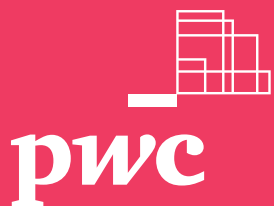




PDP – Data standards guide

Journey to becoming dashboard compliant





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Context/background

The Pensions Dashboards Programme (PDP) published the data standard guide (DSG) in December 2020. The guide provided, for the first time, a clear view on what data all UK pension schemes/providers will need to expose through Pensions Dashboards and importantly some key decisions that need to be made sooner rather than later e.g. the criteria for matching records.

This document has been produced to:

- provide a practical guide that anyone tasked with ensuring their scheme(s)/arrangements are 'dashboard compliant' can use;
- breakdown the work required into meaningful/logical stages, which would enable the project to be more manageable and importantly provide an audit trail/evidence to be produced. This can, in turn, support an independent governance process to scrutinise a stage before the project/programme can move to the next;
- suggest a sequence or order in which to approach the work necessary to become complaint;
- highlight key considerations that need to be thought through early in the process; and
- suggest ways in which the work needed to become dashboard compliant could be considered alongside some of the other major projects the pensions industry is facing (see Appendix 1 for more details) in the next 24-36 months. Many of the projects shown in Appendix 1 have interdependencies, predominantly related to data (it's availability, quality, etc.) and as such, where possible, this document will identify such dependencies and suggest how they can be managed/mitigated or even where

opportunities exist to converge aspects of these projects to deliver greater value/avoid repetition of work.

The PDP has divided the UK pensions landscape into 12 sub-sectors (see Appendix 2). This document has been designed to cater for 11 of those 12 sub-sectors (like the DSG, this document excludes sub-sector 1, DWP). This document will though be of most assistance to those who have responsibility for Defined Benefit schemes (Statutory or trust based), as it also takes account of some of the other major challenges being faced by these types of schemes as referenced in Appendix 1.

Additionally, this document tries to consider the different challenges/requirements stemming from a range of operating models e.g. single system through to multiple systems, all data held 'on system' through to a mix of non-digital and digitally held data, etc., as well as how those schemes are administered e.g. in-house, outsourced, through an insurance/investment management company, Master Trust, etc. By their nature each operating model will be unique and as such this document may not cater exactly for the one the reader is engaged with, so care needs to be taken when using this document.

This document will be developed/maintained as and when further versions of the DSG are published, where legislation is passed or when other aspects of the Dashboards programme are confirmed. For example, when:

1 Details of staging i.e. will schemes/providers be 'onboarded' and when, are determined.

2 Details of how data will be provided into the ecosystem.

3 The response time(s) for matching/providing data are known.

4 Details of ongoing PDP and/or Pensions Regulator ongoing monitoring are known.

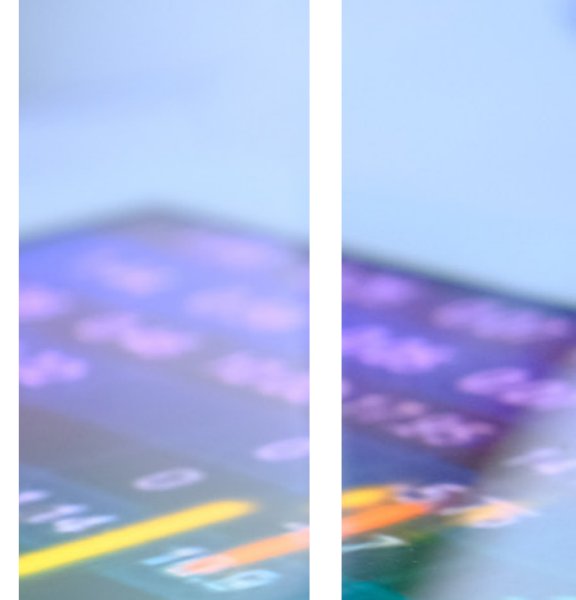
5 Any guidance is provided relating to GDPR.

Given the effort required to become 'Dashboard compliant' and the fact that:

- some of the requirements are not yet defined, and;
- there are competing priorities from the projects (see Appendix 1) which must also be undertaken at the same time;
- the document sets out some suggested timescale to have completed the various stages of the work that needs to be undertaken.

The underlying assumption with this document is that the reader has read the PDP DSG thoroughly and any other relevant documents published by PDP, so they understand the terminology, requirements, etc. from the outset. This document will not provide an explanation on any terms or requirements that the PDP has already published.

The other assumption made throughout the document is that the reader is proficient as a Pensions Professional, so certain terms (e.g. Scheme Pays) are not defined.



Stage 1

Determining the starting point

Each scheme's/provider's starting point will be different, so the first activity to undertake, if not already clearly understood, is to determine that starting point. The more it is understood and documented, the more the project/programme can have confidence in moving through the various stages that follow, so it is worth being thorough and documenting the starting point (this may also benefit some of the other projects that are underway/need to be undertaken over the same period – again refer to Appendix 1 for more details of these other projects).

The intention of this section of the document is to be as comprehensive as possible, but clearly given the unique position of each scheme/provider there may be other areas to be considered, so care should be taken to consider all aspects of the existing operating model.

Requirement

Identify where the data that needs to be exposed on the Pensions Dashboards is currently held/stored

Considerations

- How many systems which hold data are in live operation?
- Is any data held on a legacy/archive system?
- Where data has been migrated from one platform to another, what was the stance taken on migrating 'old' data (like EPB only members) e.g. skeleton records only?
- To what extent is data held off system e.g. are records held on microfiches, paper records, images of documents, spreadsheets, etc.
- Who 'owns' the database on which the data is stored?
- Who are the parties responsible for the data (e.g. who is the data controller and data processor for the various data sets?)

Rationale

- May need to extract data from multiple platforms – could result in need to build holding databases/middleware
- The provision of data must be electronic and it may well need to be 'instant'
- May need to digitise/migrate data on to main administration system(s)
- Some databases are administered and maintained by third parties – particularly for older insurance products
- Understanding the roles and responsibilities for the data in question will ensure the appropriate parties can make decisions

Impact

- May need to allow more time to obtain, 'read' and load data onto core administration system(s)
- Costs are likely to be higher if there are multiple platforms/data is held off system
- More difficult to obtain and interrogate the data if owned/maintained by a third party so early engagement might be necessary ensuring the correct approvals/decisions can be taken in a timely manner

Outcomes/outputs

Clear understanding over:

- Scale, scope, effort and cost of any data onboarding
- The need to migrate/digitise data
- The need to create holding databases/middleware/'Single View of Client'
- The need to transition data from third parties or to agree how that data will be provided to Pensions Dashboards
- What approvals/decisions will be required by various stakeholders

Requirement

Understand how accessible, electronically, the data is held

Considerations

- How much data is not electronically accessible and who and what data does this issue affect
- Is the data that is held electronically easily accessible e.g. is the database Open Database Compliant (ODBC)/do APIs exist to expose that data?
- What data is held by third parties and how accessible is this information (e.g. external AVCs)?
- Are previously calculated values readily accessible (e.g. re-using last calculated ERI)?

Rationale

- Where data is not easily accessible (e.g. held on a mainframe system or a proprietary database), a solution will be needed to extract/expose this data to the Dashboards
- It may be more straightforward to use previous values (e.g. from last benefit statement) to meet future dashboard requirements

Impact

- Specialist skills may be needed to build extraction solutions – these skills may be scarce and/or expensive
- May need to allow more time to get data ready to be exposed on the Dashboards
- May need to redesign existing processes to save results so that they can be made available to dashboards

Outcomes/outputs

Clear understanding over:

- The need to enhance the existing technology infrastructure to allow data to be easily exposed on the Dashboards
- Scale, scope, effort and cost of making the data electronically accessible

Requirement

Understand how Pensions Dashboards may impact your future engagement strategy

Considerations

- What future changes are planned to communications/portals over the next 18 to 36 months?
- How are existing members expected to interact with the services (e.g. channel shift) and how may this change the data held (e.g. capturing mobile and email data)?
- How would queries stemming from Pensions Dashboards be handled by the current operation?

Rationale

- Considering how the requirements impact future/planned engagement projects
- Understand the changes in the way the operation will interact with members to minimise the impact of future Pensions Dashboards queries

Impact

- Depending on the proposed changes, it may be necessary to expand the scope of data that will be examined in the Find data analysis (i.e. mobile/email data may need to be included) and this may also mean expanding the data used in the 'Find' process

Outcomes/outputs

Clear understanding over:

- How the existing operating model may change in terms of the Find data requirements

Requirement

Determine if members have more than one record and establish who this affects and why?

Considerations

- If a member leaves and re-joins how are their 'old' and 'new' periods of service/contributions held?
- How have buy-in records been dealt with on the system (is there a shadow record/database)?
- Has the method selected for GMP equalisation created dual records?

Rationale

- It is vital to ensure the correct benefits are provided into the ecosystem and as such clear decisions will be needed in relation to the treatment of multiple records/benefits

Impact

- A clear set of rules may need to be established to ensure only those correct benefits are provided into the Pensions Dashboards ecosystem

Outcomes/outputs

Clear understanding over:

- What members have multiple records and why
- How such members' data must be treated to ensure the correct data is provided to Pensions Dashboards

Opportunities through project interdependencies:

1. In order to equalise GMPs a number of system updates will be required (possibly including the 're-tranching' of benefits). When making the system updates it will be important to ensure the benefits are in a format that can be provided to Pensions Dashboards, otherwise they may need to be revised at a later date, creating unnecessary work.
2. The Lloyds judgements may require no-liability records to be re-created/enhanced. The work required for Pensions Dashboards could therefore present an opportunity to undertake a wider review of data, thus saving both time and money in the future. The advice therefore would be to revisit the above based on the requirements of the Lloyds judgement.
3. If a decision is taken to develop calculations so certain benefits (e.g. ERI) are more 'relevant' or aligned to the requirements of the DSG, this could provide an opportunity to automate other calculations e.g. the Lloyds judgement may require transfer value bases to be re-programmed. Combining these requirements may provide an opportunity to obtain better value for money from a system provider, have ring-fenced resource made available to deliver the functionality, etc.

At the end of Stage 1, the information now available should help with several follow on activities, such as:

1. Clearly understanding and articulating the key decisions/actions that must be taken;
2. Constructing a business case for funding and resources for the initial actions in resolving data challenges faced;
3. Sharing detailed knowledge of the current operating model;
4. Providing factual evidence of the challenges of becoming 'Dashboard compliant' to key stakeholders;
5. Assessing the risks (and considering mitigating actions) relating to:
 - a. the project;
 - b. the ongoing operation post go-live of the Pensions Dashboards;
6. Highlighting key dependencies both within this project or resulting from any other projects that must be undertaken over the same timeframe (i.e. those referenced in Appendix 1, plus any others that are planned/need to be undertaken);
7. Being able to undertake detailed and informed planning;
8. Being able to engage with other stakeholders e.g. outsourced provider, pensions administration system provider, etc. over requirements and thus understand their costs, timescales, requirements, etc.





Stage 2

Analyse 'Find' data

The DSG sets out a number of data items that will be sent to schemes/providers to enable them to match (or find) an individual's pension entitlement(s). The DSG makes it clear that each scheme/provider will determine the manner in which it will use some/all of the 'find' data items to match with their own records.

This presents an element of risk which needs to be carefully managed through a factual assessment over the completeness/reliability of the data held.

Requirement

Determine the membership population that will be within scope of the Pensions Dashboards

Considerations

- How easily can 'in scope' members be identified?
- How easily can 'non-UK pension arrangements' be removed?
- How will members who have forfeited benefits (see Note 1 below) be treated?
- The 'Scope' of members according to the DSG talks about uncrystallised pensions, but would untraced members due a refund be included?

Rationale

- Members not in scope must be excluded from the Dashboard ecosystem
- Members who have previously forfeited benefits may challenge the fairness of that decision
- Some members may be due benefits other than a pension and the Pensions Dashboards provide an opportunity to pay such outstanding benefits

Impact

- Depending on the underlying structure of the database(s) it may be necessary to reorganise/enhance them to enable only the correct data to be made available to the Dashboards
- Potential for forfeited members to raise complaints/seek Pensions Ombudsman support

Outcomes/outputs

- Clear understanding over:
- What members are/are not in scope
 - How members not in scope will be excluded from the 'find' population
 - How to treat members who have forfeited benefits or are due refunds

Requirement

Determine which data elements in the 'find' data are currently held

Considerations

- Based on current practice/knowledge are data elements such as Email (Ref 1.018) or Mobile number (Ref 1.020) currently held?

Rationale

- If certain 'find' data elements are not held they can be excluded from the assessment of the quality of that data

Impact

- Excluded such data elements early in the process will save time and effort in building routines to extract/examine them

Outcomes/outputs

- Clear understanding over:
- Which data elements to include in the assessment and which can be excluded



Requirement

Determine the matching criteria to be used

Considerations

- What matching criteria is used through other channels e.g. how is a member ID&V through the telephony channel?
- What matching would have to be achieved before data could be shared to dashboards (e.g. risk tolerance)?
- To what extent, if any, would the assertion of data influence the matching process?
- How frequently is email and mobile recorded to support matching?
- What sophistication in existing matching processes are used (e.g. identify transposed data, common misspellings)?
- How much confidence is there to match using Alternate name (1.008) or to an old Postcode (1.015)?

Rationale

- Detailed understanding of existing processes and informed decision on matching based upon data quality
- Assessed all potential combinations and clearly defined when data can be released (e.g. a positive match)

Impact

- Minimise the risk of false positives (e.g. incorrectly returning a match to the wrong individual) whilst ensuring a high rate of positive matches

Outcomes/outputs

Clear understanding over:

- The criteria for matching which includes levels of confidence before information is shared with Pensions Dashboards

Requirement

Determine the quality/completeness of the 'find' data for the membership population in scope

Considerations

- How complete is each 'find' data item?
- How accurate is each 'find' data item and can this be assessed?
- How often and how is the data checked for accuracy?
- To what extent are missing items affecting a particular membership status?
- Is data prior to a specific date (e.g. when a new administration provider was implemented, etc.) more prone to having missing data items, etc.?
- To what extent are the 'find' data items stored incorrectly e.g. is the format of the NI number (Ref 1.004) correct, is Postcode (Ref 1.015) always populated correctly or have say any of the Address lines (Ref 1.010 – 1.014) been used to store Postcode, etc.

Rationale

- It will not be possible to have confidence in the decisions needed to agree on the process for matching members if the data is incomplete/unreliable
- The risk of either missing members' entitlements or worse exposing incorrect benefits is heightened
- Enables a clear understanding of the effort to cleanse 'find' data to be determined

Impact

- May need to allow time, resources and funding to resolve data issues with 'find' data

Outcomes/outputs

Clear understanding over:

- A proposed method of creating the underlying 'find' criteria
- Effort and funding required to resolve data issues

Requirement

Determine rules for partial matching of data elements

Considerations

- What is the minimum combination of partial matching of data elements that would allow data to automatically be shared?
- What process would be followed if the minimum combination of matching of data elements was not met – just ignore/not provide any data, refer for decision, etc.?
- To what extent would the matching of Mandatory data elements override any mismatches with Conditional data elements?
- To what extent would Asserted data have on the partial matching process?

Rationale

- A clear set of rules must be determined to allow the system(s) to automatically determine if the matching criteria have been met

Impact

- If the rules are too strictly determined, valid members will not receive details of their benefits and/or it will demand more human intervention to make decisions on borderline cases which could mean a greater impact on the day-to-day running of the operation
- If the rules are too loosely determined, data not relating to that individual may be released incorrectly, which could well lead to data breach issues

Outcomes/outputs

Clear understanding over:

- The rules for handling partial matching of data elements
- The effort to develop and test the rules

Note: Depending on how such rules perform in 'live' operation, it may be necessary to adjust them and as such allowance should be made to review and revise such rules in the early stages of live use

This Stage 2 analysis will need to be rerun regularly (and indeed some aspects will form the basis for the ongoing 'find' service), whether this is:

1. To check on the progress being made under Stage 1 e.g. where data is being onboarded from non-digitally held sources, etc.; and/or
2. Through the ongoing maintenance of the data (e.g. where someone advises of a name change through marriage or has a BCE, etc.).

As such, a schedule for regularly re-assessing this analysis should be put in place (both prior to and after the introduction of Dashboards). It is therefore recommended that this analysis process is easily repeatable and consistent, preferably through an automated scheduled routine.

At the end of Stage 2, using the findings from the analysis undertaken, it should be possible to:

1. Present a clear case for which data items will be used to match the 'find' data provided by the Pensions Dashboards ecosystem and seek approval from key stakeholders based on the analysis/evidence provided;
2. Present a case for dealing with partial matches;
3. Articulate the risk appetite for records where only some of the data items can be matched (e.g. address or name changes not matching Find data received by the Pensions Dashboards ecosystem)?
4. Create a plan to try to source missing data (potentially by looking back at microfiche, paper records, images, etc.) and/or rectify any data discrepancies.

Note 1 – Forfeiture

Some pension arrangements have clauses in their TD&R which result in members benefits being forfeited if the arrangement has not been able to trace them after a certain period has elapsed from the point at which the benefit was payable (e.g. 6 years after normal pension age). Until a BCE event occurs these members must, according to the DSG, have their data exposed on Pensions Dashboards and as such it is likely that these members will seek payment of those benefits only to be told they are no longer entitled to them. This in turn will give rise to complaints, potentially damaging the reputation of the arrangement and possibly even lead to legal action. If such a clause exists legal advice should be obtained (and it is recommended that this is sought early to allow any decision to be taken into account in the preparation stages) to determine how to treat such members.



Stage 3

Analyse 'View' data

The DSG sets out a wide array of data (under three sub-categories) that should be made available through the Pensions Dashboards ecosystem. Some of these data elements will require careful consideration in terms of what is shown and at what date it relates to.

Requirement

Determine the extent to which mandatory data elements are/are not populated

Considerations

- What is the scale of missing mandatory data items?
- Does the mandatory missing data affect a particular status or type of member?
- Can a default value be used if the mandatory data item cannot be created?

Rationale

- Where data is not currently available, it will be necessary to decide how to create these mandatory data items or whether a default value could be provided

Impact

- May need to allow time to create/cleanse missing mandatory data elements

Outcomes/outputs

- Clear understanding over:
- The extent of missing mandatory data and thus the effort and cost to rectify the issue
 - Whether a default value may need to be used in some circumstances

Requirement

Determine what data elements will be needed to derive certain values required in the 'view' data e.g. Pension status (Ref 2.005) has 'fixed values' of Active ('A') or Inactive ('I'), so data elements such as contribution history, status, etc. may be needed to derive this value

Considerations

- What data elements are needed to derive values?
- What business rules would be applied to derive the values?

Rationale

- Depending on requirements of the mandatory data element, it may be necessary to consider several different data elements and how these could be used to derive values

Impact

- This could be a complex process depending on the nature of the value to be derived and the data stored in the data elements that will be used to derive values, so early investigation/analysis may be needed

Outcomes/outputs

- Clear understanding over:
- What data items will be needed to derive values

Requirement

Determine the extent to which fields that will be needed to derive certain other values are populated and up to date

Considerations

- To what extent are these data elements correctly populated?
- Are these data elements up to date?

Rationale

- If data elements are missing, it may not be possible to derive a value or that value may be incorrect
- Relying on data that is out of date may result in incorrect values being derived

Impact

- Potential to impact on business as usual operations to ensure data is maintained in a timely and accurate manner
- May result in more effort to cleanse/update data
- May result in more complex rules needing to be developed to ensure values are 'correct' or reasonable

Outcomes/outputs

- Clear understanding over:
- The extent of missing data elements and the impact this has on creating derived values and also the effort and cost to rectify the issue/develop workarounds

Requirement

Decide whether new fields will be created for storing any derived data elements or whether they will be calculated 'on demand'

Considerations

- How easily and quickly can the derived data elements be created?
- How static is the data needed to derive the data elements and thus how often might such derived data elements change?

Rationale

- It may be more efficient to derive, and store certain data elements needed for Pensions Dashboards

Impact

- More time, effort and funding may be required to calculate derived data elements
- Underlying database may need to be developed to cater for new fields

Outcomes/outputs

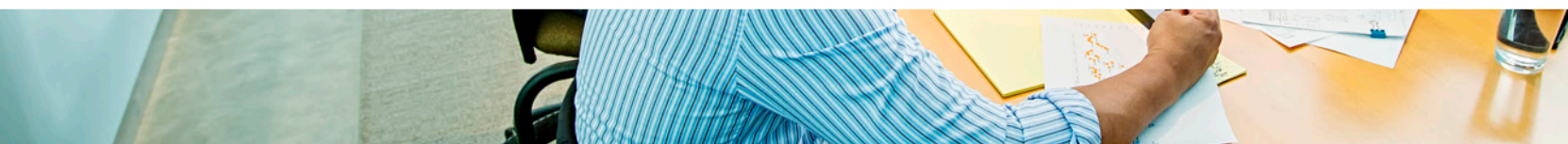
- Clear understanding over:
- The most appropriate way of dealing with data elements that are not currently held and need to be derived

This Stage 3 analysis will need to be rerun regularly and as such, a schedule for regularly re-assessing these data elements should be put in place (both prior to and after the introduction of Pensions Dashboards). It is therefore recommended that this analysis process is easily repeatable and consistent, preferably through an automated scheduled routine.

At the end of Stage 3, using the findings from the analysis it should be possible to:

1. Create a plan to try to source missing data (potentially by looking back at microfiche, paper records, images, etc.) and/or rectify any data discrepancies;
2. Decide how to create/derive certain data elements needed for Pensions Dashboards.





Stage 4

Determine treatment of certain ‘View’ Data elements

As the ‘View’ section of the DSG is complex and critical to the provision of information to Pensions Dashboards, the tables that follow examine specific ‘data elements’ in further detail. Only those data elements which, in our opinion, may present an issue or require decisions to be made have been referenced in the tables below. Depending on feedback, these may be extended where required.

Note: Where data elements are Conditional, an assumption has been made that if such data was not held or confidence in the quality of that data was low, the data element would not be provided into the Pensions Dashboards ecosystem.

Sub-category: Pension arrangement details

Requirement	Pension status (Ref 2.005), requires a decision to be made over whether a member is still actively building up the pension		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> For DC arrangements what time period after receipt of the last contributions should be allowed before a member is deemed as 'I – Inactive'? 	<ul style="list-style-type: none"> Rules will need to cater for low/variable earners within AE arrangements, those that have opted out and those that have not yet been Auto Enrolled Members who are 'incorrectly' defined may challenge their status 	<ul style="list-style-type: none"> Unnecessary calls/complaints could be received which increase workload and could result in the need to amend the system rules 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> The rules that will be developed to determine Pension Status and thus what effort will be required to develop and test them
Requirement	Pension start date (Ref 2.006) should be available, but the exact date of when someone started to build up their pension may not be known		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> If an exact date is not known or an incorrect date is held, how would a default date be determined? 	<ul style="list-style-type: none"> This is a Mandatory data element and as such a date must be provided 	<ul style="list-style-type: none"> Little impact, unless member does not agree with or understand the rationale for the default date provided 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> How to determine a pension start date where an exact date is not known or an incorrect date/default date is held
Requirement	Pension retirement date (Ref 2.007), whilst being a Conditional data element could be derived if missing and as such a decision may needed to provide a value		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> Would a date be provided if not held? What 'default' age would be used to derive a date? What date should be used where different pension tranches would be treated differently at different dates? and Would it be best to leave unpopulated if a member has multiple pension values or tranches that can be taken at different dates? 	<ul style="list-style-type: none"> Members may want to understand at what point they are able to access their pension 	<ul style="list-style-type: none"> With no date provided, members may contact the service resulting in higher workload 	<p>Clear understand over:</p> <ul style="list-style-type: none"> Whether to provide and how to determine a retirement date

Requirement

Pension link (Ref 2.008) requires the linking of pensions arrangements via a pre-determined reference

Considerations

- What benefits will need to be shown as linked e.g. AVC to main scheme, difference periods of service, top up scheme with main scheme, etc.
- What reference will be used to link the benefits?

Rationale

- Benefits, if not linked properly, will be confusing to the member when displayed on their Pensions Dashboards

Impact

- The linking, and thus displaying of pension benefits needs to be logical and clear, else the data displayed will confuse the member and could lead to an increase in queries

Outcomes/outputs

Clear understanding over:

- The different benefits which need to be linked
- How a linking reference will be determined
- How to display linked benefits in a logical and clear manner

Sub-category: Pension Administrator details

Requirement

What administrator name/contact details should be used?

Considerations

- To what extent do members know who the actual administrator of the arrangement is?

Rationale

- Some members may not know what actually administers their pension

Impact

- If the information provided is not clearly understood it may confuse the member/ they may not recognise the pension entitlement leading to an increase in queries

Outcomes/outputs

Clear understanding over:

- What information would be disclosed through the Dashboard regarding the administrator

Requirement

What channel is going to be the preferred contact preference?

Considerations

- Which channel will help the member answer their specific questions?

Rationale

- Members may want/need to contact the administrator to raise questions, seek further information, etc.

Impact

- The channel choice may result in the administration team being 'overwhelmed' with queries and/or the member's experience of the service leading to frustration/complaints

Outcomes/outputs

Clear understanding over:

- Which channel to promote as the preferred method of members communicating with the administration taking in to account demand, member experience, etc.

Sub-category: Employer details

Requirement

Employer name (Ref 2.201) and Employment dates (Ref 2.202 and Ref 2.203) require decisions to be made if the data is incomplete

Considerations

- Which details will help the member identify their Employer?

Rationale

- Employer details may have changed over time or the Parent Company name may not be recognised by the member.

Impact

- This data may help the individual recognise the pension benefit if employment information can be provided.

Outcomes/outputs

Clear understanding over:

- Consider what data to display where there are multiple employments related to the pension (e.g. master trust).

Sub-category: Estimated Retirement Income (ERI) data

Requirement	ERI type (Ref 2.301) will potentially require multiple values to be determined/displayed e.g. Pension, AVC and additional lump sum, so each value must be handled correctly and consistently		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> Are the benefits that need to be provided clearly identifiable against the 'Fixed values' shown? 	<ul style="list-style-type: none"> Members will need to clearly understand what each value shown on their Pensions Dashboards represents 	<ul style="list-style-type: none"> If members are confused about the values that are shown on the Pensions Dashboards, there is likely to be an increase in queries 	Clear understanding over: <ul style="list-style-type: none"> Which benefits will be assigned to which 'Fixed values'
Requirement	ERI payable date (Ref 2.304), could be derived if missing and should this be the same as Pension retirement date (Ref 2.007) for consistency		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> What 'default' age would be used to derive a date? Should this differ from the date shown in Pension retirement date (Ref 2.007) and if so would that cause confusion? How will different tranches of benefits with different dates be managed? How is payment date for different tranches currently displayed on benefit statements? 	<ul style="list-style-type: none"> Members may want to understand at what point they are able to access their pension 	<ul style="list-style-type: none"> If a different date is shown to that of Pension retirement date (Ref 2.007) the member may be confused and therefore raise a query 	Clear understanding over: <ul style="list-style-type: none"> How to determine a ERI payable date (Ref 2.304) if one is not present Whether to use the same value as shown in Pension retirement date (Ref 2.007)



Requirement

The ERI basis (ref2.304) for calculating an ERI amount (ref 2.305) will need to be determined

Considerations

- Is there already a well-established and consistent basis?
- What basis will be used to calculate the amount if the member has to make decisions at retirement which would influence the amount e.g. for some Public Sector schemes due to the impact of the McCloud judgement (or similar ruling depending on scheme) allows the member to choose the benefit bases at the point of retirement
- Would such member decisions result in a different ERI basis (Ref 2.302) being needed to be adopted e.g. 'BS' rather than 'BSF' and would this require additional development?
- How should the ERI basis change for those close to (or older than) the retirement date?
- Mixed benefit schemes and the treatment of pensions with DB and DC benefits? How should they be displayed on dashboards?

Rationale

- The amount quoted must be a reasonable representation of the amount the member could receive at the ERI payable date (Ref 2.304). If this date is close, the accuracy of the value provided could determine if a member decides to retire, etc.

Impact

- Without careful consideration, the value quoted may be too low or too high – both resulting in unintended consequences for a member deciding whether to retire
- Additional system development work maybe required if the current method of calculating retirement benefits is not 'reliable'

Outcomes/outputs

Clear understanding over:

- How the amount shown is calculated and to what extent it can be relied upon
- The need to undertake further system development work and the effort and cost of such activities



Requirement

How should the ERI information be provided?

Considerations

- Should the ERI be recalculated for each pensions dashboards request? If so should this be on a periodic basis (e.g. annual process) or on demand?
- Should the ERI be taken from previously calculated results (e.g. benefit statement or other bulk process)?
- If previous information is being reused is this data accessible?
- How should manual exceptions be managed (e.g. can results be saved for re-use for future requests)?

Rationale

- Understand the approach to providing ERI information and whether existing information can be re-used

Impact

- There may be a need to create new processes or redesign existing processes in order to be able to make the information available for dashboards

Outcomes/outputs

- Agreed approach for the provision of ERI information
- Begin to understand what changes are required to provide ERI information



Requirement

ERI unavailable (Ref 2.308) enables a reason to be returned where ERI data cannot be calculated

Considerations

- To what extent can one of the 'Fixed values' codes be defined for members?
- How many members does this affect and why?
- What actions can be taken to minimise the ERI unavailable 'Fixed values' being returned?
- To what degree will it be necessary to interrogate the workflow system/periodic DC process to determine if the 'TRN' 'Fixed value' code needs to be used?
- Will the use of this code be pre-determined and stored on the members record or calculated at the point of need?
- If a code is pre-determined and stored on the database what would be the process for validating this still applies periodically e.g. following a data cleansing exercise
- Recognising many of the ERI data elements are Mandatory, if the ERI is unavailable what default values will be supplied, particularly for data elements which relate to dates or pre-determined values i.e. ERI type (Ref 2.301), ERI basis (Ref 2.302), ERI calculation date (Ref 2.303) and ERI payable date (Ref 2.304)

Rationale

- The method of deriving this value may place demands on the system
- The re-validation of codes will be needed to prevent members who could have ERI data provided (due to data cleansing and/or better system functionality) from not being provide
- Default values for Mandatory fields will need to be determined and should not confuse the member e.g. using a dummy date of 01/01/2000 may result in queries, using 'SMPI' for ERI basis (Ref 2.302) should not be used as a default for a DB scheme, etc.

Impact

- The use of the ERI unavailable (Ref 2.308) data element is almost inevitably going to lead to member queries

Outcomes/outputs

Clear understanding over:

- The circumstances under which an ERI unavailable (Ref 2.308) code would be returned
- How many members could be affected and what actions could be taken to reduce this number, along with some view on effort and cost of rectification
- What default values to use for other data elements and for these to be 'logical'



Sub-category: Accrued pension data

Requirement	Accrued type (Ref 2.401) will potentially require multiple values to be determined/displayed e.g. Pension, AVC, additional lump sum, etc. so each value must be handled correctly and consistently		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> • Are the benefits that need to be provided clearly identifiable against the 'Fixed values' shown? 	<ul style="list-style-type: none"> • Members will need to clearly understand what each value shown on their Pensions Dashboards represents 	<ul style="list-style-type: none"> • If members are confused about the values that are shown on the Pensions Dashboards, there is likely to be an increase in queries 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> • Which benefits will be assigned to which 'Fixed values'
Requirement	Accrued calculation date (Ref 2.403) requires a date to be provided for DC arrangements and may be provided for DB		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> • To avoid queries from DB members, should an accrued calculation date (Ref 2.403) always be provided and if so, how will this date be determined? 	<ul style="list-style-type: none"> • Members will want to understand at what point the accrued values provided relate to e.g. date of leaving, 'today's' date, etc. 	<ul style="list-style-type: none"> • Without providing a date, members may raise queries. • Further system development work may be required if a date is not held 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> • Whether to provide an Accrued calculate date (Ref 2.403) and if so how to derive it
Requirement	Accrued payable date (Ref 2.404) requires a date to be provided for DC arrangements and may be provided by DB		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> • To avoid queries from DB members, should an Accrued payable date (Ref 2.404) always be provided? • Will this date be the same as the dates shown in Pension start date (Ref 2.006) and Pension retirement date (Ref 2.007) and if not what date would be provided? 	<ul style="list-style-type: none"> • Members will want to know at what date they are able to receive the accrued pensions shown 	<ul style="list-style-type: none"> • Without providing a date, members may raise queries • Further system development work may be required if a date is not held • If the date is not consistent with Pension start date (Ref 2.006) or Pension retirement date (Ref 2.007) members may raise queries 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> • Whether to provide an Accrued payable date (Ref 2.404) and if so how to derive it • Whether the date provided is consistent with other dates already provided
Requirement	Accrued amount (Ref 2.405) must be provided for a DC arrangement and may be provided for DB		
Considerations	Rationale	Impact	Outcomes/outputs
<ul style="list-style-type: none"> • Will an Accrued amount (Ref 2.405) be provided for DB members? • On what basis will this amount be determined for DB members e.g. at the time of leaving, revalued to 'today's' date, etc.? 	<ul style="list-style-type: none"> • The provision of ERI amount (Ref 2.305) may suffice for members, but some may want to understand the current value of their benefits. 	<ul style="list-style-type: none"> • Without providing this information for DB members, more queries may be received 	<p>Clear understanding over:</p> <ul style="list-style-type: none"> • Whether to provide an amount for DB members and if so the basis for the value to be shown

Requirement

Accrued unavailable (Ref 2.407) enables a reason to be returned where ERI data cannot be calculated/is not relevant

Considerations

- To what extent can one of the 'Fixed values' codes be defined for members?
- How many members does this affect and why?
- What actions can be taken to minimise the 'Fixed values' being returned?
- To what degree will it be necessary to interrogate the workflow system/periodic DC process to determine if the 'TRN' 'Fixed value' code needs to be used?
- Will the use of this code be pre-determined and stored on the members record or calculated at the point of need?
- If a code is pre-determined and stored on the database what would be the process for validating this still applies periodically e.g. following a data cleansing exercise?

Rationale

- The method of deriving this value may place demands on the system
- The re-validation of codes will be needed to prevent members who could have Accrued data provided (due to data cleansing and/or better system functionality) from not being provided

Impact

- The use of the Accrued unavailable (Ref 2.407) data element may lead to member queries

Outcomes/outputs

Clear understanding over:

- The circumstances under which an Accrued unavailable (Ref 2.407) code would be returned
- How many members could be affected and what actions could be taken to reduce this number, along with some view on effort and cost of rectification

Sub-category: Additional data (Signposts)

Requirement

Costs and charges (Ref 2.501) requires a URL to be provided

Considerations

- Is this information already available on-line?
- What process will be needed to ensure the URL link is maintained/updated as and when the costs and charges change?

Rationale

- This information must be provided on-line if available

Impact

- A 'broken' URL link will only result in queries being raised by members

Outcomes/outputs

Clear understanding over:

- The effort needed to make the information available on-line if necessary
- The process to maintain/update the URL as the costs and charges change

Requirement

SIP URL (Ref 2.502) requires a URL to be provided

Considerations

- Is this information already available on-line?
- What process will be needed to ensure the URL link is maintained/updated as and when the costs and charges change?

Rationale

- This information must be provided on-line if available

Impact

- A 'broken' URL link will only result in queries being raised by members

Outcomes/outputs

Clear understanding over:

- The effort needed to make the information available on-line if necessary
- The process to maintain/update the URL as the SIP changes

Requirement

Implementation statement URL (Ref 2.503) requires a URL to be provided

Considerations

- Is this information already available on-line?
- What process will be needed to ensure the URL link is maintained/updated as and when the costs and charges change?

Rationale

- This information must be provided on-line if available

Impact

- A 'broken' URL link will only result in queries being raised by members

Outcomes/outputs

Clear understanding over:

- The effort needed to make the information available on-line if necessary
- The process to maintain/update the URL as the implementation statement changes

Requirement

Annual report URL (Ref 2.504) requires a URL to be provided

Considerations

- Is this information already available on-line?
- What process will be needed to ensure the URL link is maintained/updated as and when the costs and charges change?

Rationale

- This information must be provided on-line if available

Impact

- A 'broken' URL link will only result in queries being raised by members

Outcomes/outputs

Clear understanding over:

- The effort needed to make the information available on-line if necessary
- The process to maintain/update the URL as the Annual report changes

Many of the values and dates required by the DSG may not be readily available and this therefore raises a question over whether to generate the required values at the point of need or perform an annual exercise to calculate and store such values e.g. perhaps by expanding an annual process e.g. pension increases, benefit statements, etc. Both have pro's and con's and perhaps it is difficult at this stage to determine which option is best, and only once the provision of data into Pensions Dashboards is 'live' will a clear view of the impact on the operation of providing 'missing' data/dealing with member queries become available.

At the end of Stage 4, using the findings from the analysis it should be possible to:

1. Clearly define the best approach for providing this information;
2. Understand what changes are required to make View information available to dashboards.



Appendix 1

Other projects

As well as becoming 'Dashboard compliant', the UK pensions industry must successfully deliver the following projects over the same period (2020 to 2023):

GMP rectification:

Schemes which contracted out of the state scheme had to provide an equivalent benefit known as a Guaranteed Minimum Pension (GMP). HMRC required all Schemes to check (reconcile) the GMP values they had calculated against HMRC records as it planned on stopping these checks. Whilst the deadline has now passed, many Schemes are still trying to reconcile and then rectify GMPs.

GMP equalisation:

As a result of a judgement (Barber) in May 1990, pensions were deemed as pay and thus males and females had to receive the same pension benefits. Schemes equalised most tranches of benefits, except GMPs as there was no guidance. DWP only recently provided such guidance and Schemes are now embarking on a project to equalise GMPs and rectify benefits accordingly.

McCloud judgement:

As a result of the Hutton reforms, the Government introduced new pension arrangements in 2014-2015 for all Public Sector schemes. A recent case (bought by McCloud) determined that the reforms were illegal on the basis of Age discrimination and thus all Public Sector schemes must now revise their pension terms and rectify (and compensate) all members who were affected.

Lloyds judgements in respect of GMP equalisation and transfer payments ('Transfer rectification'):

A very recent legal decision has determined that members who transferred their benefits without the Scheme having equalised GMPs are entitled to any enhancement to the value transferred as a result of equalising their GMPs. This judgement now requires Schemes to review 30 years of transfer value payments and to determine if any additional payment is due. This further complicates the **GMP equalisation** process mentioned above.

Pensions Agenda

Scheme(s)/arrangements will also need to consider the other projects they may want/need to undertake over the next 24 to 36 months. This could include risk reduction exercises, tri-annual valuations, supplier re-procurement exercises, contract renegotiations with existing suppliers, etc.

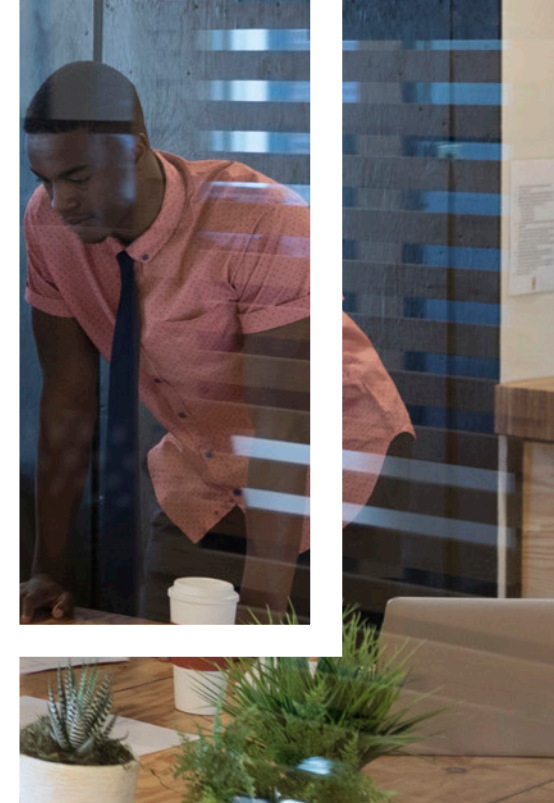




Appendix 2

PDP's definition of the UK pension landscape

1	2	3	4	5	6	7	8	9	10	11	12
State pension	Pension protection fund and FAS	Public sector scheme		Defined benefit trust		Defined contribution trust			Personal pensions		Buy out policy
		Unfunded	Funded	In-house	Outsource	Single employer	EPPs and RSSs	Master trust	Group	Individual	Various



Appendix 3

Illustrative timelines

The timelines shown below are illustrative. The characteristics of each are included so the reader can understand why the timescales differ. They are meant to provide example of potential best-case and worst-case scenarios to provide the extremes of timescales that may be encountered. Clearly the actual time taken will be specific to each arrangement.

The timelines cover only the activities needed to get the data ready (and any associated system functionality/enhancements needed) to be provided into the Dashboards ecosystem, but other activities will be required once further guidance is provided e.g. how the data will be received/sent, what encryption will be used, etc.

Best case scenario

Characteristic	Description
Number of systems?	All data is held on one core administration system
Data repository?	All data is held digitally – no data exists ‘off system’ e.g. on microfiche, paper files, electronic document management images, etc.
Accessibility of data?	Underlying database is ODBC compliant so all data can be easily retrieved, analysed, etc.
Quality/completeness of ‘find’ data?	Analysis has proven the ‘find’ data quality is good and this supports robust decisions to be made re matching, including handling partial matches
Quality/completeness of ‘view’ data	Analysis has proven the ‘view’ data quality is good
ERI and Accrued values	ERI and accrued values are held for all members

Worst case scenario

Characteristic	Description
Number of systems?	Multiple administration systems in use – some legacy, some current
Data repository?	Some data is not digitally held – some data is ‘off system’ e.g. a mix of microfiche, paper files, electronic document management images, etc.
Accessibility of data?	Underlying databases area mix of mainframe and proprietary making accessing and analysing the data difficult and time-consuming using specialist resource. Data is not in a format to provide to dashboards (e.g. benefit statements output is not held on core systems but in print files)
Quality/completeness of ‘find’ data?	Analysis shows the ‘find’ data quality is poor, with a lot of missing and/or incomplete data elements. This makes the decisions around matching and partial matching difficult/complex
Quality/completeness of ‘view’ data	Analysis has proven the ‘view’ data quality is poor, with a lot of missing and/or incomplete data elements
ERI and Accrued values	ERI and accrued values are not held for all members and this results in a lot of ERI unavailable (Ref 2.308)/Accrued unavailable (Ref 2.407) data elements being displayed

Best case scenario

Stage – activity	Month 1	Month 2	Month 3	Month 4	Month 5
1 – Determine the starting point	█	█			
2 – Analyse 'find' data		█			
3 – Analyse 'view' data		█	█		
4 – Determine treatment of certain 'view' data elements		█	█		
Build 'find' functionality		█	█	█	
Build 'view' functionality				█	█
Test all functionality				█	█

Worst case scenario

Stage – activity	Month 1-2	Month 3-4	Month 5-6	Month 7-8	Month 9-10	Month 11-12	Month 13-14	Month 15-16	Month 17-18	Month 19-20	Month 21-22	Month 23-24
1 – Determine the starting point	█	█										
2 – Analyse 'find' data		█	█	█								
3 – Analyse 'view' data			█	█	█	█						
4 – Determine treatment of certain 'view' data elements				█	█	█	█					
Digitisation of records				█	█	█	█	█				
Data cleanse				█	█	█	█	█	█	█	█	█
System enhancement(s)				█	█	█	█	█	█	█		
Build 'find' functionality							█	█	█	█		
Build 'view' functionality								█	█	█	█	█
Test all functionality									█	█	█	█

Timeline:

Feedback from the research has suggested that schemes may be able to complete the stages for the 'core' of the scheme i.e. 80% of the membership in approximately 12 to 18 months. However the remainder may take much longer, with the tail of the membership being worked on for a number of years after an initial launch.

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