Appendix 1

Pensions Dashboard Programme – Data Matching Policy 2025

West Northamptonshire Council
Cambridgeshire County Council
Administered in partnership

Contents

1. Introduction

1.1 This is the Pensions Dashboards Programme – Data Matching Policy (2025) of Cambridgeshire Pension Fund ("the Fund") managed by Cambridgeshire County Council ("the Administering Authority").

1.2 Cambridgeshire County Council and West Northamptonshire Council work in partnership to administer the Cambridgeshire Pension Fund. Under this arrangement West Northamptonshire Council is the lead authority shared service partner.

1.3 The Government formalised its intentions to deliver pension dashboards through the Pension Schemes Act 2021 and, the Pension Dashboards Regulations 2022 and The Pensions Dashboards (Amendment) Regulations 2023, following many years of discussions on how to engage individuals with their pensions savings.

1.4 Pensions Dashboards will enable individuals to access their active and deferred pensions information online, securely, and mostly in one place to support better retirement planning.

1.5 Pensions Dashboards will provide clear and simple information about a member's pension savings, including their State Pension and will also facilitate connection to any pensions individuals may have lost touch with.

1.6 The Cambridgeshire Pension Fund must connect to the Pensions Dashboards infrastructure by 31 October 2025 and be able to respond to find requests from the public by 31 October 2026.

2. Policy Objectives

2.1 The Fund's objectives related to this policy are as follows:

- To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
- To ensure robust processes, controls and risk management are in place.
- To manage the Fund in a fair and equitable manner and be accountable to the Fund's stakeholders.
- To ensure robust processes, controls and risk management are in place.

3. Purpose of this Policy

3.1 The purpose of this policy is to set out the options for the Pensions Dashboards matching criteria and the approach that the Cambridgeshire Pension Fund has taken and the reasons for this as required by the Pension Dashboards Regulations.

3.2 The matching criteria may evolve over time and as such the criteria may need strengthening or relaxing to ensure that sufficient matches are being made but without compromising the security of the data.

3.3 The Regulations require the Fund to keep a record of the Matching Policy and document any changes made to it along with relevant justifications.

4. Scope

4.1 Under the current remit of the Pensions Dashboard Programme (PDP), this policy covers scheme members who are in active membership, or hold a deferred pension, or have an AVC fund associated with the Fund.

5. Effective date

5.1 This policy was first approved by the Pension Fund Committee on dd Month yyyy.

6. Review

6.1 This policy will be reviewed by Fund Officers annually, and by the Pension Fund Committee every three years, or otherwise as and when required.

6.2 The policy has been subject to the following reviews:

Date of review	Effective Date	Type of review
dd Month yyyy	dd Month yyyy	First / publication

7. Matching Process

7.1 In order for members to access details of their pensions savings, they need to firstly undertake identity checks via the government's Pension Finder Service (PFS), from which find requests will be sent to all connected data providers. This identity service will check the individuals first name, last name, date of birth and current address.

7.2 Individuals will also be encouraged to provide other data to help match to their pension records (national insurance number, alternative first name and last name, previous last name and address, email address and phone number).

7.3 Once a find request has been activated, all pension schemes and providers must compare and match the user's personal details and return information for them to view.

7.4 In order for data to be returned to the individual's Dashboard, schemes and providers must determine to what degree the find data should match the Fund's records, known as matching rules.

8. Matching Rules for the Cambridgeshire Pension Fund

8.1 Following analysis of the Fund's data quality and recommendations from organisations such as the Pensions Regulator and Pensions Administration Standards Association (PASA) guidance, a decision has been made to apply the following matching rules. These rules will minimise the risk of returning the wrong individual's data.

8.2 **Full Match**

8.2.1 To achieve a full match and an instant return of value data, scheme members must provide their core data of surname/alternative surname, date of birth and at least the first eight characters of their national insurance number.

8.2.2 If these three core data items match what is held on the Fund's records, the individual's accrued and estimated pension data (value data) will be returned instantly to the individual's Dashboard.

8.2.3 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.

8.3 **Partial Match**

8.3.1 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).

8.3.2 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.

8.4 No Match

8.4.1 Where the member does not fully or partially match, no data will be returned to their individual dashboard. This result is most likely to occur when the individual has no liability within the Cambridgeshire Pension Fund (or because their membership status is currently out of scope of the Pension Dashboards Programme remit).

8.5 Justifications

8.5.1 PASA's original Guidance recommended just one rout to full match where national insurance number, date of birth and surname all matched. However, now PASA has extended their core Guidance as national insurance won't be a verified data item and will not always be provided by the saver. The extended guidance provides additional full matching rout with at least four verified data items including surname and date of birth.

9. Delivery

9.1 In preparation for the Pension Dashboards being made available to the public (the Dashboards Available Point), the ISP (Integrated Service Provider) console (that provides the tools to set, test and maintain scheme-specific matching rules) will be configured with these matching rules.

10. Monitoring

10.1 The appropriateness of these matching rules will be closely monitored using the ISP's suite of reporting tools. These reporting tools will monitor all activity regarding full and partial matching and provide management information to inform whether the matching rules need to be tightened or relaxed, whilst still providing the appropriate safeguards to security.

11. Contact

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