

Pension schemes and those supporting them are busy preparing for pensions dashboards. The first schemes are set to connect from April 2025 and are getting their data, systems and processes ready to comply with their duties.

TPR meets regularly with schemes and third parties to understand how preparations are progressing. We see recurring areas of discussion come up in our engagement, and this article will address three of the main ones:

- Connecting in line with the Department for Work and Pensions' (DWP) connection guidance and what 'having regard to' this guidance means in practice.
- How dashboards duties apply to changes of administration and member transfers.
- TPR's approach to compliance and enforcement.

Connecting in line with the dates in guidance

Our engagement with industry suggests that most schemes plan to comply with their dashboards duties in line with their 'connect by' date as set out in the DWP's staged timetable.

Taking a staged approach to connection is important. It supports a controlled and well-planned onboarding and mitigates the risk of potential issues with resource. It also gives connected schemes a unique opportunity to test and adapt systems and processes they have in place within a live setting, before dashboards are made widely available to the public.

Not connecting in line with the guidance could expose schemes to the greater risk of not being able to comply with dashboards duties. This could happen, for example, if there is limited available resource in the industry or at the Pensions Dashboards Programme (PDP).

In exceptional circumstances, a scheme may be unable to follow the 'connect by' date set out in the DWP's guidance. Where this is the case, TPR expects schemes to develop a practical plan for connection with those supporting them (ie their third-party administrator or integrated service provider), with adequate governance and controls in place, and to then approach the PDP to agree a new connection date. More information on this process will be available from the PDP in due course.

Note that the connection deadline of **31 October 2026** must be met, subject only to any deferral specifically granted by the DWP. The deadline to apply for deferral was 8 August 2024.

TPR expects schemes to be able to demonstrate how they have had regard to the DWP's connection guidance. This includes documenting the reasons for related decisions, their assessment of the associated risks, and relevant mitigating actions.

How do dashboards duties apply to a change of administrator?

Once connected, a scheme must stay connected, in line with the PDP's standards. There is no additional 'black out' period and trustees remain required to meet their dashboards duties while the administrator change takes place.

Trustees and scheme managers must consider dashboards duties when onboarding a new administrator. They should maintain a robust audit trail, which includes the planning process and any risk management measures put in place for the change of administrator.

How do dashboards duties apply to a buy-in/buy-out?

Schemes only fall out of scope of the dashboards regulations when the number of relevant members falls to zero. This means that schemes in a buy-out process with 100 or more relevant members are in scope, unless all the members in the schemes are pensioners, or buy-out is completed for all relevant members. TPR views buy-out completion as when all relevant members of the occupational pension scheme become individual members of a private pension scheme or have their own insurance policy, and subject to the Financial Conduct Authority's (FCA) regulation.

In line with FCA rules providers will then have up to three months from the members' joining date to return administration information to dashboards. Value data will need to be returned once they first produce a statement of the members' benefits, or 12 months from the end of the first full scheme year they have been in the scheme (whichever is soonest).

Schemes in the process of buy-out may hope to complete the process ahead of the connection deadline. However, there is limited capacity in the market, so not all who want to will manage to do so. Unless a scheme is already working with a buy-out provider, it's risky to assume the transaction will be completed in time.

Where trustees were due to buy-out before the legislative connection deadline but don't manage to, they should report this breach to TPR using the breach of law process. TPR will consider factors including the length of the breach and harm to savers when deciding whether to take regulatory action in these circumstances. It's important that trustees or managers maintain a robust audit trail of any decisions and have appropriate governance processes in place.

TPR's approach to compliance and enforcement

TPR is committed to taking a pragmatic approach to compliance and is focused on saver outcomes. We will consider a range of factors before deciding whether to take regulatory action, including the nature and scale of the impact on members, and the numbers of members affected, in determining our course of action.

TPR recognises that some requirements on schemes and providers may be challenging for industry to meet. However, we expect them to take prompt and effective actions to investigate and correct any issues, including any underlying causes identified during the user testing stage.

TPR has published its Compliance and Enforcement Policy for dashboards, which details its approach and outlines a number of case scenarios that illustrate how this may work in practice. TPR's Breach of Law guidance has also been updated with specific dashboards examples to assist trustees and others with a reporting duty to decide whether to report a breach to us, based on its significance.

Key messages:

- Read TPR's guidance and download the checklist to help keep track of progress.
- Collaborate with those supporting you with your dashboards duties to develop a practical delivery plan which enables you to comply with your duties.
- Maintain a robust audit trail to keep track of key decisions made.

Useful links:

- **Dashboards guidance**
(www.tpr.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance)
- **Dashboards checklist**
(www.tpr.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/preparing-to-connect-checklist)
- **Compliance and enforcement policy**
(www.tpr.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/failing-to-comply-with-pensions-dashboards-duties)