



Report of the Section 151 Officer

Pension Fund Committee – 13 July 2023

Pension Dashboard Preparedness Resourcing

Purpose:	To ensure the Pension Fund Administration Section is appropriately resourced to deliver Pension Dashboard Preparedness.
Consultation:	Legal, Finance and Access to Services.
Recommendation:	It is recommended that: 1) The resourcing identified in 4.1 be approved. 2) The Deputy S 151 Officer be delegated to recruit and appoint the same.
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Legal Officer:	S Williams
Access to Services Officer:	R Millar

1 Background

1.1 Following on from the announcement in March that there would be delays to the delivery of Pensions Dashboards, the Pensions Minister issued a written statement on the 8th June 2023. The key headline details from the statement included:

- Legislation will be updated to set an overall connection deadline for all schemes, which will be 31 October 2026.
- The individual connection deadlines for schemes will be set out in guidance, and will be before the final deadline of 31 October 2026. DWP is planning to collaborate with the industry this year before publishing this guidance.
- The date that Dashboards will go live to the public (Dashboards Available Point) has not been announced yet, but the Minister said that this could be earlier than 31 October 2026. This indicates that Public Sector Schemes will have an earlier staging date than 31 October 2026.

2 **Pensions Dashboard**

2.1 What are pensions dashboards?

Pensions dashboards are intended to provide a secure and single port of call for individuals to access all of their pension history in one place, including eventually their State Pension. The intention is to support better planning for retirement, and help individuals reconnect with any pension pots they may have lost over time.

2.2 How will pensions dashboards work?

Multiple dashboard providers are expected in the marketplace. Individuals will navigate to a dashboard of their choice and submit a request to view their pensions information. The dashboards will then issue electronic requests to all pension schemes to search for the individual's pension. Where a match is found, the scheme returns the location to the dashboard, allowing the individual to view their pension details online. Where partial matches are made, schemes will have a short timeframe to investigate and confirm whether it is an exact match, and then provide details as required.

2.3 What will pensions dashboards mean for administering authorities and scheme employers?

Broadly, administering authorities will have to meet registration requirements with the Money and Pensions Service (MAPS). This means ensuring connection to the dashboards ecosystem (expected to be all year round), the provision of scheme specific and individual pensions information as part of "find requests", and maintaining records on a range of management information for at least six years. All of this must be provided to MAPS, the Pensions Regulator and the FCA on request.

3 **Action required to get 'dashboards ready'**

3.1 Much of the technical infrastructure will be handled by our software provider Heywoods / Altair and processing of day-to-day "find requests" from individuals will be automated. This is being handled nationally by the national LGPS Pension Officers Technical group working alongside the software providers, Heywoods, Civica etc. There is, though, still plenty of preparation for LGPS administering authorities and their scheme employers. There are also likely to be day-to-day member enquires once dashboards are up and running. So, what should we be thinking about and when? It's all about data, data, data. Scheme member data is used for different purposes and the cleanliness of that data is measured in a multitude of ways. Historically this has focused on the existence of data (TPR common and scheme specific data scores), rather than the accuracy of that data. For dashboards we will have to conform to a new standard, which is currently being developed, but should focus on accuracy. So, while we might be broadly happy with the data held on our records, we need to be confident that the member data we hold is accurate and complete, particularly in relation to data items we expect to perform data matches against – i.e. surname, initials, NI number, date of birth.

3.2 Any issues or concerns could lead to increased enquiries once connected to the dashboards. We have recently undertaken a comprehensive data cleanse exercise as part of the Triennial Valuation 2022 exercise comparing core member data with our scheme employers' payroll for example, which

stands us in good stead, however this work needs to be continued until implementation of the Dashboard.

3.3 We shall need to consider introducing monthly employer returns in order to produce future projections for new joiners. Experience suggests we should not underestimate the effort required in getting this new regime in place. It's particularly important to clear any unprocessed leavers/backlogs ahead of connection to the dashboards' ecosystem. Otherwise, these will need to be processed on a case-by-case basis each time they correspond to a full match, following a "find request". There are also a number of other considerations that shouldn't be overlooked. These include engagement with our software provider to understand the changes they're required to make and the expected timescales. We must also agree our data matching criteria used to process "find requests" (e.g. surname, forename, NI number, date of birth), and consider what processes we need in place to deal with and process "find requests".

3.4 And finally, we need to ensure we are appropriately resourced to deal with pensions dashboard traffic. While not official research, PLSA enquiries indicate experience from similar dashboards across Europe suggest member engagement could be in the region of 25% to 33% of scheme members across all schemes. If replicated across the UK this would equate to every scheme receiving between 16,000 and 35,000 "find requests" a day. While not every request will impact our Fund, this does highlight the increased engagement we might expect to deal with. While there is much that still remains to be resolved, it is important to act now so that we are 'dashboards ready'. With so much else on the go, not least valuation implementation and McCloud remedy, it is important that we are resourced appropriately to cope with the traffic flow from members and employers.

4 **Resourcing Proposal**

4.1 In order to meet the preparedness and integration requirements demanded by the implementation of Pensions Dashboard for LGPS for the City & County of Swansea Pension Fund, it is recommended to appoint: -

1x Assistant Communications & Training Officer

Total costs (including on costs)

£34,093

With a remit to assist and input re. :

- Data cleanse programme with employers.
- Implement monthly data collection with employers.
- Data validation cycle.
- Develop Pension Dashboard Communications for employers.
- Communication and training with employers re. Dashboard Preparedness.
- Develop Training and operational protocols.
- Dashboard request for information resolution.
- Assist with the implementation of the dashboard go-live.

5 Financial Implications

- 5.1 The financial implications outlined in 4.1 can be supported via an appropriate charge to the pension fund.

6 Legal Implications

- 6.1 The proposals in 4.1 support the ability of the Administering Authority to comply with DWP/DHLUC Pension Dashboard Legislation.

7 Integrated Impact Assessment Implications

- 7.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage.
- Consider opportunities for people to use the Welsh language.
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to their own needs.

- 6.2 The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

- 6.3 Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

- 6.4 There are no equality impact implications arising from this report.

Background Papers: None.

Appendices: None.