CAMBRIDGESHIRE PENSION FUND

To:	Pension Fund Committee
Meeting date:	30 September 2025
Report by:	Mark Whitby Head of Pensions Mark.whitby@westnorthants.gov.uk
Subject:	Pensions Dashboards Update and Matching Policy
Purpose of the report:	This report provides an update on the progress made by the Fund in connecting to the Pension Dashboard infrastructure by the connection deadline of 31 October 2025.
Recommendations:	The Pension Fund Committee is asked to note the contents of the report and approve the Data Matching Policy at Appendix 1.
Enquiries to:	Mark Whitby Head of Pensions Mark.whitby@westnorthants.gov.uk

1. Background

1.1 The Government formalised its intentions to deliver pension dashboards through the Pension Schemes Act 2021 and, the Pension Dashboards Regulations 2022, following many years of discussions on how to engage individuals with their pensions savings.

1.2 There are a number of activities that the Fund will need to undertake to connect to the pension dashboards infrastructure by 31 October 2025 and to make data available to users by 31 October 2026.

1.3 This report provides an update on the activities required to connect to the infrastructure prior to 31 October 2025.

1.4 This report seeks approval for the Data Matching policy 2025.

2. Executive summary

2.1 The Fund is required to connect to the Pension Dashboards infrastructure by 31 October 2025 and be able to respond to requests from the public by 31 October 2026.

2.2 There are a number of activities that the Cambridgeshire Pension Fund will need to undertake to connect to the Pension Dashboards infrastructure and to make data available to users.

2.3 The Fund continues to work with its Additional Voluntary Contribution (AVC) providers Prudential and Standard Life to ensure members can easily access their details on the dashboard.

2.4 An update of progress made to connect to the Pensions Dashboards infrastructure is in section 3 of this report.

2.5 The Matching Policy can be found at Appendix 1, with further information on its necessity in paragraphs 3.2 to 3.7.

2.6 Guidance and additional information is continually being issued by the organisations involved in this initiative. The Fund will continue to revise its project plans and documentation to ensure compliance with all requirements.

2.7 The costs associated with connecting to the Pensions Dashboard infrastructure are detailed in section 5.1.

3. Issues and choices

Connecting to the pension dashboards infrastructure

3.1 The following table details the activities that need to be undertaken to ensure the Cambridgeshire Pension Fund can connect to the Pensions Dashboard Infrastructure by 31 October 2025.

Activity	Progress	Next steps
Procure, and conduct user acceptance testing (UAT) of the Integrated Service Provider (ISP) to provide the digital interface solution to connect to the Pensions Dashboards Infrastructure by 31 October 2025.	Procurement of Heywood ISP undertaken in August 2024. UAT of ISP successfully undertaken between February and March 2025. Scheme connection confirmed on 7th August.	
Undertake data quality improvement activities to ensure full matches and instant return of data when members utilise Pensions Dashboards.	Address tracing of deferred members is being undertaken in batches of 100 per week. Cleansing personal data that the ISP identifies as containing invalid characters which will otherwise prevent the upload of data to the Pensions Dashboards for those members. Processing of undecided leavers.	This work will continue through the rest of 2025/26. Please refer to the Data Improvement Plan.
Data Matching Policy that sets out the personal data required to achieve a full match and instant return of value data to the individual's Dashboard.	Matching Policy can be found in Appendix 1 and further information on the matching process can be found in paragraphs 3.2 to 3.7.	
Make necessary arrangements to ensure members have access to their Additional Voluntary Contributions (AVCs) data when accessing Pensions Dashboards.	Prudential (single source) Officers are working with Prudential to arrange for the secure transfer of data to the Fund for inclusion on the Pensions Dashboard alongside members' LGPS benefits. Following the completion of the variation agreement, the new AVC data view and interface was released in test version in late August. Standard Life (multiple source) Officers have submitted information to Standard Life in order to meet the connection deadline of 31 October 2025. This included a global unique identifier (GUID code) to enable the linking of main scheme	Testing of the interface and data view commenced in September.

	benefits with individual AVC benefits.	

Data – Matching Policy

3.2 Following the Pensions Administration Standard Association (PASA) updated guidance published in July 2025, the Cambridgeshire Pension Fund Data Matching Policy has been updated accordingly and approval from the Pension Committee is sought for implementation (the Committee were previously provided with a draft version of the Policy for review in June 2025).

3.3 Pensions Dashboards Programme Matching Policy can be located at Appendix 1.

3.4 The Policy sets out the personal data required to achieve a full match and instant of value data to the individual's Dashboard.

Full Match:

Where National Insurance Number, surname/alternative surname and date of birth are matched against the data held within the pension admin system full match will be established. In the absence of a national insurance number, a full match can still be achieved by matching additionally on Forename plus either Postcode or Email and Mobile.

3.5 An individual can achieve a partial match if they match on date of birth and surname plus at least one additional data item (postcode, email address or mobile phone number or forename).

3.6 Partial matching will return a message to the individual advising they may have a pension within this Fund but they need to provide more information via the contact details supplied within 30 days. If a match is subsequently confirmed a process will begin within the infrastructure to make the value data available to the individual's Dashboard.

3.7 All changes to the Matching Policy will be documented and records kept for six years in accordance with the Regulations.

Governance of the Pensions Dashboards Project

3.8 The project plan and RAID log is continually reviewed and updated to reflect updated or changing guidance from organisations such as the Pensions Dashboards Programme (PDP), PASA (Pensions Administration Standards Association), LGA (Local Government Association), and the ISP and administration software provider.

3.9 At the next meeting, the Pension Committee will be provided with a further update on the progress made, relevant updates to the overall initiative.

4. Relevant Pension Fund objectives

4.1 To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies, and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.

4.2 To provide scheme members with up-to-date information about the scheme in order that they can make informed decisions about their benefits.

5. Implications (including financial implications)

5.1 Resources and financial

5.1.1 The estimated budget for the various elements of ISP and Dashboard reporting costs are currently as below:

Element	Current Estimated Cost
ISP Implementation	£7,500 to £13,500
ISP Maintenance	£30,225 per annum
Insights Reporting	£4,912.50 per annum
AVC Interface and Data View	£5,835 per annum

5.1.2 All costs will be met by the Pension Fund and changes will be advised to both the Pension Board and Committee. The additional costs associated with the interface and AVC data view software developments have been added to the table above.

5.2 Legal

5.2.1 Failure to take all the necessary steps to connect to the pension dashboards infrastructure by 31st October 2026 will be considered a breach of the law unless an extension is approved. In practice TPR expects the Fund to connect by 31st October 2025 in line with the staging date for LGPS funds in the applicable statutory guidance.

5.3 Risk management

5.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below –

Risk	Residual risk rating
Incorrect/poor quality data held on the Pension Administration and Payroll platforms or delays with receiving information leading to incorrect information/delayed provision of information to members and stakeholders (risk 14).	Amber
Failure to administer the scheme in line with regulations and guidance (risk 17).	Green
The Pension Fund fails to comply with legal duties in connection with Pension Dashboards (risk 31).	Green

5.3.2 The executive summary of the Cambridgeshire Pension Fund risk register can be found here.

5.4 Consultation with key advisers

5.4.1 Squire Patton Boggs, the Fund's legal advisers, conducted a review of the paper for legal implications with no material issues raised.

6. Background papers

6.1 None

7. Appendices

7.1 Appendix 1 - Cambridgeshire Pension Fund Data Matching Policy 2025