

## Pensions Dashboards Additional Voluntary Contribution (AVC) Support

March 2023

## Introduction

With AVCs normally being provided by a third-party provider, there is a challenge for pensions dashboards to display them as part of the underlying scheme. This note provides Broadstone's view on how AVCs will be shown on the dashboard.

Pension schemes will connect to dashboards over time according to their size and type. The Pensions Dashboards Regulations 2022<sup>1</sup> sets out the staging dates for schemes with more than 100 members.

A scheme's connection deadline is calculated based on the total number of active and deferred members across **all sections of the scheme** at the scheme year end that fell between 1 April 2020 and 31 March 2021. Pensioner members are excluded from this count.

The deadline applies to the whole scheme. If the scheme has multiple sections or members have AVCs in the scheme, these will all need to be connected by the same staging deadline.

As the AVC is an investment on behalf of the scheme then the primary duty to provide the information in relation to it is through the scheme.

The AVC provider should be liaising with the trustees about when the scheme will

connect with the pensions dashboards ecosystem, and how they can support the scheme to supply this information to the dashboard ecosystem after the scheme's connection date.

The Pensions Dashboards Programme data standards set out a number of different means for how pensions schemes can do this.

**Data Standards -** A Pension Link is a unique identifier that schemes may use to connect benefits together where different parts of the overall benefit are going to be provided by two (or more) different providers or administrators. The most common example of this is where the scheme administrator will send its main benefits to the dashboard and a separate provider of the AVCs will also send in AVC data. Dashboard display designers will be able to use this identifier to help display the information as being visually connected to the correct pension provider.

Hybrid pension schemes who have separate administrators for each section could use this too if they also wish to submit the benefit data separately but have them visually displayed together.

Pension schemes with benefit administration split in this way have three choices. To illustrate using the example of a defined benefit pension scheme with separate AVCs:

1. **Main scheme sends ALL data**: Agree that the main scheme administrator will send both the main scheme values AND the AVCs. In this option, the pension scheme will need to make sure it is getting a feed of relevant data from the AVC provider(s). If the AVC provider(s) does(do) not hold enough personal information to carry out its own matching process and achieve the same results as the main scheme, you should consider using this option.

2. Scheme and AVC provider send data separately WITHOUT link: Trustees could decide that it does not consider it too confusing for the two sets of data to potentially be displayed apart from each other if the AVC benefit was suitably named. In this case they may choose not to create a new unique identifier. However, Trustees are reminded that they are responsible for ensuring all of their user's benefits are displayed on dashboards. In the event that the naming of the AVC benefit is not clear, there is a risk that the member does not associate the benefit with the underlying scheme. This will lead to confusion and a potential increase in the number of calls to administration teams.

3. Scheme and AVC provider send data separately WITH link: If it is decided that both benefits are to be provided separately, but the Trustees decide it is important for the benefits to be displayed together, the main scheme must generate a Pension Link identifier and pass that identifier to the AVC provider. Both the main scheme and the AVC provider(s) will then need to populate the pension link field in their "view data" message. **Broadstones' View** – It is our view that option 3, from the above scenarios, represents the most appropriate method by which different sections of the scheme should be linked and displayed on the dashboards.

We recognise that for many schemes the AVCs are a legacy arrangement and we will need to ensure we liaise with the AVC providers in good time to ensure they understand Broadstone's preferred method and can connect with the right identifier.

Trustees will need to consider:

- What third party administered AVCs they have?
- How they think the benefits should be best represented on the dashboards?
- Advise us of this decision and allow us to communicate with the providers accordingly.

It would be beneficial for schemes to confirm any third party relationships that they support as part of their scheme, and Broadstone can undertake communications on their behalf.

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## Find out more

For more information on how Broadstone can help you, please contact your Broadstone consultant or our Pensions Dashboards Delivery Manager on:



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