



In Touch technical update

Consultation on pension dashboards

The Pension Schemes Act 2021 provides a framework to support pensions dashboards, and in particular gives new powers compelling schemes to provide information. The Department for Work and Pensions (DWP) has now released its promised consultation on the regulations to put these provisions into place.

At a glance...

- Schemes with more than 1,000 members (excluding pensioners) will start to connect with dashboards from April 2023, with deadlines in bands to September 2024.
- Schemes with over 100 members will connect in bands with deadlines from October 2024 to October 2025.
- Schemes must be prepared to match data with member requests and provide specified pensions information, some of which goes beyond existing disclosure requirements.

Background—how dashboards will work

Pensions dashboards will be online platforms providing one place for individuals to access pensions information from multiple sources, including on their State Pension. The government hopes that this will give individuals a better understanding of their pensions and support their retirement planning. As required under the Act, the Money and Pensions Service (MaPS) will develop and host its own pensions dashboard.

The aim is that an individual will submit a request to find their pensions information (confirming their identity and giving the relevant consent). A 'pension finder service' then sends this 'find request' to all pension schemes: if a pension scheme finds a match with this individual it will confirm this with the dashboard service and, if the individual then requests to view their information, the dashboard will pull the individual's data directly from the pension scheme.

Requirements for trustees

The draft regulations propose that pension schemes must connect to the digital architecture (which includes being able to respond to find and view requests) within prescribed timescales as set out below.

Why bring you this note?

The DWP is consulting on its plans for dashboards and welcomes views from the industry, including trustees and administrators.

Next steps

The consultation closes on 13 March 2022.

The DWP is planning a number of consultation webinars. The Pensions Dashboards Programme (PDP) has issued initial information about the standards it will set and will consult in summer 2022 about the actual standards.

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Schemes must identify whether information held in the 'find request' matches with an individual's pension and, if it does, return a pension identifier. Trustees should have discretion over which data elements they use to search their records for a match, but will need to minimise the risks of either not returning pensions matches or returning incorrect matches. Trustees will need to have regard to any guidance issued by the Pensions Regulator on matching.

Schemes must then return 'view data' to individuals. Much of the proposed view data is already provided by schemes under the Disclosure Regulations. However, certain 'administrative data' must also be provided such as information about the scheme and the administrator, and where relevant, the individual's employment.

Certain 'signpost data' must also be provided where relevant, via website addresses—including information on costs and charges, the scheme's statement of investment principles and how it has implemented those principles.

Schemes will also have to provide 'value data' quantifying the member's benefits. The DWP proposes, for example, that money purchase arrangements will have to provide both accrued and projected values, including annual income amounts. The guidance underlying the present money purchase illustrations is to be amended to reflect and build on these new requirements—this will not be expected until October 2023, so the annualised values will not need to be provided until then. Defined benefit arrangements must show the accrued benefit at the illustration date (or revalued to that date for a deferred member). Active members will also need to see a projected benefit at retirement but based on current salary.

There will be some exemptions from providing this information—pensioners are out of scope and as at present deferred members with small money purchase pots will not have to receive projected information.

The draft legislation proposes timescales for schemes to provide this information to the dashboard. Administrative data and signpost data should be provided immediately. Value data should also be provided immediately if it relates to information already prepared in a recent benefit statement and otherwise within 3 days (or 10 days if the information includes defined benefit information).

Requirements for pensions dashboards services

Organisations other than MaPS will be able to develop and host dashboards if they meet requirements set out in the draft regulations. They will be known as Qualifying Pensions Dashboard Services if they meet all the requirements, including authorisation from the Financial Conduct Authority, compliance with relevant standards and connection to the specified digital architecture.

Dashboards must also show an individual's State Pension: as a 'current amount' and 'forecast amount'.

Intermediaries

The DWP acknowledges that trustees may rely on intermediaries such as administrators. However, the trustees remain responsible for complying with the legislation, and for ensuring that their administrators can work properly to achieve this compliance.

Timescales

The timescales for providing information to the dashboard are considerably shorter than current disclosure rules.

Reporting and enforcement action

The DWP proposes that schemes will need to report information such as the number of find requests received, how many positive matches were notified to MaPS, and how many possible matches arose (and how soon these were resolved into full matches, or whether they resulted in a non-match or remained unresolved). They would also report on the number of view requests received, and the time taken to respond to each one.

For breaches of the requirements, the Regulator would have the option to issue a compliance notice to the trustees (or to third parties who have caused a compliance breach).

Standards

The DWP proposes that there will be a range of standards covering the legislative requirements, including: data; design and messaging; technical matters; and reporting. It is expected that MaPS will set these standards, although the Regulator may set the reporting standards.

Timescales for joining dashboards

All schemes in scope will have to register with MaPS and must then connect to the dashboard within a staging sequence according to their scheme type and number of 'relevant members' (i.e. excluding pensioners) as at the scheme year end falling between 1 April 2020 and 31 March 2021.

The staging profile for schemes of different types and sizes is shown in the timeline on the right and the table below.

Timeline (end of month shown) for large private sector occupational schemes:

Relevant members	Master trusts	Money purchase Used for AE	Other money purchase	Defined benefit
20,000+	Jun 2023	Jul 2023	Nov 2023	Nov 2023
10,000-19,999	Sep 2023	Sep 2023	Mar 2024	Mar 2024
5,000-9,999	Oct 2023	Oct 2023	Jun 2024	Jun 2024
2,500-4,999	Jan 2024	Jan 2024	Jul 2024	Jul 2024
1,500-2,499	Feb 2024	Feb 2024	Aug 2024	Aug 2024
1,000-1,499	Feb 2024	Feb 2024	Sep 2024	Sep 2024

Hybrid schemes providing both money purchase and defined benefits will stage (the whole scheme) on the earlier of the two dates that would apply if these were separate schemes.

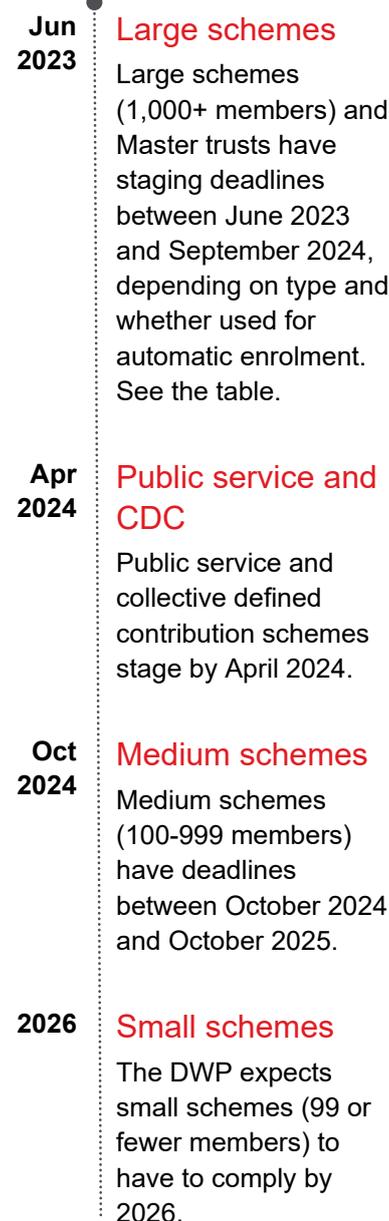
The draft legislation makes provision for new schemes and those that change their size into another staging band.

There will be a limited provision for schemes to request an extension to their staging date, if they had in good faith embarked on a programme to transition data to a new administrator before staging dates were known.

Schemes can volunteer to connect to the dashboard early.

Penalties for non-compliance

These could be up to £5,000 for individuals (£50,000 otherwise). The Regulator might impose them on a 'per request' basis.



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