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Pensions Dashboards

Guidance on connection: the staged timetable

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1. Background

1.1 About pensions dashboards

Pensions dashboards will allow individuals to see their pensions information, including their State Pension, for free in one place online at a time of their choosing. Pensions dashboards will also reunite savers with lost or forgotten pensions. The ability to access information easily alongside an increase in individuals' awareness and understanding of their pension information could also support people with better planning for their retirement.

2. Purpose of this guidance

2.1 Relevant legislation and rules

Paragraph 3 of Schedule 9 to the Pension Schemes Act 2021 inserted Articles 215D, 215E and 215G of the Pensions (Northern Ireland) Order 2005 to legislate for the connection of occupational pension schemes to the pensions dashboards ecosystem. Sections 137FAA-137FAC of the Financial Services and Markets Act 2000 as inserted by section 121 of the Pension Schemes Act 2021 placed obligations on the Financial Conduct Authority (FCA) to make corresponding general rules imposing requirements on providers of personal and stakeholder pension schemes.

The Pensions Dashboards (No. 2) Regulations (Northern Ireland) 2023 (“the Regulations”) require occupational pension schemes to connect to the pensions dashboards ecosystem and respond to requests for pensions information. In November 2022, the FCA introduced corresponding requirements for providers of personal and stakeholder pension schemes (COBS 19.11 of the FCA Handbook).

The Regulations introduced a single “connection deadline” of 31 October 2026 for relevant occupational pension schemes to connect to the pensions dashboards ecosystem. The FCA made a corresponding amendment to its Handbook rules.

2.2 About this guidance

All schemes in scope of the Regulations are legally required to be connected to the pensions dashboards ecosystem and be ready to respond to requests for pensions information by 31 October 2026 at the latest.

This guidance sets out a staged timetable for occupational pension schemes to be connected to the pensions dashboards ecosystem and be in a position to process ‘Find’ and ‘View’ requests.

Guidance issued by the Pensions Dashboards Programme (PDP) will provide further detail on the process of connecting to the pensions dashboards ecosystem including, but not limited to, when to contact the PDP and the onboarding process. This guidance should also be read in conjunction with the PDP standards, including the Code of Connection. PDP will produce connection and testing materials to support the pensions industry in their connection journeys. Furthermore, The Pensions

Regulator (TPR) has issued guidance to support schemes with connecting and supplying data to the pensions dashboards ecosystem. Their guidance includes a checklist¹ which schemes can use in preparing to meet the requirements for connecting to the pensions dashboards ecosystem.

There has been extensive engagement with the PDP, the FCA, and TPR on the principles underpinning a staged approach to connection. The connection timetable in this guidance prioritises schemes with the greatest number of memberships. This approach aims to ensure a sufficiently high level of pensions memberships will be available to 'Find' and 'View' on pensions dashboards as early as possible, in turn enabling the launch of pensions dashboards for use by the public at the earliest possible point.

Retaining the broad framework of a phased approach to connection will be important in managing the flow of connections to the pensions dashboards ecosystem. Working with industry, PDP expects to facilitate connection in line with the "connect by" dates in guidance, ahead of the connection deadline in legislation. Trustees or managers connecting too close to the connection deadline of 31 October 2026 could place undue strain on all parties involved in facilitating connection, including PDP, administrators, and Integrated Service Providers. Where trustees or managers connect later than their "connect by" date in guidance, they do so at greater risk of not being connected by the connection deadline in legislation.

Whilst the timetable is not mandatory, given that it is being published to ease the connection journey, trustees or managers are encouraged to follow the dates in this guidance unless there are exceptional circumstances which prevent them from doing so.

2.3 Who is this guidance for?

This guidance is applicable to trustees or managers of relevant occupational pension schemes², including trustees of occupational pension schemes which voluntarily bring themselves into scope of the Regulations (as set out in regulation 16). For the

¹ <https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/preparing-to-connect-checklist>

² Schemes with 100 or more members (which are not pensioner members) on the reference date or any subsequent date thereafter

remainder of the guidance the term 'trustees or managers' will be used to refer to trustees or scheme managers of relevant occupational pension schemes.

Parties that intend to support schemes with their connection to the pensions dashboards ecosystem (such as advisers, administrators, and Integrated Service Providers) may also benefit from familiarising themselves with the guidance. Potential providers of Qualifying Pensions Dashboard Services (QPDS) may also find this guidance of interest.

This guidance is applicable to occupational pension schemes in scope of the Regulations. Guidance for pension scheme providers subject to FCA Rules is available at Gov.uk³.

2.4 The legal status of this guidance

Trustees or managers must have regard to the guidance in order to comply with the requirement in regulation 15(2)(c) of the Regulations. Not having regard to the guidance would be a breach of these requirements. This means that trustees or managers must take the guidance into account when preparing to connect to the pensions dashboards ecosystem.

2.5 Regard to the guidance

The Regulations specify that trustees or managers must have regard to guidance on connection issued from time to time by the Department, the Money and Pensions Service and The Pensions Regulator, either separately or by at least two of them jointly.

It is a legal requirement for trustees or managers to have regard to this guidance as part of meeting their obligations and not doing so would be a breach of this requirement. As such, trustees or managers must consider it when making decisions or taking actions in relation to preparing to connect to dashboards.

Trustees or managers will need to be able to demonstrate, upon request, how they have had regard to this guidance. This means, but is not limited to:

³ <https://www.gov.uk/government/publications/pensions-dashboards-guidance-on-connection-the-staged-timetable>

- Not making final decisions about connecting before engaging with this guidance.
- Being able to demonstrate that adequate governance and processes for making such decisions are in place. The reasoning for decisions should be clearly considered and documented, as well as how relevant risks are identified, evaluated and managed.
- Making sure that access is available to all relevant information before making decisions and acting upon them. Keep clear and accurate audit trails to demonstrate the decisions made, the reasons for them and the actions taken.

If trustees or managers are unable to demonstrate how they have had regard to the guidance, this may result in enforcement action by The Pensions Regulator.

2.6 The connection journey

There will be two ways that trustees or managers may opt to connect to the pensions dashboards ecosystem –

- using an in-house technical solution by building their own direct connection; or
- buying the services of an Integrated Service Provider (ISP) or third party administrator and connecting through them.

The Pensions Dashboards Programme (PDP) expects to facilitate connection in two stages. The first stage involves connection of any schemes which will build a direct connection to the pensions dashboards ecosystem. The PDP expects to begin this first stage ahead of widescale connection commencing as per the staged timetable.

Building an interface that will connect directly to the pensions dashboards ecosystem is a significant undertaking which will require specialist technical expertise to build and maintain systems that can meet the PDP standards and deal with high volumes of 'Find' and 'View' requests. Extensive testing will be required to evidence meeting the standards, including an independent third-party security test. This will take time and therefore trustees or managers intending to build a direct connection should engage with PDP as soon as possible, if they have not already done so.

The second stage will involve connection of schemes which will use a third-party organisation to facilitate connection. The “connect by” dates which are set out in this guidance are premised on the expectation that trustees or managers which have not already approached PDP to build a direct connection will be doing so using the services of a third-party organisation which has already completed its own direct connection to the pensions dashboards ecosystem. It is recommended that trustees or managers intending to connect via a third party should engage with the relevant organisation well in advance of their “connect by” date.

Commencing connection testing with the PDP in a timely manner will increase the likelihood of trustees or managers being in a position to process ‘Find’ and ‘View’ requests by their assigned date. Once connected, all requirements apply - including the requirement to remain connected. Importantly, and irrespective of whether they are connecting directly or via a third-party organisation, all trustees or managers should be ready at the time of connection to receive ‘Find’ requests, undertake matching, and return ‘View’ data, pursuant to the requirements in the Regulations.

3. The staged timetable for connection

To note: “number of relevant members at reference date” should be calculated as:

- for trustees or managers of occupational pension schemes subject to the Regulations: number of relevant members per scheme (active members, deferred members, and pension credit members) at the scheme year end date in the period between 1 April 2023 and 31 March 2024

PART 1: LARGE SCHEMES

Cohort	Scheme type	Number of relevant members at reference date	Connect by
1(a)	master trust schemes that provide money purchase benefits only	20,000 or more	30 April 2025
1(b)	money purchase schemes used for automatic enrolment	5,000 or more	31 May 2025
	master trust schemes that provide money purchase benefits only	5,000-19,999	
	any remaining money purchase schemes	20,000 or more	
	schemes without money purchase benefits, other than public service pension schemes or parliamentary pension schemes	20,000 or more	
	hybrid schemes	20,000 or more	
1(c)	master trust schemes that provide money purchase benefits only	1,000-4,999	30 June 2025
	money purchase schemes used for automatic enrolment	1,000-4,999	
	any remaining money purchase schemes	5,000-19,999	

Cohort	Scheme type	Number of relevant members at reference date	Connect by
	schemes without money purchase benefits, other than public service pension schemes or parliamentary pension schemes	5,000-19,999	
	hybrid schemes	5,000-19,999	
1(d)	any remaining money purchase schemes	2,500-4,999	31 August 2025
	schemes without money purchase benefits, other than public service pension schemes or parliamentary pension schemes	2,500-4,999	
	hybrid schemes	2,500-4,999	
1(e)	schemes that provide collective money purchase benefits, whether alone or in conjunction with other benefits	all sizes	30 September 2025
	any remaining money purchase schemes	1,500-2,499	
	schemes without money purchase benefits, other than public service pension schemes or parliamentary pension schemes	1,500-2,499	
	hybrid schemes	1,500-2,499	
1(f)	public service pension schemes	all sizes	31 October 2025
	parliamentary pension schemes	all sizes	
1(g)	schemes without money purchase benefits	1,000-1,499	30 November 2025
	any remaining hybrid schemes	1,000-1,499	
	any remaining money purchase schemes	1,000-1,499	

PART 2: MEDIUM SCHEMES

Cohort	Scheme type	Number of relevant members at reference date	'Connect by' date
2(a)	relevant occupational pension schemes	750 – 999	31 January 2026
2(b)	relevant occupational pension schemes	600 – 749	28 February 2026
2(c)	relevant occupational pension schemes	400 – 599	31 March 2026
2(d)	relevant occupational pension schemes	320 – 399	30 April 2026
2(e)	relevant occupational pension schemes	250 – 319	31 May 2026
2(f)	relevant occupational pension schemes	195 – 249	30 June 2026
2(g)	relevant occupational pension schemes	155 – 194	31 July 2026
2(h)	relevant occupational pension schemes	125 – 154	31 August 2026
2(i)	relevant occupational pension schemes	100 – 124	30 September 2026
CONNECTION DEADLINE: 31 OCTOBER 2026			

4. Additional information

4.1 Schemes brought voluntarily into scope of the Regulations

It is recognised that there may be some trustees or managers of occupational pension schemes that have fewer than 100 relevant members at the reference date which wish to voluntarily connect to the pensions dashboards ecosystem and bring their scheme into scope of the Regulations. Any trustees or managers that wish to do so should refer to forthcoming guidance published by the PDP.

4.2 New schemes

If an occupational pension scheme does not exist at the reference date but comes into existence on or after 1 April 2024 (and meets the threshold for connecting to the pensions dashboards ecosystem after the reference date), trustees or managers should connect their scheme by either six months from the end of their first scheme year, or the assigned date that applies to schemes of similar size and type as set out in the guidance, whichever is later. They must also have regard to the guidance.

4.3 Changes of administrator – applications to defer connection

It is recognised that changing administrator can be a significant process, which in some circumstances may require the transfer of data relating to extremely large numbers of memberships. In these circumstances, it may be excessively burdensome to connect to the pensions dashboards ecosystem by the dates set out in this guidance. Provided that connection is completed before 31 October 2026, it is not a requirement in the Regulations to make a formal application to defer connection if trustees or managers do not believe it is possible to connect by the dates set out in this guidance because of a change of administrator. It is recommended, however, that trustees or managers should communicate their plans with the PDP and TPR at the earliest opportunity.

The Department has issued guidance for trustees or managers of occupational pension schemes that meet the criteria set out in regulation 17 of the Regulations that may wish to apply to defer the connection deadline of 31 October 2026⁴.

⁴ <https://www.communities-ni.gov.uk/publications/pensions-dashboards-guidance-deferred-connection>

In having regard to the timetable set out in section 3 of this guidance, trustees or managers which are changing administrator are encouraged to review the guidance on deferred connection, even if they are not required to make a formal deferral application under regulation 17. Whilst this is not a requirement under the Regulations, the deferred connection guidance sets out useful information that trustees or managers may wish to consider. In particular, whether changing administrator creates a disproportionate burden, or whether there may be alternative ways of connecting in line with the timetable in section 3 of this guidance.

4.4 Other considerations

Whilst it is not mandatory, adhering to the dates in the staged timetable for connection would provide the Pensions Dashboards Programme with adequate time to assist and co-ordinate activities to support the connection of schemes in advance of 31 October 2026 and successfully deliver pensions dashboards. Connecting by the dates set out in this guidance also has additional benefits to schemes which include:

- being placed in a good position to achieve compliance by agreeing a practical delivery plan with their suppliers;
- sufficient testing time to enhance their members' experience of using pensions dashboards; and
- demonstrating good governance and robust risk management.

The staged timetable for connection provides a 'connect by' date each month for different cohorts, but the connection of an entire cohort will require the connection of multiple entities. It will therefore be necessary to cooperate with PDP (in line with the general cooperation requirement set out in regulation 14 of the Regulations) to agree the precise timing of that connection within that month. In practice, this may be via an ISP or third-party administrator through which the scheme is connecting.

In the event that trustees or managers have missed the relevant 'connect by' date (as set out in this guidance), it will also be necessary to cooperate with the PDP to find a new connection date. Missing the connection deadline of 31 October 2026 may result in enforcement action by The Pensions Regulator.

For trustees or managers using a third-party organisation (such as an administrator or ISP) to facilitate connection, it is important to agree with the third party what is required and ensure this is completed well before the relevant 'connect by' date set out in this guidance.