

19. Compliance and enforcement

More information can be found in:

- TPR's draft compliance and enforcement policy:
 https://www.thepensionsregulator.gov.uk/en/document-library/consultations/dashboards-compliance-and-enforcement-policy-consultation-document.
 policy/dashboards-compliance-and-enforcement-policy-consultation-document.
- PDPs dashboards consumer protection page:
 https://www.pensionsdashboardsprogramme.org.uk/consumer-protection/

The Pension Dashboard Regulations 2022 – 'the Regulations', sets out your responsibilities to make sure pensions dashboards function. This guide outlines those responsibilities and the links to the on-line information sets out the detail.

The Regulations include compliance and enforcement powers. These provide TPR with the power to pursue you, 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 draft compliance and enforcement policy

TPR sets out its expectations, as well as providing clarity on its approach to enforcement, in its <u>draft compliance and enforcement policy</u>. The consultation closed on 24 February 2023. As of 8 June 2023, TPR are currently considering what changes if any are needed to the draft policy.

Of particular interest, within the draft policy are a 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 or 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.

20. Appendix one – preparing to connect checklist

We have provided a checklist of the actions, record keeping requirements and timings set out in this guide. The list is not exhaustive and may be impacted by your local approach.

Your connection date is by 31 October 2026 and in accordance with the staging guidance produced by MaPS. If you intend to connect after this date, the timescales in the checklist will need to be adjusted.

Where the 'due date' is before 31 October 2026, this merely a recommendation. Our recommendation may change depending upon the content of the staging guidance issued by MaPS.

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

- 1. Governance
- 2. Internal controls
- 3. Connection
- 4. Record keeping
- 5. Budget
- 6. Resource
- 7. 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 'Keeping you and your stakeholders up to date' |
| Governance | Keep up to date with the latest information and developments | ASAP and ongoing | Section 4 'Keeping you and your stakeholders up to date' |
| 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 'Keeping you and your stakeholders up to date' |
| Governance | Make sure pensions dashboards are a standing agenda item at your Pensions Committee and Local Pension Board meetings | ASAP and ongoing | Section 5 'Pensions Committee / Local Pension Board' |
| 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 'Pensions Committee / Local Pension Board' |
| Governance action | Agree with your AVC provider(s) how your AVC value data will be cleansed and matched to your records | ASAP and ongoing | Section 6 'Accuracy and accessibility of data' |

| Topic | Connection tasks | Due date | More information |
|----------------------|---|---|---|
| Internal controls | Incorporate dashboards data requirements into your wider data management plan including your approach to cleansing and matching your AVC data | ASAP | Section 6 'Accuracy and accessibility of data' Section 7 'Internal controls' |
| Internal controls | Regularly review your wider data management plan to determine where you are at | Ongoing once incorporated into your plan | Section 6 'Accuracy and accessibility of data' Section 7 'Internal controls' |
| Internal controls | Set up your internal controls register to implement dashboards | 1 April 2024 | Section 7 'Internal controls' |
| Connection | Make sure you and your relevant stakeholders know your connection deadline and once published, your staging timeline | Within two months of when the staging guidance is published | Section 9 'Connecting to dashboards' |
| Connection | If you meet the requirements, decide if you wish to defer connection and apply to DWP if this is the case | 9 August 2024 | Section 9 "Connecting to dashboards" |
| Connection | If approval to defer connection is obtained let all your relevant stakeholders know your new connection date | ASAP after confirmation of deferral is obtained | Section 9 "Connecting to dashboards" |

| Topic | Connection tasks | Due date | More information |
|-------------------|---|--|--|
| 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 | Section 7 'Internal controls and record keeping' Section 9 'Connecting to dashboards' |
| Connection | Register with the MaPS governance register | By the date specified by MaPS in the staging guidance | Section 10 'Registration' |
| Budget | Decide on your connection budget and obtain approval | 1 April 2024 | Section 7 'Internal controls and record keeping' Section 11 'Budget' |
| Record keeping | Keep a record of how you decided on your connection budget and the parties you communicated with, in making your decision | 1 April 2024 | Section 7 'Internal controls and record keeping' Section 11 'Budget' |
| Budget | Decide on your potential business as usual budget and provide the party responsible for approving advance notice of this cost | 1 April 2024 | Section 7 'Internal controls and record keeping' Section 11 'Budget' |

| Topic | Connection tasks | Due date | More information |
|-------------------|---|---------------------------|--|
| Budget | Decide on your business as usual budget and obtain approval | Six months before the DAP | Section 11 'Budget' |
| Record | Keep a record of how you decided on your | Six months before | Section 7 'Internal controls and |
| keeping | business as usual budget and the parties you communicated with, in making your decision | the DAP | record keeping' Section 11 'Budget' |
| Connection | Decide your route to connection – either directly or using an ISP | 1 April 2024 | Section 12 'Connecting to the ecosystem' |
| Record keeping | Keep a record of how you decided on your route to connection and the parties you communicated with, in making your decision | 1 April 2024 | Section 7 'Internal controls and record keeping' Section 12 'Connecting to the ecosystem' |
| Connection | Choose your ISP and contractual engage them | 30 September 2024 | Section 10 'Connecting to the ecosystem' |
| Record | Keep a record of how you choose your ISP and the | 30 September | Section 7 'Internal controls and |
| keeping | parties you communicated with, in making your decision | 2024 | record keeping' Section 12 'Connecting to the ecosystem' |

| 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 | From appointment and by | Section 12 'Connecting to the ecosystem' |
| | accordance with your staging timeline | 31 October 2026 and in accordance with your staging timeline | |
| Resource | Decide what resource you will need to implement dashboards and put in place accordingly | 1 April 2024 | Section 12 'Connecting to the ecosystem' |
| Record keeping | Keep a record of how you decided what resource you need to implement dashboards and the parties you communicated with, in making your decision | 1 April 2024 | Section 7 'Internal controls and record keeping' Section 12 'Connecting to the ecosystem' |
| Resource | Decide what resource you will need to operate dashboards once live and put in place accordingly | Six months before the DAP | Section 12 'Connecting to the ecosystem' |
| Record keeping | Keep a record of how you decided what resource you need to operate dashboards once live and the parties you communicated with, in making your decision | Six months before the DAP | Section 7 'Internal controls and record keeping' Section 12 'Connecting to the ecosystem' |

| Topic | Connection tasks | Due date | More information |
|------------|--|--------------------|----------------------------------|
| Policy | Decide on what personal data you will use to form | 30 September | Section 14 'Matching criteria' |
| | your matching criteria for both your main scheme and AVC | 2024 | |
| Record | Keep a record of your matching criteria, for at least | From the date of | Section 7 'Internal controls and |
| keeping | six years from the end of the scheme year in which | your decision and | record keeping' |
| | you made that decision | ongoing thereafter | Section 14 'Matching criteria' |
| Record | Keep a record of how you decided on your | From the date of | Section 7 'Internal controls and |
| keeping | matching criteria and the parties you | your decision and | record keeping' |
| | communicated with | ongoing thereafter | Section 14 'Matching criteria' |
| Governance | Produce or update your Data Protection Impact | From the date of | Section 14 'Matching criteria' |
| | Assessment to take account of your matching | your decision and | |
| | criteria policy decision | ongoing thereafter | |
| Data | Assess if the personal data that forms your | 30 September | Section 14 'Matching criteria' |
| | matching criteria – main scheme personal data and | 2024 | |
| | AVC personal data, is accurate and digitally | | |
| | accessible | | |

| 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 | After initial assessment | Section 7 'Internal controls and record keeping' Section 14 'Matching criteria' |
| 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 | Section 7 'Internal controls and record keeping' Section 14 'Matching criteria' |
| Data | Make sure the personal data used to form your matching criteria – both main scheme and AVCs, is accurate and digitally accessible | By 31 October 2026 and in accordance with your staging timeline | Section 14 'Matching criteria' |
| 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 | By 31 October 2026 and in accordance with your staging timeline, and permanently thereafter | Section 7 'Internal controls and record keeping' Section 14 'Matching criteria' |

| Topic | Connection tasks | Due date | More information |
|-------|--|--------------|---|
| Data | Understand what main scheme view data you need to return for members who access dashboards and | 1 April 2024 | Section 15 – 'View data – process, accuracy & accessibility' |
| | in what timescale | | Section 16 – ' <u>View data – defined</u> benefits and AVCs' |
| | | | Section 17 – ' <u>Timings to provide view</u> data' |
| Data | Agree with your AVC provider(s) how your AVC view data will be sent to dashboards | 30 June 2024 | Section 15 – 'View data – process, accuracy & accessibility' |
| | | | Section 16 – 'View data in detail' |

| Topic | Connection tasks | Due date | More information |
|----------|--|---|--|
| Internal | Approach 1 & 1A – AVC view data sent directly to | Ongoing basis and | Section 7 'Internal controls and |
| controls | dashboards by AVC providers | by 31 October | record keeping' |
| | Confirm your AVC provider(s) are on track to connect to dashboards by your connection date and in accordance with your staging timeline | 2026 and in accordance with your staging timeline | Section 12 'Connecting to the ecosystem' Section 15 – 'View data – process, accuracy & accessibility Section 16 – 'View data in detail' Section 17 – 'Timings to provide view data' |
| Internal | Approach 2 – AVC view data sent to you to send to | Ongoing basis and | Section 15 – 'View data – process, |
| controls | dashboards | by 30 September | accuracy & accessibility' |
| | Confirm you can store your AVC view data in a digitally accessible mode Agree the frequency and format by when your AVC view data will be sent to you by your AVC provider(s) | 2024 | Section 16 – ' <u>View data in detail</u> ' Section 17 – ' <u>Timings to provide view</u> <u>data'</u> |

| Topic | Connection tasks | Due date | More information |
|----------------------|---|----------------------|--|
| Data | Assess your main scheme view data for accuracy and digital accessibility | ASAP | Section 15 – ' <u>View data – process</u> , accuracy & accessibility' Section 16 – ' <u>View data – defined</u> |
| Data | Assess your AVC view data for member matching, accuracy and digital accessibility | ASAP | benefits and AVCs' Section 15 – 'View data – process, accuracy & accessibility' |
| | | | Section 16 – ' <u>View data – defined</u> benefits and AVCs |
| Internal controls | If required, put plans in place to improve the member matching, accuracy and digital accessibility of main scheme and AVC view data | After initial review | Section 7 'Internal controls and record keeping' Section 15 – 'View data – process, accuracy & accessibility' |
| | | | Section 16 – 'View data in detail' |

| Topic | Connection tasks | Due date | More information |
|----------------------|--|--|--|
| Internal controls | If you put plan in place to improve the member matching, accuracy and digital accessibility of your main scheme and AVC view data, confirm the plan has delivered its improvements All your view data must be member matched, accurate and digitally accessible by 31 October 2026 and in accordance with your staging timeline | Ongoing after the plan is put in place | Section 7 'Internal controls and record keeping' Section 15 – 'View data – process, accuracy & accessibility' Section 16 – 'View data in detail' |
| Internal controls | Ensure you have a process in place to maintain the member matching, accuracy and digital accessibility of your main scheme and AVC view data | Ongoing and after staging | Section 7 'Internal controls and record keeping' Section 15 – 'View data – process, accuracy & accessibility' Section 16 – 'View data in detail' |
| Data | Decide whether to name the most recent employer or confirm if there are multiple employers and inform your ISP – applicable to main scheme benefits and AVCs | 30 September 2024 | Section 16 'View data in detail' |

| Topic | Connection tasks | Due date | More information |
|-------------------|---|----------------------|--|
| Data | Where approach 2 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 | 30 September 2023 | Section 16 'View data in detail |
| Data | Complete the check list of decisions concerning value data in appendix two | 30 September 2024 | Section 16 'View data in detail' |
| Data | Agree the AVC illustration date with your AVC providers and where approach 2 is used inform your ISP | 30 September 2024 | Section 16 'View data in detail' |
| 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 | 30 September 2024 | Section 16 – 'View data in detail' |
| Data | Agree with your AVC provider(s) your AVC payable dates and where approach 2 is used inform your ISP | 30 September 2024 | Section 16 – 'View data in detail' |
| Record keeping | Keep a record of how you agreed your AVC illustration date and the parties you communicated with in doing so | 30 September 2024 | Section 7 'Internal controls and record keeping' Section 16 – 'View data in detail' |

| Topic | Connection tasks | Due date | More information |
|-------------------|--|----------------------|--|
| 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 | 30 September 2024 | Section 7 'Internal controls and record keeping' Section 16 – 'View data in detail' |
| Record keeping | Keep a record of how you agreed your AVC payable dates and the parties you communicated with in doing so | 30 September 2024 | Section 7 'Internal controls and record keeping' Section 16 – 'View data in detail' |
| 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 dashboards within the statutory timescales | 30 September 2024 | Section 17 – ' <u>Timings to provide all</u> view data' |
| 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 dashboards within the statutory timescales | 30 September 2024 | Section 17 – ' <u>Timings to provide all</u> view data' |
| Data | Consider introducing monthly data contributions (MDC) to achieve the timescales set out in this section | Ongoing | Section 17 – ' <u>Timings to provide view</u> data' |

| Topic | Connection tasks | Due date | More information |
|-------|--|----------------------|---|
| Data | If approach 1 & 1A is adopted and AVC value data is already stored- check with your AVC provider(s) to make sure they are able to provide AVC value data using the same illustration date as the main scheme benefits within the statutory timescales | 30 September 2024 | Section 17 – ' <u>Timings to provide view</u> data' |
| Data | If approach 2 is adopted and AVC value data is already stored- check with your AVC provider(s) to make sure they are able to send AVC value data using the same illustrations date as the main scheme benefits, to you well within the timescales set out later in this section so that you can send AVC value data to dashboards within the statutory timescales | 30 September 2024 | Section 17 – ' <u>Timings to provide view</u> data' |
| Data | If approach 1 & 1A is adopted and AVC value data is not already stored or it is out of date - agree with your AVC provider(s) how and on what illustration date (this date must be consistent with the date you have used to calculate the main scheme value data) they are going to calculate AVC value data and provide it to dashboards within the timescales set out later in this section | 30 September 2024 | Section 17 – 'Timings to provide view data' |

| Topic | Connection tasks | Due date | More information |
|-------------------|---|--|---|
| Data | If approach 2 is adopted and AVC value data is not already stored or it is out of date -agree with your AVC provider(s) how and on what illustration date (this date must be consistent with the date you have used to calculate the main scheme value data) they are going to calculate AVC value data and provide it to you to send to dashboards within the timescales set out later in this section | 30 September 2024 | Section 17 – ' <u>Timings to provide view</u> data' |
| 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 | Ongoing from the date of your decision | Section 7 'Internal controls and record keeping' Section 17 – 'Timings to provide view data' |
| 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 'Operational information and reporting' |

| Topic | Connection tasks | Due date | More information |
|----------------------|---|-----------------------------------|--|
| 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 'Operational information and reporting' |
| 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 'Operational information and reporting |
| 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 and record keeping' |
| 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 'Internal controls and record keeping' |
| 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 |

| Topic | Connection tasks | Due date | More information |
|---------|--|--------------------|----------------------------------|
| | | | |
| Record | You must keep a record of compliance as set out in | From the outset of | Section 7 'Internal controls and |
| keeping | MaPS reporting standards | implementation | record keeping' |
| | | | |
| | | | Section 19 'Compliance and |
| | | | enforcement' |
| | | | |



21. Appendix two – value data checklist

PASA dashboards guidance page: https://www.pasa-uk.com/guidance-2/

You will need to review the summary of challenges set out in table two when providing value data to dashboards. 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 | We recommend you draw value data from a stored calculation |
| Where value data cannot be drawn from an annual benefit | derived from a monthly bulk annual benefit statement routine |
| 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? | |
| Revaluation of deferred benefits | We recommend you include pensions increase calculated up to |
| How to revalue benefits for deferred members? | the illustration date |
| Rounding | We recommend you follow your existing approach in how you |
| Whether value data should be provided exact or be rounded? | 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? | • 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 |

| The challenge | LGA recommendation |
|--|--|
| Benefit underpins and guarantees | GMP |
| How to calculate value data for members with a GMP? | We recommend you do not include the GMP when calculating value data unless the member has passed the age at which GMPs are payable – age 60 for a woman and age 65 for a man. If this is the case, where appropriate, you should uplift the value data to reflect the amount of the GMP McCloud remedy This guide will be updated once the impact of the McCloud remedy on dashboards is understood |
| Split administration and AVCs | Since the PASA Values guidance was published, more |
| Whether AVC view data should be provided to dashboards by you or your AVC provider(s)? | 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. The National LGPS Technical group will also be taking this forward at a national level. See AVCs and dashboards in section one of this guide for more information |

| The challenge | LGA recommendation |
|--|---|
| Pension debits | We recommend you follow your existing approach in how you show pension debits on your annual benefit statements |
| How to display value data where members benefits are subject to a pension debit? | Show pension debits on your annual benefit statements |
| Scheme pays | We recommend you follow your existing approach in how you |
| How to display value data where members benefits are subject to a scheme pays debit? | show scheme pays debits on your annual benefit statements |
| Multiple benefits held separately in the same scheme | We recommend view data for each benefit should be supplied |
| How to display view data where the member holds more than one benefit in the LGPS? | to dashboards separately |
| Transfers in and additional benefits | We recommend you include all additional benefits within the |
| How to display additional benefits attributed to a transfer in, purchased by a member or awarded by an employer within value data? | value data without separating them out |

| The challenge | LGA recommendation |
|--|--|
| 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 | DWP have confirmed – see DWP response in appendix three, |
| Whether to display the unpaid view data, for members who have partially taken payment of their benefits? | 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 |
| 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 | |

| 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. | |

22. Appendix three - regulatory queries

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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 Summary of key policies: Draft Pensions Dashboards Regulations 2022 – GOV.UK (www.gov.uk)

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 Pel 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 'new joiners'

Regulation 26(6) of the Pensions Dashboards Regulations 2022

If a member joins the scheme on 1 May 2022, the end of that member's first full scheme year is 31 March 2024. If that member seeks view data before 1 April 2023, that member does not fall into the definition of a new joiner. This is because the member has not sought view data within the period from 1 April 2023 to 31 March 2024 (ie within 12 months of the end of that member's first full scheme year). So that member would not be treated as a new joiner and would fall under the immediate or 10 day timescales. This is not the intention as confirmed by TPR and DWP. This guide reflects the intention and not the regulations.

TPR response:

"DWP acknowledged the challenges around providing value data for new joiners, which had been articulated in the consultation response, and made provision within the Pensions Dashboards Regulations that value data should be provided as soon as practicable for new joiners. Our guidance also states that this should

be no later than when you first produce a statement for them, or 12 months from the end of the first full scheme year they have been in the scheme, whichever is soonest. Once a statement has been provided to the member in the past 12 months, then the normal valuation timing applies; and this member should no longer be treated as a new member."

DWP response:

"I think there is some mis-interpretation of what our policy intent is with regards to a member seeking view data within 12 months of the end of their first full scheme year. If we're interpreting your concerns correctly, we wonder if the confusion is arising because of the word 'within' rather than the word 'full'. I think you're suggesting that 'within' might mean 12 months *before* the end of the first full scheme year as well as 12 months after it, and we could probably have been more clear in the drafting that we really just mean 12 months after. So to clarify, our policy intent is that regulation 26(6) provides a backstop, so that, if they've not received a statement, new members should receive value data no later than 12 months after the end of their first full scheme year. It's also worth noting that it's 'as soon as practicable' so while this is a very generous allowance (which reflects industry engagement), there is the opportunity for schemes to provide it before that time where practicable."

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."

23. 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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