



Department for Work and Pensions
Sent by email to: pensionsdashboard@dwp.gov.uk

19 July 2022

Pensions dashboards: further consultation

Thank you for the further consultation on Pensions dashboards.

I respond on behalf of the Local Government Association (LGA). The LGA is a politically led, cross-party membership organisation which represents more than 330 councils of all types and 44 fire authorities across England. We work on behalf of our members to support, promote, and improve local government.

The response has been drafted by the Pensions Team at the LGA with particular reference to the Firefighters' Pension Scheme (FPS). The team provides employer and administrator support to various public service pension schemes, including the Local Government Pension Scheme (LGPS), the Teachers' Pension Scheme (TPS), as well as the FPS.

The FPS had approximately 32,985 active members across three schemes at the last valuation date (31 March 2016); at the same date there were 10,675 deferred members.

Under the FPS regulations, each of the 44 Fire and Rescue Authorities (FRAs) are responsible for the management and administration of their scheme and are defined in law as the scheme manager. This puts the responsibility to comply with overriding pension legislation on each of the political bodies charged with governance of the Fire and Rescue Service (FRS), i.e. Combined Fire Authorities, PFCCs, County Councils, Mayoral functions etc.

Each FRA is required to administer the pension scheme either in-house or through appointing a third-party administrator. There are currently 14 different pension administrators. They are mostly not for profit organisations, with one known exception, and are often linked to LGPS administering authorities.

We are pleased to provide our responses to the consultation questions below. If you have any questions, please do not hesitate to contact me.

Yours faithfully

Joanne Donnelly

Joanne Donnelly
Head of Pensions

Question 1: Do you agree that 90 days is a reasonable period between the DAP formally being announced, and the DAP itself?

We note that the provision outlined at [Annex A](#) suggests the period would be “at least” 90 days. We believe the reasonableness of this will depend on whether schemes and providers are given a sufficient amount of advance notice of the expected date of the DAP. We would seek assurance from DWP that clarification of an approximate timescale would be provided as soon as possible in advance of the formal Secretary of State notice being issued, on a “no surprises” basis as indicated in the consultation document, and that this would follow detailed engagement with MaPS, TPR, and the FCA. A period of 12 months would seem sufficient.

We understand and support that dashboards will be made publicly available to all consumers on day one, to tie in with the staging objective that dashboards will only be made available once sufficient coverage has been achieved across the landscape. We believe that this should be the case in order to provide a credible and consistent experience for individuals wishing to access information via a qualifying pensions dashboard service.

We would anticipate that a high level of testing will have taken place before this point to ensure that schemes have adequate matching principles in place and a process to resolve partial matches (whether manual or automated) and can return data within the expected timescales. We would also expect schemes to have undertaken a data review and put improvement plans in place, in line with TPR guidance, in order to maximise the number of matches made. We are aware that a substantial number of resources have been issued on dashboard data requirements by industry bodies such as PASA.

Additionally, if advance notice is given of the expected DAP, this will allow schemes and administrators to have plans in place to deal with an increase in queries.

We are aware that across the pensions landscape, there is difficulty in recruiting and retaining skilled and experienced pensions professionals, and this could be a cause for concern in terms of additional resource demand.

For example, we note from TPR’s [recent survey of pension scheme administrators](#) that:

- Two thirds (66 per cent) of respondents identified volume of legislative change as a barrier to providing a high-quality service; 37 per cent stated recruitment and retention of staff (figure 3.1.3).
- Two thirds (66 per cent) said that recruiting skilled and experienced staff was a challenge (table 3.1.10).

However, where schemes and administrators are struggling to meet a surge in demand, we welcome the clarification that TPR will have discretion to apply a pragmatic and proportionate approach to compliance and enforcement as referenced a number of times in the main consultation response, and “will take individual circumstances into account” [para 3.38]. We welcome sight of TPR’s consultation on its compliance and enforcement policy, although it is disappointing to note that it will not be published until after the Pensions Dashboards regulations have been laid.

Question 2: Do you have any comments on the proposed powers to disclose information?

We support the proposed powers on the grounds that the information will be disclosed to ensure that pensions dashboards are operationally effective, and all parties are compliant with their statutory requirements.

We understand that scheme member data will not be shared and that the powers do not override existing Data Protection legislation. We note that MaPS and TPR already have disclosure provisions in place, and this represents an extension of similar powers with other bodies such as the FCA.

We welcome the transparency of these additional powers being clarified in legislation and given the high level of public and industry scrutiny that will be applied to the project, we anticipate that a correspondingly high level of governance will be in place.