

## LOCAL PENSION BOARD

### Report of the Chief Fire Officer

28 January 2025

### Pension Update

Status: To note

### Purpose of the Report

- 1.1 The purpose of the report is to provide Members with scheme information, together with updates on current issues and the pension dashboard

### Recommendations

- 2.1 That the North Yorkshire Local Pension Board
- **notes** this NYFRS pension update and
  - **formerly nominates** WYPF, and their Integrated Service Provider (ISP), Bravura, as NYFRS preferred choice to join with the pension dashboard ecosystem at paragraph 8.7

### Scheme Membership Information

- 3.1 The active membership of the firefighters' pension schemes is taken from GAD valuation data as at 31 March 2024 for Tax Year 2023/24. All firefighters are in the 2015 scheme now. Old schemes were closed to accrual at 31 March 2022.

3.2

Active Membership Total	611
Wholetime	295
On-call	316
Leavers	49 (not included in the total number)
Opted Out	19

- 3.3 Last year there were 641 actives, so the numbers are going down. The firefighters' pension schemes are unfunded schemes where benefits are paid out of contributions and Government top-up grants. HM Treasury is looking to increase all contributions rates by 0.2% to align the average rate to the target rate which was lower than expected in the 2020 valuation results.

Home Office have launched their formal consultation on the amendments to the Firefighters' Pension Scheme (England) Regulations 2014.

The consultation will look at the changes required to achieve the target member contribution yield which includes:

- achieve the target yield over 1 October 2025 to 31 March 2027, and future valuation periods
- update the member contribution structure to encourage scheme participation and reduce opt-outs
- ensure the member contribution structure is administratively sustainable
- ensure due regard to the Public Sector Equality Duty.

3.4 The consultation will close on 29 January 2025

### **Pension Remedy – Sargeant**

- 4.1 In 2015, the government introduced new laws which resulted in a new pension scheme for firefighters - the Firefighters' Pension Scheme 2015 (FPS 2015). These laws included protection for some members of the existing schemes (FPS 1992 and FPS 2006) who didn't join FPS 2015 either straight away or at all, depending on their age. Following a legal challenge known as the Sargeant judgement, the courts determined that the protections given to members were age discriminatory.
- 4.2 On 15 July 2019, the government accepted the court's decision and confirmed that they would engage with the Employment Tribunal to agree how to fix (remedy) the discrimination. The government confirmed the remedy would apply across all public sector schemes and therefore is known as the 'Sargeant Remedy' for firefighters but also as the 'McCloud remedy' across the public sector and the 'Age discrimination Remedy'.
- 4.3 The Police and Firefighters Pension Scheme regulations 2022 came into force on 1 April 2022. The firefighters Pension Scheme (Remediable Service) regulations 2023 came into force on 1 October 2023. To allow for tax implications of remedy to be rectified two set of regulations have been published: the Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) Regulations 2023 (legislation.gov.uk) Tax no.1 and no. 2.

### **Pension Remedy Period**

- 4.4 'The Remedy period' is the period from 1 April 2015 to 31 March 2022.
- 4.5 The changes to remove future discrimination were brought into being on 1 April 2022 which means all future service benefit for all members is accrued within the FPS 2015 scheme from that date. Benefits already accrued in either the FPS 1992 or FPS 2006 are fully protected under those schemes.
- 4.6 The changes to remove past discrimination came into force on 1 October 2023. Members who moved into FPS 2015 within the remedy period will have their benefits converted to their legacy final salary scheme (either FPS 1992 or FPS 2006) for the whole of their service in the remedy period.
- 4.7 The complications arise as there are many different scenarios that result in the changes to remove past and future discriminations for active, deferred and pension members. In order to inform individuals, all pension fund members will receive a remedial service statement (RSS).

### **Statutory Requirements and Timetable for Remedial Service Statements (RSS)**

- 5.1 Through the Commissioners' Corporate Governance Framework, the Chief Fire Officer holds delegated responsibility in relation to the Firefighters' Pension Scheme Discretions, on behalf of the Scheme Manager, who is the York and North Yorkshire Combined Authority Deputy Mayor. Responsibility for Statutory deadlines and for providing RSS is met by the NYFRS Payroll and Pension team who work closely with the Pension Scheme administrator, West Yorkshire Pension Fund. If our statutory deadlines are not met, the pension regulator can impose a charge.

- 5.2 It is important to note that the regulations allow 18 months for pension administrators to complete the remedy exercise (i.e., until March 2025). **Pensioner** members who retired before 30 September 2023 and have service within the remedy period, will be provided with an RSS as soon as reasonably practicable from 1 October 2023. This is known as Immediate Choice (IC) or IC-RSS.
- 5.3 There were several policy issues on the application of tax and interest. There are on-going technical issues with regards to calculating the tax charges due on remediable lump sums which is causing a delay in issuing Immediate Choice Remediable Service Statements (IC-RSS).
- 5.4 The Government Actuaries Department (GAD) are working with pensions administrators to provide additional guidance on how to deal with these cases following the publication of HMRC's September 2024 newsletter. Administrators are currently waiting for this guidance to be made available. GAD are also working with HMRC as they feel that the guidance does not cover all scenarios and as such there will still be cases that will not be able to be processed. WYPF administrators have been informed to process these cases (Red Category) ahead of legislation coming into force. This is the decision that the Local Pension Board made on 24 October 2024.
- 5.5 The Unauthorised Tax issue affects members who fall into the red category i.e. unprotected and taper protected legacy FPS 1992 members who elected for maximum lump sum (and paid an unauthorised tax charge) when they originally retired. The table below demonstrates each category of case:

Green	Amber	Red
<ul style="list-style-type: none"> <li>• Legacy FPS 2006 members with <b>no</b> eligibility for Matthews 2 or outstanding election</li> <li>• Legacy RDS modified members with <b>no</b> eligibility for Matthews 2 or outstanding election</li> <li>• Legacy FPS 1992 members who retired with restricted commutation (i.e. age 50 with 25 years service)</li> <li>• Legacy FPS 1992 members who remain within authorised limits (i.e. no lump sum or with HMRC limit)</li> </ul>	<ul style="list-style-type: none"> <li>• Higher tier ill health (single source ill health)</li> <li>• Protected and *taper protected legacy FPS 1992 members who elected for maximum lump sum (i.e. paid an unauthorised tax charge) <i>*who at point of retirement had <b>not</b> tapered into FPS 2015</i></li> <li>• Legacy FPS 2006 members <b>with</b> an outstanding Matthews 2 election</li> <li>• Legacy RDS modified members <b>with</b> an outstanding Matthews 2 election</li> </ul>	<ul style="list-style-type: none"> <li>• Unprotected and *taper protected legacy FPS 1992 members who elected for maximum lump sum (i.e. paid an unauthorised tax charge) <i>*who at point of retirement had tapered into FPS 2015</i></li> </ul>

- 5.6 Administrators will be prioritising certain categories of pensioner members, based upon the level of impact of remedy to their benefits. WYPF have now started production of the IC-RSS for those members in the green and Amber category. The indicative timetable for sending out RSS to **pensioner** members was highlighted in the July 2024 report to Pension Board, however all pensioners members will now be processed by the statutory deadline of 31 March 2025 due to the WYPF system upgrade issues which are outside NYFRS and WYPF's direct control.
- 5.7 **Active** and **Deferred** members were due to receive their Annual Benefit Statements (ABS) – Remedial Service Statements (RSS) by 31 August 2024. ABS/RSS 2024 must show 'rolled back' position of the benefits members built up in their legacy schemes, which do unfortunately cause some complexities as additional data and software is required to produce these calculations. WYPF administrators issued 310 out of scope (not impacted by the pension remedy) ABS to members by 31 August 2024 53% of the total membership. WYPF confirmed 283 members or 47% did not receive an ABS-RSS where the ABS breach of law has been reported to the Pension Regulator by NYFRS on 01 October 2024 and by NYFRS on 24 October 2024.

The **ABS/RSS will provide:**

- current value of both their legacy final salary benefits
- reformed FPS 2015 benefits for the remedy period

- projected benefits to normal pension age for active members. The normal pension age for FPS 2015 is age 60. Members can still retire at the age of 55 if they have links to their old (legacy) scheme membership (transitional members).
- 5.8 **Pensions Saving Statements (PSS)** - this a written summary of the amount of contributions paid into your pension scheme during a particular tax year.
- 5.9 Where members have changes in 'pension input amounts', which for example could occur if member benefits exceed the annual allowance, then a Pension Saving Statement (PSS) is usually issued. The annual pension allowance for 2023/2024 has risen to £60,000. If a member receives a Pension Saving Statement (PSS) for the 2023/24 tax year, they have exceeded the allowance, and they must complete a self-assessment by 31 January 2025. They also have until 31 July 2025 to use the "Scheme Pays" facility, which reduces the firefighters' pension in exchange for the outstanding tax due to HMRC to be met by the fire authority. If a member has not received a PSS for 23/24, they may need to self-assess with a provisional figure. Members can find [guidance online](#) about using provisional figures in their Self-Assessment return. This link gives further information on how to provide an estimated figure, there is no additional requirement beyond that a member calculates it to the best of their ability.
- 5.10 PSS was expected to be produced by 6 October 2024 and WYPF clarified the position in their report in September 2024 that a breach in issuing the PSS is unlikely to occur even if this after the 6 October deadline. For members affected by the remedy, their pension history must be rechecked for the years in the remedy period, including the tax position. If any member exceeded the allowance in any year, they will receive a Remediable Pension Saving Statement (R-PSS). Those members must submit details to HMRC about the R-PSS within three months of receiving it, using HMRC's digital service. HMT legislation permits a deferment of 3 months from receiving data. WYPF are therefore confident for those members affected by the delay in the ABS-RSS not being issued by 31 August 2024 will by WYPF applying this deferment produce within 3 months of receiving that data the PSS.
- 5.11 WYPF have stated that "For members that have an existing Scheme Pays Debit the majority of PSS have been sent. This is because we know who these members are from previous year's Annual Allowance breaches and Scheme Pays elections. We are currently working on the remaining PSS and they should be produced by the end of this month." To be transparent, WYPF have mentioned this in the ABS-RSS breach report filed with the pension regulator in October 2024.
- At this stage, if any breach of law occurs in relation to PSS then WYPF will report the breach to the regulator as will NYFRS. Further information will be communicated to members in due course.
- 5.12 Members who started their service on or after 1 April 2015 will not be affected by WYPF software issues and have received their ABS only (no RSS) by 31 August 2024 – 310 members in total.

### **Current NYFRS Pension Remedy position**

- 6.1 **Resources** - The following data (5.3) shows the information that has been and continues to be processed by the Payroll & Pension Team who are working hard to meet the required deadlines. The lack of resources has been included in the risk registers. A second Senior Pension Advisor joined the team on 08/01/2025 and currently two Pension Administrator roles are advertised due to one employee leaving NYFRS at the beginning of January and a second applicant not starting in October 2024.
- 6.2 **Contingent Decisions** - The Home Office have issued the update relating to the Sargeant remedy contingent decision position for those members who had opted out, and whose legacy scheme was FPS 1992 and who are affected by the remedy. Please note the Local Government Association (LGA) have removed contingent decision guidance whilst they are awaiting the outcome of Government's discussions. The guidance from Home Office will cover the process on how to process cases, where members would have a mixture of benefits i.e. FPS 1992, FPS 2006 and FPS 2015. Both LGA and Home Office support a temporary pause to be put in place

until further notice. If a contingent decisions member is due to retire, then the case will be processed manually by the administrators.

### 6.3 Data processing to required deadlines to meet statutory requirements:

30 Sept 2023	<b>Completed</b>	Remedy Data (in line with guidance 2021) cleansed / sent to WYPF
01 Mar 2023	<b>Completed</b>	Finalised Data sent to WYPF following queries
2 May 2024	<b>Completed</b>	Contributions data for GAD (actuary) calculator request from WYPF for RSS
9 July 2024	<b>Ongoing</b>	WYPF has raised further queries regarding the financial data which are being worked through.
17 July 2024	<b>Ongoing</b>	WYPF advised to re-run GAD data through GAD calculator to reflect NS&I rates update. GAD data is being recalculated with the latest NS&I updated rates.
24 Jan 2025	<b>Completed</b>	186 Non-Continued Professional Development (CPD) members' data returned to WYPF in data upload and GAD format – 1488 lines processed
29 Jan 2025	<b>to be finalised</b>	188 'CPD full day' members – 1504 lines to process
31 Jan 2025	<b>to be finalised</b>	74 'CPD non-full day' members – 593 lines to process

### 6.4 Pension Remedy data processed:

<b>576 (100%)</b>	GAD data completed at 2 May 2024 and sent to Pension Administrator (WYPF). Further work is needed to reflect the NS&I rates' changes and identification of Non-CPD and CPD members.
<b>2 (100%)</b>	Number of Added Pension Refunds made by 31 Mar 2024
<b>1 (100%)</b>	Ill health reassessment to be processed by 30 June 2024
<b>2 (100%)</b>	Contingent Decision made within the 2-month deadline since receipt.

### Retained Fire Fighters Remedy - Matthews

- 7.1 A legal settlement under the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000 allowed certain **retained firefighters** with service between 1 July 2000 and 5 April 2006 to become members of the Firefighters Pension Scheme.
- 7.2 These eligible firefighters were asked whether they wanted to join this scheme in an options exercise (first options exercise) which took place in 2014-2015. Elections to join had to be received by 30 September 2015. This was the 'first options exercise'.
- 7.3 More recently, this judgment was challenged at the European Court of Justice. The Court ruled that service going back to the start of employment *could* be taken into account. The government accepted that the same principles apply to certain retained firefighters, whether they have made a legal claim or not. A memorandum of understanding was agreed by the government, representative bodies, and Fire and Rescue Authorities (FRAs) on 9 March 2022.
- 7.4 Second options exercise is now taking place to allow eligible retained firefighters to buy pension service as a special member of the FPS 2006, backdated to the start date of their employment. The exercise will run for a maximum period of 18 months (October 2023 to March 2025) after it begins.
- 7.5 NYFRS is currently reviewing all the data from the first options exercise and has identified:

- **609 retained fire fighters** identified as in scope for the second options exercise and have received notification letters by 31 December 2023, then chased again in May-June 2024 when tracing agency ITM located “lost contact” members.
  - **308** retained firefighters responded; **268** members have not returned the forms; **9** firefighters expressed no interest; **24** deceased cases are on hold pending further clarity from the LGA on how to proceed with these cases.
  - By **30 June 2024 the data has been collated** to start the calculations process using GAD calculator for **294** expression of interest forms received. The Matthews remedy is ongoing. As of now, **186 out of 302 quotes** have been completed. The deadline for all cases is 31 March 2025.
- 7.6 If a deferred member has chosen to make a pension buyback under Matthews remedy (and they retire immediately; if aged 60 or above) they can choose for any buyback amount owed to be deducted from any pension lump sum (if applicable).
- 7.7 Pensioners who are in receipt of pension and are due pension arrears:
- If pension arrears and tax payments are due because of Matthews, they will be handled through the normal pensioner payroll process.
  - Members who want to pay arrears another way should note that they’ll need to complete a self-assessment to HMRC.
- 7.8 The Home Office is consulting on changes to the Firefighters’ Pension Scheme (England) Order 2006. This consultation is open until 17 February 2025 and looks at a range of proposed changes to the pension scheme, including extending eligibility for certain pension benefits and extending the 2023 Options exercise deadline to 31 March 2026. It can be accessed here: [Amendments to the Firefighters’ Pension Scheme: retained firefighters - GOV.UK](#)
- 7.9. The FBU continues to pursue issues relating to ‘aggregation’, pre-6 April 2000 transfers to wholetime, consequential loss and deceased Claimants in the Employment Tribunals. The claims in England were stayed until 14 January 2025. The Home Office has requested that the stay be continued. The FBU has declined to agree to a further stay and has asked the Tribunal to proceed with the claims.

## Pension Dashboards

- 8.1 A pensions dashboard is an online tool for people to access information about their pensions. In the UK, these dashboards will show information about pensions from different providers and the State Pension in one place.
- 8.2 In 2019, the UK government established the Money and Pensions Service (MaPS), which brought together the Money Advice Service, The Pensions Advisory Service and Pension Wise with the aim to create improved awareness of pension assets and pension options for scheme members.
- 8.3 Schemes have a duty to cooperate with requests from MaPS relating to connection to the ecosystem and would have to report certain information to MaPS.
- 8.4 For Fire and Rescue Authorities (FRAs), the deadline to start using Pensions Dashboards is 31 October 2025.
- 8.5 The Scheme Manager will be asked to formerly nominate WYPF, and their Integrated Service Provider (ISP), Bravura, as NYFRS preferred choice to join with the Pension Dashboard ecosystem.
- 8.6 The attached report at **Appendix A provided by WYPF** with regards to the Pension Dashboard explains that all scheme managers will be issued with a code to join the ecosystem and details of how to do so. NYFRS expect this to be issued 2 to 3 months prior

to your staging date, 31st October 2025. The report also explain the 'Timings and Deadlines' and by March 2025:

- WYPF matching criteria policy will be shared with all scheme managers
  - NYFRS will provide WYPF Dashboard contact details & Bravura contact details for registration to the ecosystem.
  - Scheme managers to decide on Dashboard provider
  - Discuss with Pension Board
  - Notify WYPF
- 8.7 This report suggests that the Pension Board formerly nominates WYPF, and their Integrated Service Provider (ISP), Bravura, as NYFRS preferred choice to join with the Pension Dashboard ecosystem.

## Communication

- 9.1 Communication to all pensioners, deferred and active members is key and further information is put out internally by way of weekly bulletins as well as placed on the website and individual updates provided where appropriate e.g., ill health retirements and Matthews' exercise. The NYFRS website is updated with the latest pension update available to members.
- 9.2 Communication with Trade Unions are ongoing where they can attend pension remedy update meetings and the Local Pension Board.
- 9.3 12 red category pensioners were written to in June 2024 with IC-RSS rollout update and tax implications explained. These members are affected by the guidance issues the pension administrators are struggling to implement in order to process these cases. Update letters will be issued to these members.
- 9.4 Following the communications issued last July to 138 pensioners (green and amber categories), further update letters will be issued to these members.
- 9.5 ABS-RSS update letters were circulated by WYPF before Christmas December 2024.
- 9.6 LGA has issued two factsheets to help members understand Unauthorised Payments and Annual Allowance and the impact remedy may have on them <https://fpsmember.org/news>
- 9.7 There is a dedicated member section for Matthews on <https://fpsmember.org/fps-2006-special-members>.
- 9.8 The FBU has issued a circular explaining to their members why they have to pay interest on their contribution adjustment [McCloud/Sargeant Remedy: payment of arrears of contributions and interest | Fire Brigades Union](#)
- 9.9 NYFRS sent out comms on 22 January 2025m in reference to Pension Saving Statements, Remediable Pension Saving Statements (R-PSS), Update regarding Annual Benefit Statement (ABS) - Remediable Service Statement (RSS), Pensions Dashboards, Matthews Remedy Progress Update, Arrears of Pension and Tax under Matthews Remedy, Government Consultation on changes to the Firefighters' Pension Scheme (England) Order 2006

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## Pension Dashboards

### History

In 2019, the UK government established the Money and Pensions Service (MaPS), which brought together the Money Advice Service, The Pensions Advisory Service and Pension Wise with the aim to create improved awareness of pension assets and pension options for scheme members.

The objectives for Pensions Dashboards are:

- they will make accessing pensions information, including information on individuals State Pension, easier by allowing people to see what they have in their various pensions at the touch of their smartphone, laptop, or computer
- pensions dashboards will put individuals in control of planning for their retirement
- pensions dashboards will provide an opportunity for engaged individuals to consider taking action to consolidate their deferred small pots

### Regulatory Framework

As you would expect from quite a technologically advanced legislative and regulatory framework there are a number of Government bodies covering the wider regulations.

It is proposed that MaPS will set standards covering the legislative requirements for:

- Data
- Technical infrastructure
- Design and reporting including monitoring compliance
- A Code of Connection covering security, service and operational requirements.

A new regulatory function will be created overseeing this process called the Governance Register. The governance register will work to ensure that the dashboard ecosystem is kept safe and that the required security and performance standards are met.

The Pensions Regulator (TPR) will continue as WYPF's primary regulator and will also be able to take enforcement action if schemes fail to comply with any of the requirements in these regulations. Fines for dashboard-related breaches can be up to £5,000 per individual scheme member breach and £50,000 in other cases.

Schemes have a duty to cooperate with requests from MaPS relating to connection to the ecosystem, and would have to report certain information to MaPS.

The regulations have been developed to be consistent with existing data protection requirements, including the UK GDPR. Therefore, this remains the responsibility of the Information Commissioner's Office to investigate any breaches of data protection law and take the action it considers appropriate, in the usual way.

## **What is Required of Pensions Schemes and WYPF?**

The date a pension scheme is required to join the MaPS pensions dashboard is set out in legislation and the staging date for most Public Service Pension Schemes is 31 October 2025. This includes the LGPS and the FPS.

Schemes have a duty to co-operate with requests from MaPS and report information to MaPS. These are set out in the proposed legislation and need to be retained by WYPF or pension scheme managers for at least 6 years.

DWP have proposed that it would be for the scheme manager to set their own matching criteria i.e. decide if a scheme members pension record matches an individual requesting pensions scheme information through the ecosystem. Scheme managers need to set a policy for how they will match and what criteria they will use.

The process of accessing information on dashboards rests on the consent of the individual i.e. scheme member. The nature of an individual's consent must be clear, explicit, understood, and informed. In other words once the members knows the data is available to them on the Dashboard they may request to opt out and have the data removed. However, it should be noted that there is no central database within the ecosystem that holds personal information or pensions information.

### **Matching Criteria (WYPF current understating)**

Due to the Pension Dashboard reset, matching criteria options and methodology is still changing. The following is based on WYPF's current understanding, however, we expect this to be refined by PDP in the coming weeks.

Currently matching criteria are 3 matching pieces of data, such as: Surname, National Insurance number, and Date of Birth.

If all three criteria match the member will have access to their data, which initially, will only be the pension values shown on their last Annual Benefit Statement (ABS)

If they do not match further criteria will be requested, such as: address, marital status, first name etc. There is a "matrix" of possible matching criteria that can be used and if a match is found access to Dashboard data will be allowed. If there is only a partial match, one or two matching criteria, WYPF will make contact with the member to verify and validate.

Appendix A demonstrates the possible matching matrix and results of our data testing. As you will see we tested in excess of 200,000 members, LGPS & FPS, on our system and have successful matching in excess of 94% in all samples.

We understand that the current thoughts around matching criteria may be amended in the new year. The information included in this document and appendix is our current understanding and should be enough for scheme managers to discuss and consider their responsibilities under the Pension Dashboard legislation.

WYPF will develop our policy on how we will match when clarity has been received.

### **Please Note:**

WYPF cannot implement multiple matching criteria policies. We will ask all scheme managers (LGPS AA & FRAs) to formally accept our matching policy once confirmed by us. You may decide not to use our matching criteria, in which case we will ask you to inform WYPF of your decision. If you decide to use alternative matching criteria you will be required to satisfy the Pension Dashboard legislation yourself by contracting your own Integrated Service Provider (ISP) to connect with the Dashboard ecosystem.

Private Pension schemes will connect first and it is possible following their feedback to DWP matching criteria may be subject to further change.

### **What do Scheme Managers need to do?**

Scheme Managers (LGPS AA & FRAs) will be asked to formally nominate WYPF, and our Integrated Service Provider (ISP), Bravura, as your preferred choice to join with the Pension Dashboard ecosystem. You may wish to discuss this with your Pension Board.

The ISP provider is the conduit between WYPF and the Dashboard. They provide the connection onto the PDP eco system as WYPF do not have the resource or the skills to do this internally. However, it is WYPF that will perform all duties with regards to uploading data and implementing matching criteria and validating scheme members.

TPR and DWP are both conducting a campaign of nudge communications to ensure all scheme managers are aware of their responsibilities and actions.

All scheme managers will be issued with a code to join the ecosystem and details of how to do so. We expect this to be issued 2 to 3 months prior to your staging date, 31<sup>st</sup> October 2025.

Once you have received this code it needs to be forwarded to WYPF in order for your scheme to be put live onto the system. More details will follow nearer to the time.

### **TPR Exchange**

TPR will contact each pension scheme in scope for pensions dashboards before their scheduled date for connection.

Scheme Managers need to ensure their contact details for their scheme are up to date on [Exchange](#).

Your details must include a Scheme Manager contact and 2 Dashboard contacts.

For FPS the Scheme Managers will need to submit details for all three schemes (92, 06 & 15).

### **Timings and Deadlines** (WYPF current understanding)

The staging date for many Public Service Schemes including LGPS & FPS is 31 October 2025. Of course, the data needs to be accurate and all queries resolved. ABS must be produced and data uploaded to the ecosystem and tested for accuracy prior to October 2025.

To do:

From December

- WYPF to communicate with LGPS partners, FRAs, employers & payroll providers their responsibility

- Employer and payroll provider training sessions delivered

By March 2025

- WYPF matching criteria policy shared with all scheme managers
- [Provide WYPF Dashboard contact details & Bravura contact details for registration to the ecosystem.](#)
- Scheme managers to decide on Dashboard provider
- Discuss with Pension Board
- Notify WYPF

By 30 April 2025

- All monthly postings up to February submitted to WYPF
- All monthly postings up to February data queries resolved by LGPS partners, FRAS, employers & payroll providers
- All monthly postings up to February processed by WYPF
- Month 12, Year End, postings received by WYPF

By 30 May

- Month 12 data checked and uploaded to records

By 31 August

- ABS & ABS-RSS produced
- Data uploaded to dashboard
- Data tested

By 30 September

- Scheme managers to have registered with the eco system
- Confirmation provided by Dashboard WYPF are preferred provider
- Access granted to WYPF for all scheme managers

By 31 October

- WYPF audited by DWP to permit access to Dashboard live
- GO LIVE!!

**Matt Mott**

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December 2024

## Pensions Dashboard Matching - Results

### Background:

The Pensions Dashboard Programme requires schemes to match potential member details via information sent through the ecosystem by the user.

Where a match is made the scheme is to send back the members pension details.

A piece of advanced analytics work has been developed which assesses the details that may be sent through the ecosystem by the user from which WYPF can match and modelled the various data matching scenario's.

This report outlines the results from this data analytics and modelling.

The regulations around both providing members with their pension's details and GDPR remain significant.

The ICO via GDPR require that we do not expose pensions details to the wrong person. This will remain and be part of the Pensions Dashboard programme. The Pensions Regulator (TPR) requires we match as many as we can, accurately. TPR also require that a schemes data quality be improved to ensure WYPF matches the optimum number.

It is therefore for WYPF to establish the matching balance we wish to use and ensure we have maximised our data quality provision. The WYPF Board, and shared services clients, are required to formally sign off what matching criteria we adopt for Pensions Dashboard.

The Money Advice and Pensions Service will track the level of matches we make in real time. TPR may investigate where matches are lower than expected or to the general median.

### Objective:

This data matching test assessed matching rates at an overall level, per client level and we have individual employer level data.

### Data Match Scenario's to Test:

The list below describes the data elements users can input to the dashboard from which we can match:

- first name and surname
- date of birth
- current address
- National Insurance number
- previous surname
- previous address
- email address.
- mobile phone number.

<https://www.pensionsdashboardsprogramme.org.uk/data-standards/find-data/>

<https://www.pensionsdashboardsprogramme.org.uk/wp-content/uploads/2020/12/PDP-data-standards-guide.pdf>

Matching can be done a number of ways. PDP have suggested three primary keys on first pass as shown below and if this fails to Match to a secondary set as a second pass, as shown below, to establish whether this is the member of the scheme. This is prior to implementing a partial match scenario.

#### First Pass

- Date of Birth (DOB), Nino and Surname

#### Second Pass Senario's

- First name, DOB, Surname
- Previous Surname, DOB, First Name
- Postcode, DOB, Surname
- Nino, Surname, Postcode

#### **The Results:**

Once the matching has been completed this will identify the areas needed for data quality improvement.

#### Looking at whole database (all shared service & Fire clients) - First Pass

- Date of Birth + NINO + Surname

243,919 out of 243,993 persons matched against this criterion i.e. a 99.97% match rate to this combination of the 3 fields.

The remaining 74 (0.03%) represent 34 pairs of "Person" records where National Insurance Number check digits have been changed between different periods of membership. These will be reviewed manually by staff to resolve and fix (determine which is correct).

#### Second Pass – Scenario's

- 2A First Name + DOB + Surname

243,561 out of 243,993 persons matched against this criterion i.e. a 99.82% match rate to this combination of the 3 fields.

432 potential non-matches (0.18%). Again these will be resolved.

- Previous Surname + DOB + First Name

Only 33,133 out of 243,993 persons (13.58%) unique combinations of the 3 fields. The reason for this is the previous surname. Previous Surname doesn't apply to everyone. Historically, married females changed surname but this custom is no longer always undertaken, so we do not hold information in that field for everyone.

We have 3 clients with higher than average scores, [REDACTED]. This is due to the previous surname field is actually holding the same value as Surname. So not a true previous surname. This has come across in client take on routines.

- Post Code + DOB + Surname

231,361 out of 243,993 persons matched against this criterion i.e. a 94.82% combination of the 3 fields.

12,632 potential non-matches i.e. 5.18%. This is less strong than the above as Post Codes are only used for UK based Persons. Not all overseas addresses use a post code (or zip code etc), and overseas post/zip codes are stored in the body of the address as each overseas postal authority has different rules about the positioning of the post/zip code within the address.

- NINO + Surname + Postcode

231,717 out of 243,993 persons matched against this criterion i.e. a 94.97% combination of the 3 fields.

The reason again is as above.

Notes:

For the analysis any non-alphanumeric have been stripped out during comparison. This means any leading, intermediate and trailing spaces are removed along with any punctuation. The field is then forced into upper case.

For National Insurance numbers, only the first 8 characters are used – the last check digit (usually A to D) is ignored.

**Summary:**

The raw data will clearly match in significant numbers. We are confident in the data quality given the monthly data matching routines undertaken and annual benefit statement data validation work.

