

Early connection guidance

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Background

Introduction

1. This early connection guidance is statutory guidance. It applies to the trustees of occupational pension schemes (schemes) who are looking to connect their scheme to the dashboards ecosystem before they are obligated to do so.
2. These trustees should be thinking about their connection date (and early application) many months before their connection deadline or when they want to connect (if earlier) – see [TPR's guidance for schemes on getting ready to connect](#).

Background

3. Pensions dashboards are apps, websites or other tools which will help individuals view their pensions information online. They will bring together an individual's pensions which they haven't taken, including their State Pension, as well as occupational and personal pensions (including those with an insurer), to support better planning for retirement and growing financial wellbeing.
4. This early connection guidance is issued by the Money and Pensions Service (MaPS). MaPS set up the Pensions Dashboards Programme (PDP) in 2019 to design and create the pensions dashboards ecosystem and the supporting governance framework.
5. The pensions dashboard ecosystem contains the central digital architecture (CDA) that will make pensions dashboards work. It will connect millions of individuals to their information across thousands of pensions, via multiple pensions dashboards. For more information about the pensions dashboards ecosystem and its components, see: <https://www.pensionsdashboardsprogramme.org.uk/ecosystem/>.
6. MaPs is also responsible for operating its own dashboard.

Purpose and audience

7. This guidance details how **scheme trustees** can apply to PDP to connect early to the CDA)¹. This includes schemes who:
 - a. have a connection deadline, and
 - b. those schemes with fewer than 100 relevant members (i.e., active, and deferred members) who do not have a connection deadline.

Jurisdiction

8. This guidance applies to all United Kingdom schemes who wish to apply for early connection.

¹ under regulation 16 of the Pensions Dashboard Regulations 2022.

Use/evidence

9. This is statutory guidance. Schemes must have regard to it when complying with their dashboard duties. Should they depart from it, it would be sensible to have a good reason (including being able to demonstrate how the same outcome has been achieved under an alternative path).
10. This guidance may be admitted in any proceedings relevant to the scheme's compliance with their dashboard duties – this also applies to the obligations owed by any other party (for example, a sponsoring employer or administrator). It will be the decision of the body hearing the proceedings (including any regulatory proceedings conducted by the FCA or The Pensions Regulator (TPR)) to assess the evidential weight to be attached to any standard or guidance admitted.

Version

11. This is the November 2022 version of the early connection guidance.

Guidance

Effect of early connection

12. Compliance requires connection within a pensions provider's connection window. The effect of a successful early connection application is to modify/open the provider's connection window:
 - a. **for schemes with a connection deadline, the effect is to open the connection date from a month before the new connection date and for the window to still close at the end of the existing connection window.** For example, if you are a scheme with an existing connection deadline of 31 January 2025, your original connection window would open on 31 December 2024 and close on 31 January 2025. If you sought an earlier connection date of 1 July 2024, then this would mean the new connection window would open from 1 June 2024 but would still close on 31 January 2025
 - b. **for schemes with fewer than 100 members (ie currently with no connection deadline) the effect is to open the connection window a month before the connection date they apply for and for the window to close on the connection date.** For example, if you wanted to connect on 15 July 2024, this would mean your connection window would open on 15 June 2024 and it would close on 15 July 2024. Also, your duty to co-operate with the PDP applies from the date the application is granted.
13. A successful application only extends or opens the period within which a scheme may connect. It does not remove the need for the scheme to go through the connection process. As part of this process, the scheme will have to validate it is the scheme it says it is.
14. Once a scheme connects to the CDA within its connection window, then all the dashboard legal duties apply from this date.

Our approach to applications: general

15. We welcome early connection as this will help to accelerate comprehensive dashboard coverage. Therefore, when considering a scheme'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 scheme. If our system capacity is limited, then priority will be given to applications (in this order):
 - a. schemes using existing endpoints, (for example, connected Integrated Service Providers (ISPs)), and
 - b. the larger schemes measured by the number of relevant members

Our approach to applications: consulting and engaging with TPR

16. We will consult with TPR before we make any decision on an application (that is unless we agree with TPR consultation is not needed). TPR is also in a better position to check whether there are any issues with the application or the applicant.
17. If TPR objects to the scheme's early connection or raise any issue in relation to the application, then we will usually follow their suggested course of action unless we have a good reason not to follow it.
18. TPR will be able to share with us any further scheme data that we do not hold but need to process the application and then get ready for the pensions provider's connection.

Our approach to applications: application timings

19. To protect our operational resource:
 - a. the minimum application notice period is, **for all schemes**, at least 2 months before the date the new/revised connection window would open
 - b. the minimum period by which to bring forward when the connection window opens, **for schemes with a connection deadline only**, is at least 1 month before their current connection deadline
20. For example:
 - a. say you are a scheme with a connection deadline of 31 January 2024 - your connection window would open on 31 December 2023 and close on 31 January 2024, and you wanted to connect early, say, by 3 months (1 November 2023),
 - b. then this would mean your new connection window would open on 1 October 2023 and still closes on 31 January 2024 – the end date stays the same, and
 - c. the application would need to be made two months before the new connection window opens (1 October 2023), ie before 1 August 2023

Our approach to applications: processing applications to a decision

21. Our aim is to have made and notified the applicant of our decision within 4 weeks from the date the application was submitted. We will update our records for the scheme and will also let TPR know what our decision is so they can update their records. Both we and TPR will then work on the basis of the new connection window.
22. If we are minded to refuse an application, then we will provide the applicant with a summary of the proposed reasons for the refusal (including any objections from TPR) and invite further submissions before we make a final decision.
23. Sometimes we will ask the scheme for more information before we make a decision.

Applications

24. Application form details will be available soon.