

Trustees of schemes in scope should now have established their dashboards “connect by” date and have realistic project plans in place. This guide focuses on some practical points that trustees should not overlook.

Trustees who have not yet identified their “connect by” date can establish this by accessing The Pensions Regulator’s (TPR) [online tool](#). TPR’s [dashboards connection checklist](#) can be used as the basis for the scheme’s project plan.



Take Thyme To Get Your Planning Right

TPR expects pensions dashboards to be a standing item on every trustee meeting agenda. If actions have been delegated to a working group or trustee subcommittee, ensure that progress is reported at trustee meetings.

Action – Make sure that dashboards are on every trustee agenda and leave time to discuss progress in meetings. Check that subcommittee terms of reference are up to date.

It is vital that trustees maintain an audit trail of all their efforts to comply with dashboards connection. If something goes wrong, a good audit trail could prevent TPR taking action for noncompliance. Trustees are required to “have regard to” the Department for Work and Pensions (DWP) [connections guidance](#) and they need to evidence how they have done so.

Action – Ensure that records of compliance efforts made to date are accessible, and maintain a good audit trail going forward. Consider keeping a dashboards decisions log.

Most schemes will connect to the dashboards ecosystem via an administrator or integrated service provider that will connect a large number of schemes with different “connect by” dates.

Action – Confirm connection plans with your third-party administrator or integrated service provider. It is important to maintain an open dialogue to ensure that plans remain on track.



Does Your Administration Cut the Mustard?

Scheme administration resources may be stretched due to dashboards preparatory work and also due to the anticipated increase in member questions once dashboards are available to the public.

Action – Talk to your administrator about their plans to resource the additional work and keep an eye on service standards. Our [quick guide](#) offers advice if service standards fall.

Trustees should have timely discussions with their additional voluntary contribution (AVC) providers. There are a number of options for presenting AVCs on dashboards. The provider is likely to have a preferred approach, but trustees need to be comfortable with this.

Action – Speak to AVC providers and assess options for presenting AVC information.

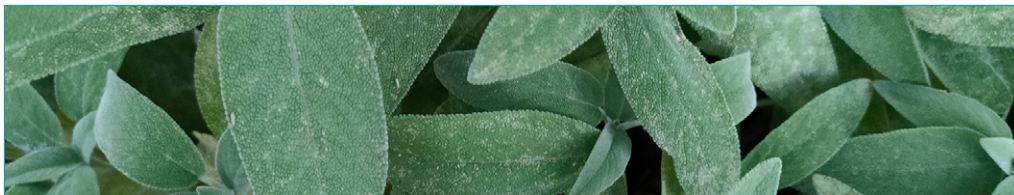
If a scheme is embarking on a programme to change administrator, there are two options open to trustees if it is likely to become disproportionately burdensome to comply with:

- The overall dashboards connection deadline of 31 October 2026.

Action – Trustees can make a [deferral application](#) to the DWP before 9 August 2024. The circumstances under which deferral can be granted are extremely narrow and evidence must be supplied.

- The scheme’s connect by date in the DWP connections guidance.

Action – Trustees should report this to the Pensions Dashboards Programme (PDP) and TPR and inform them of their plans, having considered the DWP guidance carefully.



Seek Sage Legal Advice

Pensions dashboards are a new workstream, and contractual terms should be agreed with the administrator or integrated service provider. It is important that trustees understand the contractual terms and take legal advice, even if agreements are presented to them as standard (or nonnegotiable). We recommend that trustees ask about contractual terms at an early stage as this puts them in a better position to question or negotiate any unfavourable terms.

Action – Trustees should always seek legal advice before signing contracts.

A data protection impact assessment (DPIA) should be carried out before connecting to the dashboards ecosystem. (Our [DPIA Life Hack](#) contains more information.) As part of their assessment, trustees should test that the data matching criteria are set appropriately for their scheme. If they are not, trustees risk returning pensions information to the wrong person, or not matching a high level of member records. Trustees may be guided by administrators, but they should be comfortable that the matching criteria have been fully interrogated at a scheme level and that the best outcome has been achieved.

Action – Trustees should seek legal advice if they have any concerns about data protection, including data matching criteria.

Even with impeccable planning, there are many things that could go wrong along the dashboards connection journey.

Action – Trustees should seek legal advice promptly if they encounter problems that put them at risk of not complying with the connect by date in DWP guidance, or the overall deadline of 31 October 2026.



Dashboards Information Is Peppered Across Many Sources

See our [dashboards resource hub](#) for links to key dashboards information.

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