

# Early connection guidance

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Occupational pension scheme trustees (pension providers) will have the option to onboard (i.e., connect to the central digital architecture (CDA)) early.

This applies to pension providers who have a staging date and those (UK (United Kingdom) pension providers with less than 100 relevant members (i.e., active, and deferred members) who do not).

## Background

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Under the current legislative proposals any pension providers who wish to connect early will need to apply to the Pensions Dashboards Programme (PDP) acting on behalf of the Money and Pensions Service (MaPS). When applying to onboard early, pension providers must have regard to our guidance.

Before deciding whether to grant an application for early or voluntary onboarding, the PDP must consult with the Pensions Regulator (TPR). TPR consultation can be dispensed with when TPR and PDP agree it is not needed.

Compliance requires connection compliance within the connection window. The effect of a successful application is modify/open the provider's connection window:

- **for pension providers with a staging date, the effect is to open the connection date from a month before the new connection date until the end of their existing staging window.** For example, for a pension provider with an existing staging date of 1 January 2025, their original connection window would open from 1 December 2024 and close on 1 January 2025. If the pension provider wanted an earlier connection on 1 July 2024, then the new connection window would open from 1 June 2024 but still close on 1 January 2025
- **for pension providers with less than 100 members (i.e., no staging date under the current legislative proposal) the effect is to open the connection window a before the connection date and close on the connection date.** For example, for a new pension provider that wanted to connect on 1 July 2024, their connection window would open on 1 June 2024 and would close on 1 July 2024

Also, the pension provider's duty to co-operate applies from the date the application is granted.

## Proposal

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We want to encourage early onboarding and make dashboard coverage be as comprehensive as possible from as early as possible. Therefore, when considering a pension provider's application, we start from the position of being in favour of granting the application unless:

- we do not have the operational or system capacity to onboard the pension provider.
- where capacity is limited priority will be given to (in this order):
  - Pension providers using existing endpoints, (for example connected ISPs (Integrated Service Providers))
  - The larger pension providers measured by the number of relevant members

## Timing

We want to protect our operational resource from applications that have minimal effect, and we want to be able to plan the application of our operational resources. Therefore, we want to be clear what: the minimum application notice period is; and the minimum period by which to bring forward when a connection window opens.

Given that:

- operationally, we consider we will need about 3 weeks to process an application (check capacity etc.), and
- we wish to give TPR at least 3 weeks as part of our consultative step (although we may agree separately with TPR when this not required)

we consider this means:

- **for all pension providers**, to apply at least 2 months before the date the new/revised connection window opens, and
- **for pension providers with a staging date only**, we will only entertain applications to connect early when it means the proposed new connection date is at least 1 month before the current staging date

For example,

- take a pension provider with a staging date of 1 January 2024. Its connection window opens on 1 December 2023 and closes 1 January 2024
- if the pension provider wanted to connect early, say, by 3 months (1 October 2024), then this would mean its new connection window opens on 1 September 2023 and still closes on 1

January 2024 – the end date stays the same

- the application would be made before 1 July 2023 as the effect is to open the connection window on 1 September 2023 (i.e., with 1 July 2023 being 2 months before the new date when the window opens)

Pension providers should be thinking about their connection date (and early application) many months before their staging date – as per [TPR's and our guidance for pension providers on getting ready to connect](#).

## Applications

Applications must be made by each pension. This does not prevent bulk applications by, say, an ISP on behalf of several pension providers. These will not, however, be joint applications, but a bundle of independent applications. Therefore, if an ISP were applying on behalf of 100 pension providers, we could grant the permission in respect of 97 and reject the other 3.

The pension provider must confirm they are ready to onboard early, and they are aware of the consequences.

As with all applications, we can turn them down if we think they are malicious, vexatious or in bad faith.

## Systems and Processes; consulting with TPR

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Operational systems processes will have to be developed to implement this process and to set out the arrangements we will have with TPR.

## Consultation Questions

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1. Do you consider the notification requirement to be reasonable?
2. Do you consider the minimum requirement for at least a month's extension (for pension providers with an existing date) to be reasonable?