

PENSIONS DASHBOARDS PROGRAMME

Introduction

1. This report provides an update on the Fund's progress in preparing for the implementation of the national Pensions Dashboards Programme.

Recommendation

2. The Committee is asked to note the position on the Fund's preparation for the Pensions Dashboard Programme.

Pensions Dashboards - Timelines

3. The Committee are reminded that on 19 July the Department for Work and Pensions (DWP) laid the Pensions Dashboards (Amendment) Regulations 2023, which came into force on 9 August 2023. The amendment regulations introduced a single 'connection deadline' of 31 October 2026 for relevant schemes to connect to pensions dashboards.
4. In addition to this single connection deadline, which applies to all pension schemes in the UK, there are separate staging dates for specific schemes ahead of the 31 October 2026 deadline to encourage a staged approach as set out in guidance.
5. During its online connection forum on 14 November 2023, the Pensions Dashboard Programme (PDP) confirmed the proposed staging date for public service pension schemes as 30 September 2025.
6. PDP are currently consulting with industry regarding the final staging guidance that will be published by the Money and Pension Service (MaPS) in the spring of 2024.
7. The staging guidance will confirm the proposed staging date of 30 September 2025. Regulation 15(2) of the Pensions Dashboards Regulations 2022 confirms that administering authorities have a legal duty to have regard to this guidance.
8. The Fund is working towards the 30 September 2025 deadline in its preparations for dashboard readiness.

Integrated Service Provider

9. At the last meeting in December 2023, the Committee were advised that the Fund was seeking to appoint an Integrated Service Provider (ISP) at the earliest opportunity.
10. The ISP sits between the Fund and the pensions dashboards and will create their own connections to the dashboards. They will take a regular cut of the Fund's data, typically monthly, and make that available to the dashboards so that members can be matched, and the relevant data can be viewed.

11. An Electronic Decision Notice (EDN) was issued to the Committee on 2 January 2024 requesting endorsement to appoint the Fund's administration database provider as the ISP. The EDN was approved, and the ISP has now been appointed.
12. Before becoming an approved ISP, all such providers are required to go through the 'Beta' testing phase and be officially signed off by the PDP. Dates for the beta phase have not been formally announced as they need to be agreed by Parliament beforehand. It is expected that the beta phase will commence in the late summer of 2024.
13. In the meantime, the Fund will work with the ISP on any preparatory work such as agreeing the matching criteria and data baselining/cleansing.
14. The Fund is liaising with the ISP to agree the matching criteria that will be used to locate members from the Fund's database. Current guidance from the Pensions Administration Standards Association (PASA) suggests the matching criteria should be date of birth, surname and national insurance number.
15. Additional criteria can be included to assist with matching such as address, postcode and other personal details including email and phone number.
16. Once the matching criteria is agreed the Fund can baseline and cleanse the specific data fields to ensure the maximum number of full matches are facilitated once dashboards are live.

Project Plan

17. The Fund will need to develop a detailed project plan to prepare for the implementation of dashboards. The plan will be developed over the coming months in liaison with the ISP.
18. One important step in the plan is to produce a Data Protection Impact Assessment (DPIA), to ensure all data security aspects have been considered before any data is shared with the dashboards.
19. The Fund completed and submitted a DPIA to the Council's Data Protection Officer (DPO) for approval on 2 January 2024 and received approval from the DPO on 8 February 2024.
20. The Fund will have to determine a budget for the pension's dashboard project. This includes ISP costs and potentially procuring data analytics services to assist with organising the data cleansing work and potentially consultancy services to help organise the project.
21. A full budget will be presented to the Committee once it is available.