

Pensions Dashboards Working Group

Data Matching Convention (DMC) Guidance

July 2025

Produced in partnership with:



Our Experts for Dashboards

PASA 

The PASA logo symbol is a stylized, overlapping 'P' and 'S' in a dark red color.

Version 2.0



Contents

1. Acknowledgement
2. Executive summary
3. Introduction
4. What's changed in this update?
5. Data provided in Find Requests
6. Core Guidance: 'Match Made' criteria
7. Core Guidance: 'Possible Match' criteria
8. Possible Match resolution processes
9. Monitoring matching during Testing Phase
10. Data improvement resulting from matching

Annex A – Original analysis of existing practices

Terminology and Abbreviations

See the [Pensions Dashboards Programme \(PDP\) Glossary](#) for definitions of dashboards terminology. Abbreviations used in this Guidance:








DOB	Date of Birth
ICO	Information Commissioner's Office
ISP	Integrated Service Provider
NINO	National Insurance Number

1. Acknowledgement


The Guidance has been carefully written with representation across a range of professional disciplines. PASA is grateful to the authors of the Guidance and their employers for their active participation in the Pensions Dashboards Working Group.



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This updated Guidance has kindly been designed by  Lumera

2. Executive summary

Data Matching Guidance is an evolving document

PASA Guidance is typically designed to help share best practice approaches with the administration community, based on actual experience. However sometimes PASA's Guidance needs to look ahead to activities not yet being undertaken, such as we did with GMP equalisation, and then refine this Guidance as actual experience is accumulated - the Data Matching Guidance is the clearest example yet where this approach applies. This 2025 iteration is our final Guidance before the commencement of the use of dashboards during the upcoming MoneyHelper user testing phase, a very important step on the journey as scheme and provider duties to carry out matching will have finally commenced.

Original Data Matching Guidance

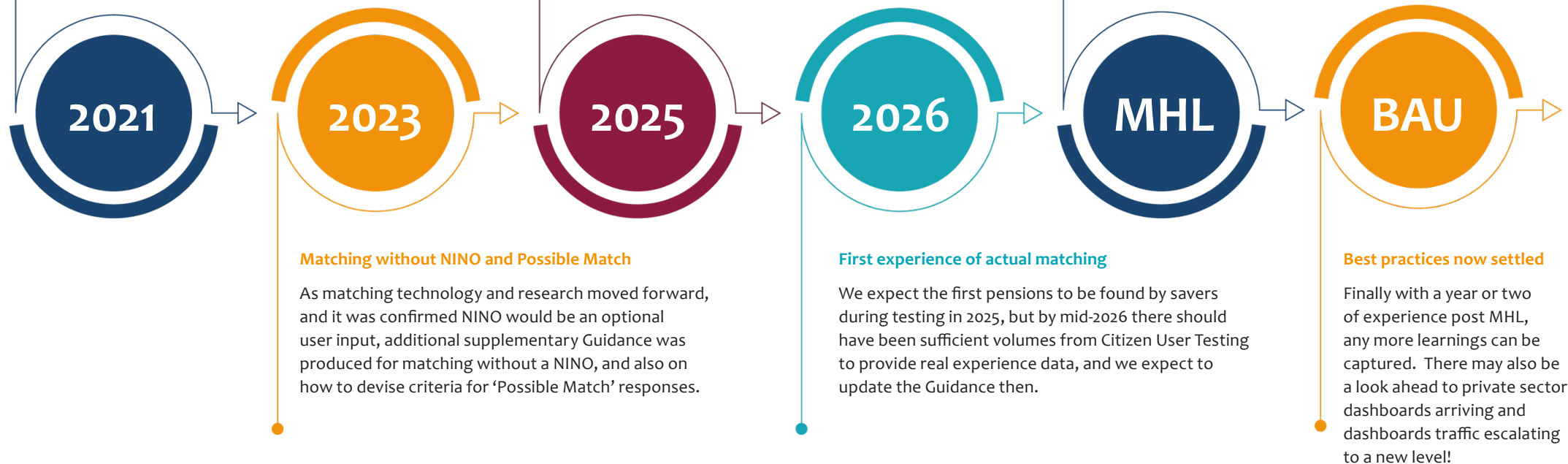
The first Data Matching Convention (DMC) Guidance was launched in late 2021. Existing matching practices were assessed, the most popular being 'Surname, DOB, NINO', and Guidance given on how matching for dashboards could build from there.

Verified fields in Find Requests confirmed

In 2024 PDP confirmed the verified fields provided from the GOV.UK One Login service to be matched against by schemes and providers. This, together with the upcoming commencement of Citizen User Testing, led to this 2025 full update of the DMC Guidance.

Experience of matching at scale

When the MoneyHelper dashboard is made fully publicly available, referred to here as 'MHL' for MoneyHelper launch, a huge spike in usage could be expected, along with extensive experience data on matching performance, which may well lead to further updates to Guidance.



3. Introduction

When a saver uses a pensions dashboard they first need to search for their pensions using the Government's new pension finder service. This service sends personal information out to every connected data provider, so it can be compared against the membership records held for every connected scheme and pension provider, to identify pension entitlements held for that saver.

The process of carrying out this comparison is referred to as 'matching' and the approaches used to determine whether there's a Match Made or a Possible Match we're referring to as 'matching conventions'. Setting matching conventions is the responsibility of schemes and providers.

Like all previous versions, this document provides Guidance to support schemes and providers based on evolving industry best practice - it doesn't prescribe any single approach to be used.

Who is this Guidance for?

This Guidance is for three main audiences:

Schemes and providers with dashboards duties

Trustees, scheme managers and pension providers ultimately have the legal duties to carry out effective matching. This Guidance focuses on matching conventions which support effective matching. However effective matching also requires other preparation, which is covered in PASA's [Connection Ready Guidance](#) and [Data Guidance](#).


Data controllers of the pension data


While these are usually the same 'entity' as those who have the duties, data controllers have a slightly different focus – they're concerned with whether data matching conventions are robust enough to protect against disclosure of data to the wrong individual. This Guidance aims to help them form a view.


Administrators and connection technology providers (such as ISPs)


Third party administrators are generally devising 'house views' to propose to the schemes they administer, and connection technology providers are developing matching 'engines' which offer different ways of carrying out comparisons administrators can choose from. This Guidance aims to help benchmark current approaches and inform how these may develop in the future.

4. What's changed in the 2025 Guidance update?

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1 Our original **DMC Guidance** first published in 2021 set out to help schemes prepare for the upcoming challenge of dashboards matching by considering how the industry currently carries out matching, and focused on matching criteria using Surname, DOB and NINO.
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2 As PDP requirements evolved, further research was undertaken by industry, and schemes actually started developing their matching criteria, PASA released **supplementary DMC Guidance** focusing on matching criteria without the use of NINO, and also for Possible Match responses.
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3 In 2024 PDP confirmed the use of the Government's new One Login service for identity verification for dashboards, and also [confirmed data items](#) which would always be provided as **verified data** in a 'Find Request', now including the One Login email address.
-  As a result of these developments, we've made some key updates – **these are very much an evolution of the previous Guidance, so schemes and providers can use this to refine what they've done to date.**
- The updates we've made focus on three principles:**
- **Emphasis on unique identifiers, not just NINO:** With the confirmation the One Login email address will always be provided there's now a verified unique identifier which will always be available to match against, to join NINO which we hope will be entered by most savers. This new Guidance therefore considers the role of unique identifiers in general in matching criteria, not just limited to NINO, particularly for schemes who engage with deferred members through personal email addresses.
 - **Certainty of making a 'Match Made':** Approaches to matching have developed and a general view as to what provides an acceptable level of certainty for a Match Made has become more widely established. We refer to this in our updated Guidance, to help data controllers form a view in the context of their specific circumstances.
 - **The need to target 'Possible Match' responses:** These are a key component of the Regulations and PDP Standards aimed at providing a means of re-connecting savers with pensions, despite the fact the data held for these savers can be out of date, or imperfectly captured at source. However, it's essential 'Possible Match' responses are well targeted, otherwise the dashboards ecosystem will be flooded with 'false responses', which would be bad for saver experience and administrator workload.

PASA's DMC Guidance is intended to help schemes and providers make decisions on initial matching criteria, rather than instructing schemes how they should match.

When the Citizen User Testing phase for the Government's MoneyHelper dashboard commences, real Find Requests will start to be received, matching will begin, and we will start learning from actual experience.

5. Data provided in Find Requests

Schemes and providers must decide which data elements they wish to compare against the pension records they hold. Their first step should be to fully understand what data elements will be passed to all schemes in the Find Request. This is known as the ‘find data’ described in the PDP Data Standards (PDP DS).

The latest version of the PDP DS is available on [the PDP website](#). The key fields shown below are taken from version 2.0 published 13/03/2025. **Highlighted data items in bold in the table below are referred to as ‘unique’ data items, because they would normally be expected to be unique to that user (although it should also be noted there could be exceptions to this).**

Reference	Data element	Description
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Core ‘uneditable’ verified data items - will always be in a Find Request

1.001	first name/given name/forename	First name/given name/forename of the user
1.003	surname	Surname of the user
1.005	date of birth	Date of birth of the user
1.023	email	Email address verified by One Login

Additional ‘uneditable’ data items - that may be provided in a Find Request

1.014 - 1.021	address and postcode	Address of the user which has been confirmed to be associated with the user during IDV
1.027	mobile number	Mobile phone number verified by One Login

Additional data item that may be entered by the saver (not verified)

1.007	NINO	NINO of the user
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Alternative data items which could be entered by the saver (not verified)

1.009	alternate first name/given name/forename	Any alternate first name/given name/forename of the user
1.011	alternate surname	Any alternate surname of the user
1.025	alternate email	Alternative email address of the user
1.029	alternate phone number	Alternative phone number of the user
1.014 - 1.021	alternative addresses	Alternative addresses (such as previous)

Core data provided to the Find Request from One Login

Some of the data items in the Find Request are obtained directly from the One Login account and cannot be edited by the saver when they use the Pension Finder service (any change to personal details would need to be updated through One Login). This will always include the first four attributes in the table opposite, which will all have been verified as part of the identity verification process, including an email address currently associated with the One Login account, and is hence unique to the ‘dashboards user’.

Mobile number may also be included in this way if it was verified during the identity verification process.

In many cases a postal address will also be provided where it’s been confirmed during identity verification that the saver has an association with the address they provide to the service. The PDP Data Standards use a specific code ‘O’ = ‘other’ to capture this address type, as covered in more detail [here](#).

Additional data entered by the saver

The saver will be given the opportunity to enter their NINO as part of the Pension Finder service from the outset of the Citizen User Testing phase. They then have the opportunity to enter some or all of the additional data items, which are all alternative versions of other data items. Alternative data items will be introduced later in the Citizen User Testing phase.

If you’re using alternative data items in matching criteria it’s important to make sure sufficient verified data items are used as well – for example, a match on NINO alone would clearly be unwise as this is entered by the saver.

Use of postal address fields in matching

Many connection technology providers will only offer postcode as a data element to use in matching rather than other lines of the address, due to the inherent differences in how address data is stored in scheme records.

6. Core Guidance – ‘Match Made’ criteria

A matching criteria for which a positive outcome leads to a ‘Match Made’ response, and hence the release of View Data to the saver, we will refer to this as a ‘**Match Made**’ criteria.

The two key principles behind assessing a Match Made are:

- to all but eliminate the risk of the match being incorrect, and
- to maximise the chance a scheme member will be matched and find their pension first time on dashboards, without having to follow up a ‘Possible Match’.

PASA’s core Guidance on how to address these two key principles when choosing matching criteria is as follows.



All but eliminating the risks of an incorrect match: There needs to be a **negligible risk of an incorrect match** for any defined Match Made criteria.

PASA’s original Guidance highlighted ‘Surname, DOB, NINO’ is broadly accepted to achieve this. However now we know NINO won’t be a verified data item, and will not always be provided by the saver, we have extended our core Guidance:

1

	Unique data items	Other verified data items
Option 1 is to include: - at least one of the ‘unique’ data items - at least two ‘verified’ data items - at least three data items in total	One or more from: Verified Email Verified Mobile Entered NINO	Add more to reach three in total: Surname, Date of Birth, Forename, Postcode
Option 2: If not using a ‘unique’ data item, include all four verified data items	None	All four of: Surname, Date of Birth, Forename and Postcode



Maximise the number of members who will find their pension: Testing **more than one Match Made criteria** may result in significant improvements in ‘member coverage’ if some personal details held on administration records are out of date, or incorrectly held, or if savers don’t choose to enter a NINO when searching.

For example, two approaches for choosing additional criteria in addition to ‘Surname, DOB, NINO’ are:

2

Additional criteria to test	Example	Extra matches achieved
Use another unique ID (email or mobile) in place of NINO	Surname, DOB, Email	Members with email address held which matches the One Login verified email
Use another verified data item in place of either Surname or DOB	Forename, DOB, NINO	Members who have changed surname since their administration record was last updated

6. Core Guidance – ‘Match Made’ criteria

The risk of an incorrect match

No matching criteria is perfect – for example there’s a theoretical risk a saver who is a twin could inadvertently input an incorrect NINO which matches the record of someone who shared their surname and date of birth. Another example would be where an administrator had mistyped an email address constructed like ‘johnsmith1@gmail.com’ which happened to match the verified email address of a different John Smith.

Any of the suggestions on the previous page could be strengthened by adding further data items, or by not using those where theoretical risks are higher. However, given the need to balance the risks with the duties to carry out successful matching, we’d propose they’re all reasonable approaches.

Status of Administrator ‘house views’

Where administrators are connecting multiple schemes to dashboards, which also includes AVC providers connecting books of scheme AVCs, there’s an efficiency for them to have ‘house views’ on how to carry out matching which they will put to their clients. Achieving consistency in matching has clear benefits operationally, such as when investigating ‘Possible Match’ responses.

The duties to agree matching criteria however remain with the trustees, scheme managers and providers, who should seek comfort any proposed criteria have been tested for effectiveness on their data, such as by following the approaches set out in PASA’s Connection Readiness Guidance, and a process is in place to monitor any changes as house views evolve during the testing phase.

Where a scheme has multiple administrators connecting its pensions, then this comfort should be sought separately for each one, noting the matching criteria may differ.

Different ways of comparing data items

The default way of carrying out a comparison of data items when testing matching criteria is simply to seek an exact match between those data items. Your ISP may also offer some standard approaches for ‘normalising’ data items before comparison, such as removing blank spaces in the text, or accented characters held in names, to prevent matches from failing unnecessarily. PDP has also provided [Guidance](#) on the special characters which can be returned by One Login.

There are other ways of comparing specific data items which may be offered, for example to have the option to compare NINO just on the first 8 characters, or limiting the comparison of a mobile number to just the final 10 digits. Allowing a comparison just on initial rather than forename is another option, although this may be more used for Possible Match criteria.

7. Core Guidance – ‘Possible Match’ criteria

We refer to matching criteria for which a positive outcome leads to a ‘Possible Match’ response, which does not release any View Data to the saver, but instead offers contact details for them to follow up with the administrator, as a ‘Possible Match’ criteria.

The two key principles behind a ‘Possible Match’ criteria are to minimise the number of incorrect responses provided, but also to minimise the number of members who will not be able to find their pension at all on dashboards, which would be a failure of dashboards for the individual.

PASA’s core Guidance on how to address these two key principles in the choice of matching criteria for Possible Match responses is as follows.



Minimise the number of incorrect responses: a Possible Match criteria may produce incorrect responses, which will clog up dashboards for savers and waste time for administrators. It’s vitally important each criteria is **sufficiently ‘focused’** to not make too many of these.

Three suggested approaches to achieving this are shown below:

Focused?	Approach to Possible Match criteria	Extent of incorrect matches
✓	Use a criteria comprising three ‘uneditable’, but not unique, data items (such as forename, surname, DOB)	May respond to incorrect members, so don’t use too many of these criteria
✓	Use a criteria which includes a verified unique data item (Email or Mobile)	Unlikely to respond to more than one incorrect member
✓	Re-use Match Made criteria but with ‘fuzzy’ comparisons used for one or more data items	Will limit incorrect matches as all data items are still ‘in play’

Another approach is to use user-entered ‘alternative value’ data items in Possible Match criteria, but being cautious to ensure there are sufficient verified data items within the criteria.



Minimise the number of members who will not be able to find a pension at all: Testing a range of different Possible Match criteria will enable schemes to minimise this outcome, by **increasing the ‘member coverage’** to still pick up members with unresolved data problems.

The choice of tests to be carried out could be informed by known data issues on a specific scheme, or (for schemes administered by a third-party administrator) to adopt the administrator’s ‘house view’, which has the added advantage of the administrator being able to adopt a consistent approach across clients to managing possible match resolution.

7. Core Guidance – ‘Possible Match’ criteria

Importance of Possible Match responses

The purpose of a Possible Match response is to enable a positive saver experience in the event a confident, but not definite, match is made between a Find Request and scheme records. It's important to note identifying and, once contacted by the saver, seeking to resolve a Possible Match, is a requirement of the legislation, and is clearly set out in TPR's Guidance on Pensions Dashboards.

Possible Match resolution also gives schemes and providers the opportunity to improve their data as a result of savers engaging through dashboards, whether the saver 'self corrects' data on a scheme portal they already have access to, or the administrator corrects it themselves.

Comparing data items using ‘fuzzy’ techniques

Some ISPs will support a comparison of data items which picks up where there are small differences which could be due to a 'typo', for example a mistyped NINO or date of birth. These can be common reasons for matches to fail, so it may be helpful to incorporate them into Possible Match criteria, or even into 'Match Made' criteria with adequate comfort from other Find Request data items.

For example, if a NINO was mistyped either in scheme records or when entered by the saver, then a criteria of Fuzzy(NINO), Surname, DOB would pick this up, which is much more focused than a criteria relying on just Surname and DOB, which could match any Find Request sharing those two details.

The detail behind any supported 'fuzzy' techniques, and the circumstances they can be applied, would need to be discussed with your Administrator or ISP.

Monitoring and delegation to administrators

As a Possible Match response does not result in the release of pensions data to the saver automatically, trustees, scheme managers and providers may be more willing to delegate the ongoing refinement of these approaches to their administrators' 'house views', subject to adhering to the key principles, and providing appropriate reporting on matching performance.

Ongoing administrator reporting which covers the Possible Match responses, including how many were resolved to a 'No Match', and overall match rates being achieved compared to expectations, should give comfort appropriate refinements are being made over time.

8. 'Possible Match' resolution processes

The key stages of the Possible Match resolution process (as currently envisaged, prior to the commencement of live Citizen User Testing in summer 2025) are shown below:



The saver reviews the limited information on the pensions found and **decides whether to contact the provider** (they have 30 days to do this). When following up they can provide the Case Reference, or in theory it could be added to the contact URL.

Generic 'landing pages', or other messaging, may encourage the saver to **resolve the Possible Match through self-service options** such as providing more data (like NINO) to the pension finder service, or correcting data on a scheme member portal.

The saver makes contact and the **Administrator establishes the identity** of the saver. This process will most likely be based on existing BAU administration processes, but taking account of the context of why the saver was directed to contact them.

The Administrator works with the saver to **assess the Possible Match**:

- Locating the case using the Possible Match Case Reference
- Noting the Possible Match criteria which led to the response
- Comparing the find data and the admin platform data

They then determine **whether or not this is a 'False Response'** – it is important to remember the saver has been directed to the Administrator because of the dashboard response, rather than seeking them out based on their own information, so a 'No Match' outcome may be more likely than a 'Match Made'.

The Administrator **applies the outcome of the Possible Match Assessment**.

If it's a 'No Match' then update the case in the Dashboards Central Digital Architecture to be a 'No Match' (see next page).

If it's a 'Match Made' then apply any updates to the member's data and either:

- Inform the member the match should be automatically upgraded and how long this will take (see next page)
- Manually upgrade the case to a Match Made

8. 'Possible Match' resolution processes

Information provided to support Possible Match resolution (summarised from PDP Data Standards 2.0):

Reference	Data element	Description
Data provided to the saver about the pension that <i>may</i> be theirs		
2.007	Pension Provider or Scheme Name	Current name of the scheme or provider
2.008/9	Additional Pension Provider or Scheme Name	Other name that a member might recognise
2.010	Pension Type	Type of pension benefit (e.g. DB / DC)
Data provided to the saver to support resolution		
2.101	Administrator Name	Name of the current administrator
2.1xx	Administrator Contact Details - URL, Email, Phone, Postal Address	Contact details (at least one set must be provided) plus a contact preference
2.002	Possible Match Case Reference (optional)	Reference for the administrator to identify the case

Suppression of repeated 'No Matches'

Savers and administrators are protected against having repeated Possible Match responses generated if the outcome was a 'No Match'.

The [PDP Technical Standards](#) (current version 2.0 published 13 March 2025) define how schemes and providers should handle repeated matches for the same 'Citizen User', being a saver with a OneLogin account who is using the pension finder service.

If the conclusion of a Possible Match resolution process is the saver is not a member of the scheme, then the result must be recorded against an identifier for the Citizen User, and any subsequent Possible Match response is suppressed.

Automatic upgrade to Match Made

Some connection technology providers may offer the capability to re-apply matching criteria when an unresolved Possible Match is present, but the administration platform data used to assess the match has subsequently been updated, potentially resulting in an upgrade to a Match Made.

This would allow members who are already engaged with their scheme or provider to use existing online access to self-serve a solution to resolve a Possible Match response provided, by updating the personal details held by the scheme.

Continual improvement

Possible match resolution is an entirely new process for the industry to implement, even though the key components of the process, such as identity verification, all exist in other forms already.

The PASA Dashboards Working Group will be monitoring the experience of administrators as Possible Match follow ups start to be received. It's likely administrators could be providing more Possible Match responses than Match Made responses, so there should be sufficient volumes to inform process improvement, even during the Citizen User Testing phase. We'll then update this Guidance as best practice approaches emerge.

9. Monitoring matching during Testing Phase

MaPS has defined a Citizen User Testing Phase which is designed to test the end-to-end Pensions Dashboard user journey. One aspect which will be tested during this phase is matching. Even though volumes of usage are expected to be in the low tens of thousands, there should still be a lot of information schemes and providers can gather during this phase, enabling them to make refinements to their matching approach ahead of the full public launch of the MoneyHelper dashboard.

→ Schemes and providers should **monitor their overall matching responses**:

- Numbers of ‘Match Made’ responses
- Numbers of ‘Possible Match’ responses

If their connection technology provider supports it, they could also ask for benchmarking data to see how their scheme compares with similar schemes using the same connection provider – similar to the analysis TPR has stated they will be carrying out across the whole ecosystem (see right panel).

→ Schemes and providers should **monitor the matching criteria which are leading to responses**, which will provide useful insight into making refinements to criteria, including:

- Insight into saver behaviour in supplying NINO and other optional inputs when searching for pensions
- Identifying redundant matching criteria, which don’t result in additional matches to those achieved by other matching criteria
- Identifying possible matching criteria which are not focused enough and lead to too many ‘No Match’ outcomes.

→ Schemes and providers should **monitor their Possible Match outcomes**:

- Number with no response from the saver, hence 30 day timeout
- Number resolved to be ‘No Match’
- Number upgraded to ‘Match Made’

This data can be used to track the effectiveness of Possible Match criteria, particularly how well focused they are.

For example, an indicator of how well focused a set of Possible Match criteria are could be as follows:

Possible Match
Overall Level of Focus

=

MatchMade + Allowance for NoFollowUp

(MatchMade + NoMatch + Allowance for NoFollowUp)

The unknown is how to make an allowance for Possible Match responses which savers don’t follow up and hence time out after 30 days, as we don’t know what the outcome would have been. Understanding more about saver behaviour through testing should help.

What does TPR’s Compliance and Enforcement policy say about matching?

TPR published its Compliance and Enforcement policy for Pensions Dashboards in September 2024. Matching is identified as a Key Risk Area they will focus on:

“Once connected, schemes will need to find savers and return data as expected. It is critical that schemes connect the right pensions to the right saver. We will take an interest where a scheme is failing to find a pension for a saver when they should (failing to return a match made or a possible match), and when a scheme returns data to the wrong saver.”

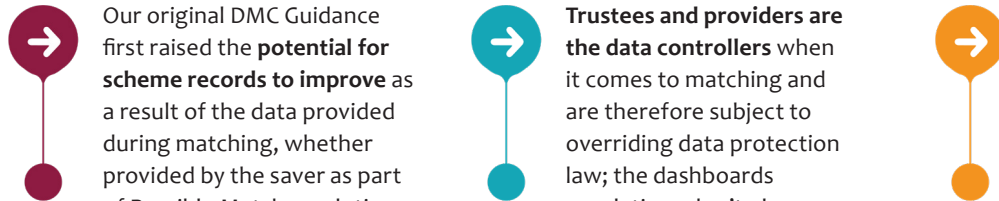
How will regulators monitor matching compliance?

It is expected the regulators (TPR and FCA) will take similar approaches to monitoring matching compliance. TPR’s Compliance and Enforcement policy gives example scenarios covering matching, and also explains how they will monitor compliance:

“We will receive regular data from the dashboards system run by MaPS. This will include data captured by the system itself (for example the connection status of schemes), data sent through dashboard services to the system, and data sent by schemes to the system (as per reporting standards), which will flow through to us.”

“In some cases, the data will flag where there is a potential risk for us to explore further (for example if a scheme does not return the number of matches we might expect from a scheme of that size).”

10. Data improvement resulting from matching

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- Our original DMC Guidance first raised the **potential for scheme records to improve** as a result of the data provided during matching, whether provided by the saver as part of Possible Match resolution, or just as part of the 'Find Request' data itself.
 - Trustees and providers are the data controllers** when it comes to matching and are therefore subject to overriding data protection law; the dashboards regulations don't place specific constraints on how controllers use the data.
 - In 2024 PDP confirmed the data items which would always be provided as verified data in a Find Request, and which other ones may be provided as verified data. This means **Find Requests will expose incorrect data** held in scheme records.

How can matching help improve data?

- **If the Match Made is achieved following a Possible Match resolution** process then the individual will have gone through a separate identity verification process and their agreement to update records based on Find Request data, or anything else, can be obtained as if this is a normal BAU member contact scenario.
- **If the Match Made is achieved automatically without the member's involvement**, as the overwhelming majority will be, then the data controller will be able to see if there are discrepancies between the verified data items and the scheme records – by definition these won't have been sufficient to prevent the Match Made.
- It would be **undesirable** for schemes to have to **drive all these cases to be a Possible Match** instead, simply because data discrepancies are identified. This would be a poor dashboards experience for the saver who may never follow up the possible match, and if they do then it's additional work for the administrator.

Data items which may be found to be incorrect

We now know verified Forename, Surname, Date of Birth, and the verified Email used in the One Login account, will always be provided. A verified mobile number may be provided, and a postal address will usually be provided which is confirmed to be associated with the member.

More details on the Identity Service, and the data being verified for use in Find Requests, can be found on the [PDP website](#).

10. Data improvement resulting from matching

Below are three scenarios to consider regarding data improvement following an 'automatic Match Made' – in all cases we would recommend data controllers seek legal advice on their proposed actions, and then discuss the feasibility with their administrators or ISPs:

- **Correcting a data item using verified Find Request data:** For example, the Match Made was achieved on 'NINO, Surname, Forename' but Date of Birth is incorrect. This seems to be clear information the data controller should act upon, following their administration processes, which may still include seeking proof from the member.
- **Correcting a data item using unverified / user-entered Find Request data:** For example, the Match Made was achieved on 'Email, Surname, Date of Birth' but NINO differs. As NINO is only a user-entered field, either could be correct. The data controller may however wish to record the discrepancy and seek to validate the NINO at next contact.
- **Identifying a data item not held on scheme records:** For example, the Match Made was achieved on 'NINO, Surname, Date of Birth'. No email address is held on scheme records, but a verified one has been provided for matching purposes – is it sensible to retain that email to make future matching more resilient to data changes, or maybe to seek permission to use it for scheme communications?

Data protection law

The data protection accuracy principle expects:

- You should take all reasonable steps to ensure the personal data you hold is not incorrect or misleading as to any matter of fact.
- You may need to keep the personal data updated, although this will depend on what you are using it for.
- If you discover personal data is incorrect or misleading, you must take reasonable steps to correct or erase it as soon as possible.
- You must carefully consider any challenges to the accuracy of personal data.

What does the ICO say?

From the DWP 2022 dashboards consultation response:

- “The ICO has echoed our view that ‘it is vital schemes are doing what they can to improve the accuracy of the data which will be integral to the success of pensions dashboards. The accuracy principle under Article 5(1)(d) of the UK GDPR requires that organisations ensure data remains accurate and up to date.’ ”

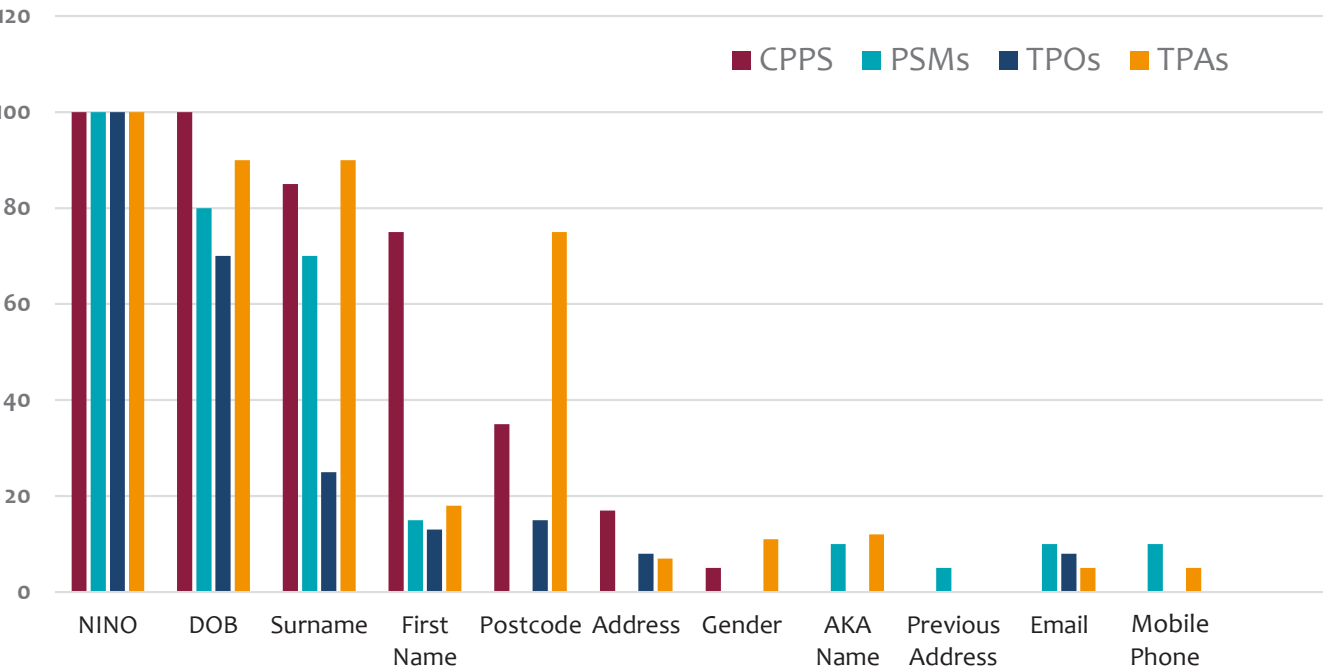


Pensions Dashboards Working Group

Annex
July 2025

Survey on existing practices (from original Guidance)

Fields used for identity matching (by organisation type)



Note: Today, many schemes also ask the member for their home postal address, but this may not (and often doesn't) match the address held on the scheme's records, although the individual's previous address may match what's held.

In this graph of responses, note the lower prevalence of First Name. Key to respondent types:

- CPPs** Commercial Pension Providers (14 responses)
- PSMs** Pension Schemes and Master trusts (11 responses)
- TPAs** Third party Pension Administrators (10 responses)
- TPOs** Technology Providers/bodies and Others (10 responses)

This table reflects responses to the PDP Call for Input on data standards which asked:

“

Which data items do you anticipate could be used to definitively match individuals to their pension entitlements?