From: TPR Pensions Dashboards < <a href="mailto:PensionsDashboards@tpr.gov.uk">PensionsDashboards@tpr.gov.uk</a>>

**Sent:** Thursday, July 20, 2023 2:15 PM

**Cc:** Bell, Angela < Angela.Bell@tpr.gov.uk >; Eldridge, Jo < Jo.Eldridge@tpr.gov.uk >; James, Emma

<Emma.James@tpr.gov.uk>

Subject: FW: Pensions dashboards, staging dates and 'with regard to' - what is the expectation on

schemes?

Dear all

Further to the email notification below, we have now updated TPR's pensions dashboards guidance pages (<u>Failing to comply with pensions dashboards duties</u> | <u>The Pensions Regulator</u>) to outline what schemes will need to do in order to demonstrate that they have had regard to the staging timeline that will be set out in connection guidance.

I've included a Q&A below that outlines the key messages for trustees and schemes managers at this time. Please do include these important messages in your communications to schemes, trustees and scheme managers.

# Q: What is the expectation on schemes in relation to 'have regard to the connection guidance'?

- All trustees and scheme managers must connect to dashboards by the connection deadline (31
  Oct 2026) set out in legislation. Failing to do so could result in regulatory action by The Pensions
  Regulator.
- A revised staging timeline will be set out in guidance, which will indicate when schemes are scheduled to connect. All trustees and scheme managers must also have regard to this guidance. Failure to do so will be a breach.
- Although the timeline in guidance will not be mandatory, trustees will be expected to demonstrate how they have had regard to the guidance. This means, but is not limited to, that:
  - o Trustees/scheme managers should not make decisions about connection until they have engaged with the guidance.
  - Trustees/scheme managers must be able to demonstrate that they have adequate governance and processes for making such decisions. The reasoning for the decisions should be clearly considered and documented; as well as how relevant risks are identified, evaluated and managed.
  - o Trustees/scheme managers should make sure that they have access to all the relevant information before making decisions and acting on them, which includes engaging with those who are supporting them to develop a practical delivery plan. Clear and accurate audit trails need to be kept to demonstrate the decisions made, the reasons for them and the actions taken.
- A phased approach to staging enables a controlled and well-planned connection, reduces the
  risk of capacity constraints in their providers, and means savers can realise the benefits of
  Pensions Dashboards as early as possible.
- We strongly advise trustees/scheme managers to continue preparing for dashboards, in particular by engaging with those that support them with their dashboard duties, such as Administrators and ISP providers:
  - o to assess the potential impact of these changes on their schemes,
  - o to agree a practical delivery plan and
  - o to continue activity on getting to grips with members' data.

Please do let me know if you have any questions about the above.

Kind regards Alex

#### **Alex Smith**

Industry Engagement
Regulatory Policy, Analysis and Advice

#### www.tpr.gov.uk

Start preparing for Pensions dashboards now

**Sent:** 08 June 2023 12:30

**Subject:** Important update: Pensions dashboards amended regulations

Importance: High

Dear all

DWP has today laid Pensions Dashboards (Amendment) Regulations 2023. A link to a summary of the regulations can be found <a href="https://example.com/here">here</a>. A link to the full amended regulations can be found on our <a href="https://example.com/here">here</a>. In touch with developments' page.

- The amended regulations include a connection deadline of 31 October 2026, with anticipation that a staging timeline will be set out in guidance (to which trustees and scheme managers must have regard).
- TPR welcomes the new roadmap for the launch of dashboards. We will continue to provide education to support trustees to meet their duties and will write to all schemes to confirm their staging date once the guidance has been published.
- It is now up to industry to work constructively with PDP to ensure a phased and wellplanned approach to connection is maintained, and that savers can realise the benefits of Pensions Dashboards as early as possible.

We understand that you will receive queries from schemes in relation to what this means for them, and we want to provide reassurance that pensions dashboards have cross-party support and DWP, PDP, TPR and FCA remain committed to their delivery. We will continue to work with industry to make dashboards happen – we know that industry is equally passionate about dashboards.

### What TPR expects

- We urge industry to work with their providers and MaPS to deliver the staged connection timeline set out in the guidance published by DWP and MaPS. This is important a phased approach to staging enables:
  - o a controlled and well planned connection,
  - reduces the risk of capacity constraints particularly for those supporting schemes with their duties and ultimately,
  - means savers can realise the benefits of Pensions Dashboards as early as possible

- We expect trustees and scheme managers to continue preparing for dashboards, in particular by engaging with the parties who will support them with their dashboard duties, such as Administrators and ISP providers:
  - to assess the potential impact of these changes on their schemes and to agree a practical delivery plan
  - o to continue activity on getting to grips with members' data, and
  - o to avoid competing demands on capacity and other resources.

## What to expect from TPR

- We have updated our guidance to reflect the changes on the connection deadline. We consulted on our draft C&E policy in November 2022. We are assessing what, if any, changes need to be made as a result of the change to regulations and will provide an update in due course
- We will share a content toolkit with you shortly with a guest blog, suggested content for newsletters, and new creatives, that we are asking that you use within your client/practitioner communications to help to maintain consistent messaging.
- We recognise the importance of supporting schemes through this process. We will write to all schemes to confirm their staging date once the guidance has been published.

We will of course continue to engage directly with you through our existing meetings to ensure that we continue to update each other on activity and concerns - **our next meeting is tomorrow (9<sup>th</sup>)**, unfortunately, I will not be able to attend but Angela Bell will be attending.

Should you have any questions about the above, please do let me know.

Kind regards

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