

Dashboards – TPR publishes guidance and launches “deadline” campaign

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Introduction

On 22 June 2022, TPR published its [initial guidance](#) to help trustees prepare for dashboards. In an accompanying [press release](#), TPR launched its “deadline” campaign, urging trustees to take “action now” to ensure they are ready for their staging date, ie the date by which they need to comply with their dashboard duties.

Key points

- The guidance is based on draft regulations, which were consulted on earlier this year, and will be updated when the final regulations are published in the autumn.
- Trustees should start preparing for dashboards “as soon as possible”, regardless of their staging date.
- Key first steps for trustees include checking their staging date, liaising with their administrators, suppliers and advisers to understand how they can support the trustees, and deciding how to connect to the dashboard digital architecture.
- Trustees will also need to ensure that their scheme data is accurate and available digitally.

Background

The PSA21 sets out a framework for the introduction of a pensions dashboard service, a digital interface that is designed to enable individuals to see all their pensions information in one place. For trustees of schemes in scope (all registrable UK-based occupational pension schemes with 100 or more members, excluding pensioners), the detailed requirements are set out in [draft regulations](#), which were consulted on earlier this year. Under the draft regulations, trustees will need to:

- register their scheme with MaPS and connect to the “digital architecture” by their staging date
- ensure their scheme can receive both “find” requests (a request sent by the pension finder service to all schemes searching for a pension match) and “view” requests (a request to see the relevant pensions information)
- co-operate with MaPS when preparing to connect, maintain appropriate records and report certain information to TPR and MaPS.

What does the guidance say?

TPR's guidance is aimed at trustees or managers of schemes in scope of the draft regulations, to help them meet their dashboard duties. It is based on the current draft regulations and sets out:

- trustees' duties under the draft regulations
- steps trustees should be taking now to prepare
- a useful [checklist](#) to help trustees stay "on track" to meeting their duties.

The guidance will be updated later in the year to reflect the final regulations and will "evolve" in the future in light of dashboard experience. Regardless of a scheme's staging date, TPR "strongly" advises trustees to start preparing "as soon as possible".

Initial preparations

Staging date

Trustees should pinpoint their deadline for connecting to the dashboard "digital architecture". The draft regulations take a phased approach to compliance:

- large schemes (1,000 or more members, excluding pensioners) have a staging period from April 2023 to September 2024. Master trusts and personal and stakeholder schemes are expected to be among the first to connect, followed by DC schemes used for automatic enrolment
- medium schemes (100 to 999 members, excluding pensioners) have a staging period from October 2024 to October 2025.

Schemes with under 100 members, excluding pensioners, are not required to connect but can do so voluntarily if they wish.

There is a limited option for trustees to defer their staging date for up to 12 months if they are in the process of changing administrator and specific conditions are met. The DWP is expected to provide more information on the deferral process in the autumn.

Trustees should check their staging date when the final regulations are published, in case there are any changes to the timescales.

Liaising with others

Trustees should talk to their administrators, software providers, actuary and legal advisers "as soon as [they] can" to understand how they can support the trustees. Employers may also need to be brought into the loop, eg to help improve the availability and quality of personal data.

Trustees should also check that their providers will have enough capacity to help the trustees meet their dashboard duties, particularly if they have other clients with similar staging dates. Trustees may even need to engage new service providers or update existing supplier contracts, so this should be factored into their planning.

TPR reminds trustees that although they can use third parties to help meet their dashboard duties, the trustees remain ultimately responsible for compliance.

Connecting to the digital architecture

There are various steps that trustees must take before they can connect to the digital architecture, including:

- deciding how to connect (see below)
- registering with MaPS' Governance Register
- providing evidence, including through conformance testing, to show that the scheme's systems meet the standards and specifications set by MaPS.

Deciding how to connect

Trustees will need to choose a digital interface. Options include:

- using an interface built by the scheme's third-party administrator or software / IT supplier
- the trustees building their own interface if the scheme is administered in-house
- using an interface provided by a third-party integrated service provider ("ISP").

Trustees should talk to their administrators and software providers to understand their connection plans and assess whether this can meet the scheme's needs, or whether to engage an ISP. TPR cautions trustees who are considering building their own interface that it would be a "significant undertaking".

Preparing for find and view requests

Once connected, schemes must always be ready to receive both find and view requests.

Find requests

Once a find request is received, a scheme will have to complete "matching" to identify whether they hold information on an individual's pension that matches with that request. Under the current proposals, trustees will need to set their own data criteria for matching members to their pensions. The chosen criteria will depend on what data is available and how confident trustees are of its accuracy. Trustees should:

- audit their scheme data
- discuss with their administrators and other advisers which items are most suitable for the scheme to use, and
- put in place a plan to improve and / or digitise data, if needed.

View requests

Under current proposals, when a pension scheme receives a "view request", it will need to provide:

- administrative data – information about the scheme, administrator and relevant employment
- signpost data – a link to a website where the individual can find information about member-borne costs and charges, the scheme's SIP and implementation statement
- value data – accrued and projected pension values.

The value data that needs to be provided will depend on the member's status and the benefit type. Trustees will have to ensure that values provided are accurate, calculated in line with the legal requirements and sufficiently recent.

As a first step, trustees should ensure their data is in a good state (see above). Trustees will then need to work out how to provide the value data to members through the dashboard and TPR suggests that trustees liaise with their administrator and other providers to decide how to deliver this, particularly in cases where up-to-date data will not be available.

Failing to comply

Under the draft regulations, TPR will have discretion to issue penalties of up to £5,000 to individuals and up to £50,000 in other cases for any single instance of non-compliance.

TPR acknowledges that delivering pensions dashboards is a “huge challenge” for the industry and that it will use its powers “fairly and proportionately” looking at the particular circumstances of each case. Although TPR will be “pragmatic”, it will take action if it sees any “intentional or reckless non-compliance”.

Future publications

The guidance sets out the following timetable for further information and guidance:

Summer 2022

- Response to the [consultation](#) to be issued
- Draft set of “standards” to be published. These standards will put some flesh on the bones of the requirements in the regulations
- Additional guidance on early and voluntary connection.

Autumn 2022

- Final regulations published
- DWP application process for scheme deferral of connection deadline
- Consultation on TPR's compliance and enforcement policy for dashboards.

What's next?

TPR will contact all schemes at least 12 months before their staging date but, in the meantime, trustees should be pressing ahead with their preparations.

For any assistance with your preparations, or if you would like to discuss any of the above, **please speak to your usual Sackers contact.**

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