



Dashboards Working Group

AVC provider connecting scheme AVCs to dashboards – trustee questionnaire

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PASA 

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itm
Solution delivered...

PASA Experts for Dashboards

AVC provider connecting scheme AVCs to dashboards – trustee questionnaire

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Acknowledgments

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1 Introduction

Trustees are expected to meet their pensions dashboards duties for all parts of the scheme including AVCs. Trustees will need their providers to support them in connecting their AVCs to the pensions dashboard ecosystem and ensuring they're compliant.

There are two methods of achieving this:

1. The 'Single Source' approach, where a single party will connect both main scheme benefits and AVCs. The main scheme administrator would usually lead on this
2. The 'Multiple Source' approach, where the AVC provider connects the scheme's AVCs directly to the pensions dashboards ecosystem, separately to the main scheme benefits

Some AVC providers may only offer one option (i.e. Single **or** Multiple Source) and schemes with multiple providers may need to ensure they can implement both options.

For the chosen option for each AVC policy, trustees will need to understand and document how AVCs will be connected. They need to be satisfied the solution meets all the dashboards regulation requirements, all necessary contractual provisions are in place with the AVC provider and ultimately the solution will deliver a good end-to-end saver experience for their scheme members.

The questionnaire below can be used by trustees to gather information from their AVC providers, enable them to identify any risks and put in place mitigations as well as improvements to ensure they're able to meet their dashboards duties in this area.

Trustees and administrators may also wish to consult the [Pension Regulator's \(TPR's\) compliance and enforcement policy](#) and their separate [guidance on whether to report a breach of the law](#), both of which are relevant to AVCs and include some examples.

2 Questionnaire for AVC providers completion

Name of Scheme:

Scheme connection deadline:

Trustees' target connection date:

(This is the date the AVC provider should work to)

Benefit Illustration Date to be used for main scheme benefits:

Benefit Illustration Date used on current benefit statements

Name of AVC Provider:

Date completed:

Completed by:

Contact details:

Area or data item for consideration	AVC provider connects directly Trustee question:	Provider response
Governance and compliance		
Reporting	Please confirm reporting will be in place as required in the standards. The trustees request receipt of the same information as provided to the ecosystem in order to demonstrate good governance and oversight of compliant service.	
Method of connection	Please provide details of how you're proposing to connect directly. e.g. are you using an ISP? If so, which one, is the contract in place etc?	
Timing of connection of scheme AVC policies	Are you able to first connect the AVC policies for the scheme at the date chosen by the scheme (given suitable notice)? Please see above for the trustees target connection date.	

Area or data item for consideration	AVC provider connects directly	Response
Reconciliation with the scheme administrator's Records of members with AVC policies	<p>Please confirm:</p> <ul style="list-style-type: none"> • How you intend to reconcile the qualifying members with the main scheme administrator to ensure only appropriate records are provided to be matched against • If the trustees wish to carry out the reconciliation exercise, will you support it by providing the necessary extract of data? 	
Cyber Security	<p>TPR has recommended trustees review their Data Protection Impact Assessments in the light of dashboards. The trustees will be seeking cyber security information from all their providers connecting to the ecosystem on their behalf. Please advise if you're preparing a standard pack of InfoSec information or require the trustees to detail the information needed.</p>	
Contract changes	<p>As you're providing a new service to the trustees which includes compliance requirements, this will necessitate some form of contract. Please advise if you're proposing to issue a template Agreement or Letter of Variation and when this will be available for review by our legal advisers.</p>	

Area or data item for consideration	AVC provider connects directly	Response
Matching		
Match Criteria	<p>Please confirm:</p> <ul style="list-style-type: none"> Your proposed ‘matching’ and ‘possible matching’ protocols Whether alternative matching protocols can be selected by the scheme, and if so whether a cost will be incurred 	
Quality of matching data	<ul style="list-style-type: none"> Has the quality of the proposed matching data been reviewed? If so, please confirm when this took place and any modelling of how effective your matching approach would be given the quality of the data you hold? e.g. how many members would be a ‘match made’, ‘possible match’ or ‘no match’, and whether any data cleanse requirements have been identified as a result If the matching data quality hasn’t been reviewed, what services are you intending to provide to review data and check accuracy, and model how well matching will perform for the scheme members? What are your plans for keeping matching data up to date? What are your plans for notifying the main scheme administrator of any changes to personal data? <i>Note for user of this document: this may already be a requirement with an associated BAU process in place, depending on the contract with the AVC provider, in which case we suggest you adapt this question.</i> 	

Area or data item for consideration	AVC provider connects directly	Response
Possible Matches	<p>Please confirm:</p> <p>How you will deal with member enquiries after a possible match response has been provided. Please note possible match enquiries won't be handled by the scheme administrator as they won't have access to the data used by the AVC provider for matching or any associated information:</p> <ul style="list-style-type: none"> • Will a helpline be available? • Will a digital resolution service be available? • Does the personal data held for members support the authentication needed for each of the options or is data cleanse a dependency? • Where a possible match enquiry turns into a positive match made, how will you ensure the next dashboard request results in a positive match? • Will you be reviewing possible match rates and causes, reporting back to the scheme? 	
Other data considerations		
Pension Reference	Please provide details of the reference number you will use to identify members.	
Pension Name	Please provide details of the name of the arrangement you will use. It's important members can identify the information you're providing to the dashboard relate to their AVCs to our scheme.	
Pension Type	Please confirm you will be populating the pension type as AVC for our members.	
Pension Origin	Please confirm how you will ensure the correct pension origin will be returned to the dashboard for our members. How will you identify if, for example, any members should have an origin of WC or WT?	

Area or data item for consideration	AVC provider connects directly	Response
Pension Status	Please confirm how you will ensure the dashboard shows the correct status. e.g. will you assume anyone who has ceased contributions over a given period is inactive. Please advise your process for dealing with new entrants.	
Pension Start Date	Please confirm the date you will use for pensions start date. Will this be the date of the first contribution or an alternative date?	
Pension Retirement dDte	Please confirm the date you will use for pension retirement date. Where there is an option for members to select a Target Retirement Date (TRD), is there a hierarchy? e.g. if the member has a TRD this is used and, if not, this field defaults to Normal Retirement date (NRD)?	
Pension Link	We would like to implement the pensions link for our members. Please confirm if you can do this. The Globally Unique Identifier (GUID) will be supplied by our scheme administrator.	
Date of Birth	Please confirm date of birth is populated for all our relevant members.	
Employer Name	As this is optional data, please confirm your plans in relation to employer data.	
Employment Start Date	As this is optional data, please confirm your plans in relation to employer data.	
Employment End Date	As this is optional data, please confirm your plans in relation to employer data.	

Area or data item for consideration	AVC provider connects directly	Response
Values and related data – please provide this information for both Estimated Retirement Income (ERI) and Accrued Value (AV) highlighting where this might be different		
Benefit Type	Please can you confirm the ERI benefit type you will use for our members. We're assuming this will always be AVC but please advise if there are any circumstances where this won't be the case.	
Amount Type	Please confirm the income type you will use.	
Basis	Please confirm the calculation basis you will use. We're assuming this will be SMPI but please advise if you anticipate there being any exceptions to this.	
Illustration Date	<p>The illustration date for the AVCs must be the same as used by the main scheme.</p> <ul style="list-style-type: none"> • Please confirm the illustration date you currently use for production of annual statements • If your statement illustration date differs from the scheme's required illustration date (as noted on the top of this form) then detail your plans and timescales to provide data to dashboards at the scheme's required illustration date • Please confirm you can put a process in place for uprating the data used for responding to dashboards. e.g. view requests on an annual basis, with the timing of the uprating co-ordinated with the trustees' administrator. This will ensure the trustees can meet their duty under the regulations which specifies all scheme benefits for a member should be returned with the same illustration date. 	
Payable Date	Please confirm the date you will use as the ERI payable date. As above, will there be a hierarchy of dates?	

Area or data item for consideration	AVC provider connects directly	Response
Amount	Please confirm this will be in line with V5.1 of Technical Memorandum 1 (TM1).	
Monthly Amount	Please confirm this will be in line with V5.1 of TMI.	
End Date	We're assuming this isn't relevant, but please advise if there are any circumstances in which you would expect this data to be populated.	
Increase	We're assuming this will always be the case, but please advise if you're aware of any circumstances where this wouldn't.	
Survivor Benefit	We're assuming this will always be the case, but please advise if you're aware of any circumstances where this wouldn't.	
Pot	Please confirm this will be in line with V5.1 of TMI.	
Safeguarded Benefits	We're assuming this will always be the case, but please advise if you're aware of any circumstances where this wouldn't.	
Warning	Please advise which of the warnings you will use and how you anticipate sourcing the data necessary to ensure the right members see the correct warning on the pensions dashboard.	
Unavailable	<p>Please list the value data unavailable codes you will use and for which members. This should include the use of codes in temporary scenarios, e.g. if there are temporary issues with a member's transaction record which prevent a calculation for some reason and for more 'permanent' scenarios.</p> <p>Will you still provide Accrued Value information for members who have passed their benefits payable date even though an ERI figure isn't appropriate? Please confirm whether you will provide value information for all members including those with small pots.</p> <p>If you're planning to use the DCC code, please provide details of your process to ensure you meet the 3-day compliance requirements for this data to be available to the member.</p>	

Area or data item for consideration	AVC provider connects directly	Response
Member support		
Admin contact preferences and resourcing plans	Please confirm your organisation's contact preference for possible matches and member queries. What are your plans for resourcing post the Dashboards Available Point (DAP) to deal with a likely increase in member queries?	
Administrator URL	What URL will you include? Will this be a URL used by your organisation or are you planning to include the scheme's URL. If you're planning to use the scheme's URL we may need to add some wording to our website to direct scheme members to your organisation if they have queries about their AVC information.	
Administrator Email	Please confirm the information you're proposing to make available to scheme members.	
Administrator Phone Number	Please confirm the information you're proposing to make available to scheme members.	
Administrator Phone Number type	Please confirm the information you're proposing to make available to scheme members.	
Administrator Postal Name	Please confirm the information you're proposing to make available to scheme members.	
Administrator Address Line 1	Please confirm the information you're proposing to make available to scheme members.	
Administrator Address Line 2	Please confirm the information you're proposing to make available to scheme members.	
Administrator Address Line 3	Please confirm the information you're proposing to make available to scheme members.	
Administrator Address Line 4	Please confirm the information you're proposing to make available to scheme members.	
Administrator Address Line 5	Please confirm the information you're proposing to make available to scheme members.	

Area or data item for consideration	AVC provider connects directly	Response
Postcode	Please confirm the information you're proposing to make available to scheme members.	
Implementation and Ongoing	<p>Please provide details of all costs associated with connecting the scheme's AVC members to a dashboard. An indicative list of areas to consider is below. Please note this may not be exhaustive, and you should add anything we may not have considered:</p> <ul style="list-style-type: none"> • Initial Implementation and connection costs • Helpline or other member support costs • Transaction costs • Costs for data related activity 	
Costs and Charges	Please show implementation and ongoing costs separately.	
	Please advise if you're proposing to provide the URL to where the information is published, if so, provide details.	
SIP URL	Please advise if you're proposing to provide the URL to where the information is published, if so, provide details.	
Implementation Statement URL	Please advise if you're proposing to provide the URL to where the information is published, if so, provide details.	
Annual Report	Please advise if you're proposing to provide the URL to where the information is published, if so, provide details.	

It would be helpful to understand whether the approach you will be taking in respect of this pension arrangement will be the same for all AVC pension arrangements you administer:

One approach for all AVC pension arrangements/different approaches taken depending on particular circumstances (*please delete as applicable*).



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PASA is a Community Interest Company and our full name is Pensions Administration Standards Association

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