Pensions Dashboards – Keys to Compliance

Where We Are

The deadlines by which pension schemes must connect with pensions dashboards are set out in schedule 2 of the draft Pensions Dashboards Regulations 2022 (Regulations). The government confirmed in its response to consultation that the regulations will be amended for some cohorts of schemes – our timeline overleaf reflects the government's stated intentions.

Staging dates broadly depend on a combination of:

- The number of active and deferred members in the scheme

- The Department for Work and Pensions' (DWP) understanding of the "data-readiness" of the scheme type or sector

Compulsory connection with pensions dashboards will be required by the end of August 2023 for the first occupational pension schemes caught by the new legislation (master trusts), personal pension providers and the state pension scheme.

What to Do Now

There is no doubt that the dashboards programme is ambitious and preparation is key.

Here are some compliance buttons for pension scheme trustees to press in the coming months. It is time to use the "Control" key – the "Escape" key is not an option.

Check your staging date

Consider allocating responsibility for dashboards preparation to a sub-group and ensure that terms of reference are in place.

Speak to third-party administrators or software providers about connection solutions and any potential impact on the scheme's staging date.

Continue to work towards resolving data gaps and improving the scheme's data score. Would a data cleansing exercise be beneficial?

Are member benefit calculations fully automated? If not, is it possible to achieve automation before the scheme's staging date?

Consider data matching criteria. Trustees are responsible for setting this criteria to match individuals with member records held by the scheme.
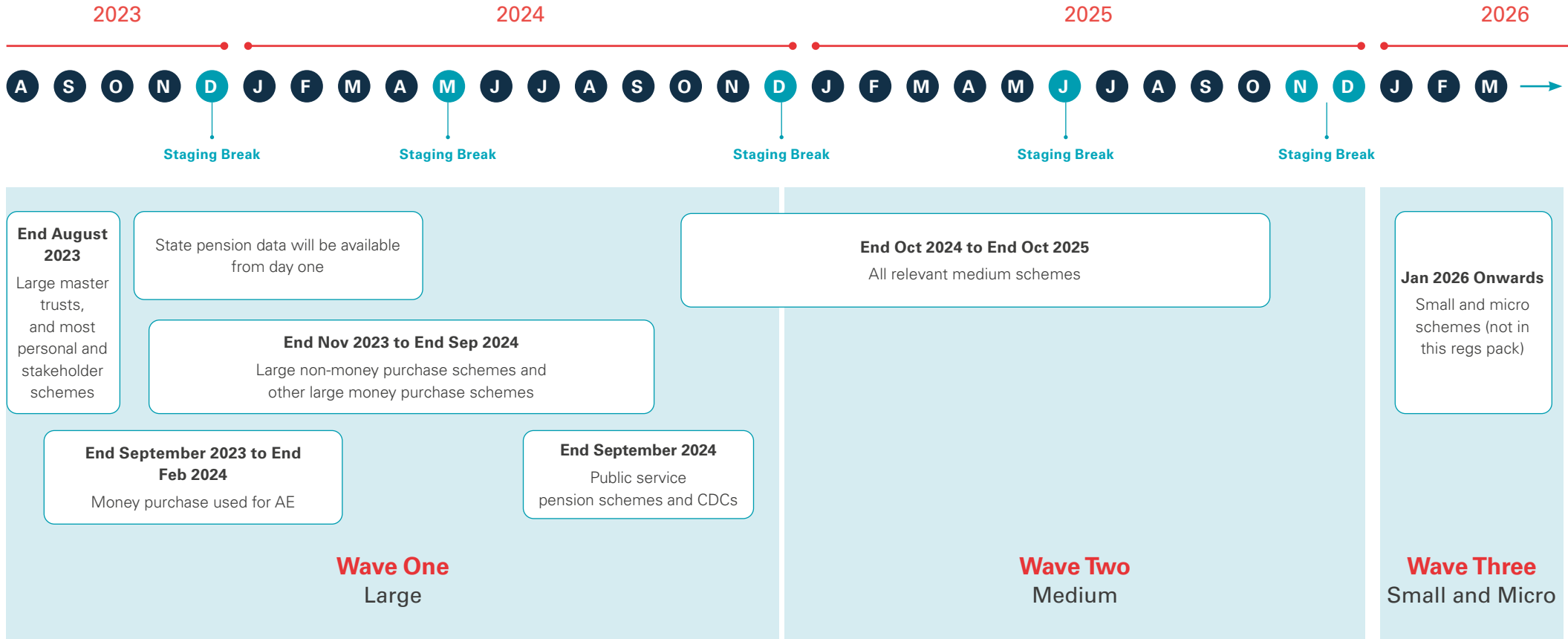
Ensure that the scheme's data protection framework is up to date. Dashboards will create new relationships and new data controller responsibilities.

Take legal advice on administration contracts – these will need to cover dashboards responsibilities. Also, take legal advice if a change of administrator is planned.

Consider trustee training. Dashboards are a major industry development and trustees need to take informed decisions. There is also a lot of new terminology.

We can expect a lot of activity from government, regulatory bodies, the Pensions Dashboards Programme (PDP) and MaPS in the coming months. Keep an eye on developments.

Staging Timeline

2023   2024   2025   2026

A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F M →

Staging Break   **Staging Break**   **Staging Break**   **Staging Break**   **Staging Break**

End August 2023
Large master trusts, and most personal and stakeholder schemes

State pension data will be available from day one

End Nov 2023 to End Sep 2024
Large non-money purchase schemes and other large money purchase schemes

End September 2023 to End Feb 2024
Money purchase used for AE

End September 2024
Public service pension schemes and CDCs

End Oct 2024 to End Oct 2025
All relevant medium schemes

Jan 2026 Onwards
Small and micro schemes (not in this regs pack)

Wave One
Large

Wave Two
Medium

Wave Three
Small and Micro

The timeline is based on a slide used by the DWP in a series of webinars on pensions dashboards. Recordings of these webinars are on the PDP website.