PASA Dashboards Working Group

Dashboards Toolkit: Use of Warnings and Unavailable Codes

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PASA

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Dashboards Toolkit: Use of Warnings and Unavailable Codes

1. Introduction and Purpose

The PDP data standards are flexible to allow trustees, scheme managers and providers to apply judgement in deciding on the data to provide. This is important as it allows for the variations in types of schemes we have and their differing benefit structures. However, this has the potential to result in the standards being applied differently where this isn't necessary, leading to an inconsistent saver experience as well as challenges in interpretation for the Money Helper Pensions Dashboard (MHPD) and private sector dashboard operators.

One of the areas where there's the potential for variation is in the use of 'Warning' and 'Unavailable' codes when an administrator or provider can't provide complete and accurate value data immediately.

This toolkit content is designed to help achieve consistency where possible. The content has been drafted with input from the Pensions Dashboard Programme (PDP) and the Money and Pensions Service (MaPS). Trustees, scheme managers and providers should still satisfy themselves their return is compliant with the regulations and standards. The toolkit content will evolve in response to savers' reactions to pensions dashboards including through live testing. Any changes to the content will be documented using a change log approach broadly similar to that used for the PDP standards.

2. General Principles

This toolkit content was created on the basis data provided to a dashboard is fit for purpose. However, It's recognised circumstances may arise where value data can't be immediately updated to reflect a change in a saver's circumstances. This is irrespective of whether trustees, scheme managers and providers are using stored or on demand calculations. Therefore the use of a Warning code or removing Value Data and applying an Unavailable code instead may be appropriate.

Where dashboard Value Data won't be immediately updated, trustees, scheme managers and providers may wish to consider including a paragraph in existing communications issued to savers to advise them it may take a while before a dashboard reflects the changes in their benefits/circumstances.

This toolkit content addresses some of the more complex or non-standard dashboard scenarios. However, it doesn't highlight some of the specific considerations which apply to cash balance schemes. These will be covered in separate toolkit content to be issued later in 2025.

3. Approach to use where Value Data isn't immediately available following receipt of a view request

ERI/Accrued unavailable (data standards 2.301/401) codes DB and DCC and 3/10-day SLA

The DB and DCC codes are special Unavailable codes designed to be used in a business as usual (BAU) situation where Value Data isn't available:

- from a statement in the last 13 months, or
- a calculation performed for the saver within the last 12 months and the administrator has decided in advance they will calculate values under the 3 (DC) or 10 (DB & Hybrid) day regulatory timescale for Value Data if a View request is received

However, if there's a specific known reason why a calculation can't be provided at this time, then a different Unavailability code should be set from the fixed list available.

For example, a remediation project could be in progress which will materially impact the values. In which case the **TRN (**Transaction outstanding which affects the value) code should be provided.

Similarly, if a DB or DCC code has already been given in a View response, but when trying to calculate the pension values the administrator then identifies a specific reason why a calculation can't be provided at this time, then the Unavailable code should be updated to reflect this specific reason.

For example, if a response is outstanding from a third-party provider, such as an actuary or AVC provider, the code should be updated to **ANO (**Benefits cannot currently be provided as information is required from a third party). This updated code would be displayed to the saver if they make a subsequent View request.

If none of the other specific Unavailable codes apply, then the administrator must complete the case within the 3/10-day regulatory timescale. This is a regulatory requirement and failure to do so may result in a breach.

Other Unavailable codes in the Data Standards 2.301 & 2.401 (ERI and accrued unavailable fields)

The other Unavailable codes can be used allow for a number of specific scenarios detailed in the Data Standards are:

- Calculations prevented from being completed because information required from a third party hasn't been provided (code ANO), an action or decision needed by the saver is outstanding (MEM), or there's an outstanding transaction which needs to complete (TRN). This may form part of the regular update of Value Data or be in response to a view request as outlined above

- The DB code stating an Estimated Retirement Income (ERI) won't be provided for a deferred (inactive) DB or Cash Balance (CB) saver. This is expected to be widely used as the regulations don't require an ERI to be provided in these circumstances
- New members (NEW) (these may be individual new joiners or as a result of a bulk transfer-in). Note there are mandatory timescales defined in the regulations for provision of Value Data for new savers, and these should be tracked and adhered to
- Special codes in respect of schemes in PPF assessment (PPF) or those winding up (WU)
- Specific Unavailable codes relating only to ERI (not Accrued Value (AV)) in respect of DC benefits, small DC pots (see below - DCHA), and for savers within two years of their benefit payable date or have passed this date (DCHP)

Small pension code

For small DC pensions, the Data Standards mirror the provisions in AS TM1, i.e. there's no requirement to provide the pension equivalent of either the AV or the ERI if the pension is less than £120 p.a. This isn't an Unavailable code but is achieved by setting the special 'SML' code defined in the Data Standards in place of returning an amount. However, to decide if the code should be used, there will be a need to calculate the pension, so it's good practice to include the pension rather than using this code.

Using the Unavailable codes for AVC benefits

Where the AV or ERI in respect of a saver's AVC benefit isn't able to be provided, it's recommended this should be catered for by returning an appropriate code in the ERI Unavailable (2.301) and/or Accrued Unavailable fields (2.401), as it would for any other benefit, rather than using an AVC warning code attached to a different benefit (this is also covered in the Warnings table below).

The responsibility for setting the Unavailable fields differs depending on the approach taken to connect AVCs:

- Where an AVC is being connected using a Multiple Source approach, (where an AVC provider is connecting it directly to dashboards), it should be the AVC provider which provides the relevant Unavailable code, although trustees, scheme managers and other providers have an interest in understanding when and how this will be done
- Where an AVC is being connected using a Single Source approach, then the Single Source provider will be providing the Unavailable Code in agreement with the trustees, scheme manager or provider
- Regardless of the approach used, an AVC reconciliation should be carried out by the scheme's administrator (as covered in our AVC content in the PASA Dashboards Toolkit). This ensures trustees, scheme managers and providers have a clear view of which scheme members have AVCs. Which is a precursor to even knowing if an Unavailable code is needed

For both Single Source and Multiple Source approaches, the standard considerations set out in the sections above apply in choosing the correct Unavailable code where they're relevant for a DC benefit, including:

- There may be instances where a saver isn't entitled to ERI data for their AVC. For example, if they're within 2 years of their benefit payable date or older and the DCHP code is to be used
- If the only reason for the benefit being unavailable is the approach will be to calculate it within the 3/10 working day regulatory timescale, then the DCC code would be used to show this
- Other codes may be appropriate, such as TRN for an outstanding transaction, or NEW in the case of a new member

For Single Source approaches only, the Unavailable code could be set to ANO by the scheme administrator if they're waiting for the AVC provider (as a third party) to provide the necessary accrued and ERI data for the saver.

For example, as part of the annual provision of a data file to the scheme covering all of their AVC payers with the provider.

Use of warning codes

The table, below applies to data standards 2.314 (ERI warning) and 2.414 (Accrued warning)

Code	AVC
Situations where the code can/should be used	The code will be used to display wording stating the benefit illustrated doesn't include all the pension provider's/scheme's AVCs
Good practice use of the code ERI	This warning code is available in the Data Standards specifically for use in Single Source connection approaches. ***However we haven't been able to identify any scenarios where we would recommend this warning code is used.*** Our reasons are as follows: • This warning code would be attached to a benefit being returned to dashboards, usually a DB benefit, but this DB benefit won't have the AVC benefit included within it, so the warning code is likely to be misleading • When the AVC benefit is eventually provided it'll appear as a separate accrued and ERI value (alongside the main scheme benefit) • The reasons why the AVC benefit hasn't been provided are as important to capture as with any other benefit, not least for demonstrating compliance with regulations, so we recommend the appropriate Unavailable code is set instead
Good practice use of the code AV	Further guidance on choosing the appropriate Unavailable code for a missing AVC benefit is given earlier on Page 3 of this document

Code	CUR
Situations where the code can/should be used	The code will be used to display wording to advise the saver their benefits held in a particular scheme is in a non-sterling currency, and they should contact the scheme's administrator if they require more accurate value information or have any questions
Good practice use of the code ERI	There will be instances where benefits are held in a non-sterling currency and therefore values are likely to fluctuate in response to changes in exchange rates. This code should only be used in these circumstances to warn the saver the benefit is based on exchange rates at the Benefit Illustration Date
Good practice use of the code AV	As for ERI

Code	DEF
Situations where the code can/should be used	The dashboard will explain the saver's ERI or AV was calculated when the user was an active scheme member
Good practice use of the code ERI	There's no requirement under the regulations to update Value Data when a scheme member moves from active to deferred status. However, not doing so carries the risk the saver will expect to receive a higher level of pension from this scheme than they're entitled to, because the active ERI value allows for future contributions (DC) and future service (DB). Where a scheme member moves from active to deferred status, schemes should make the DEF code available to pensions dashboards as soon as possible and until they're able to apply an update to, or remove, each of the ERI values. For DB benefit types where a separate ERI isn't going to be provided for deferred members, we suggest the ERI is removed at the point when the record is made inactive and replaced by the relevant Unavailable code
Good practice use of the code AV	As the AV will still be correct, this code doesn't apply to the AV and shouldn't be used

Code	FAS
Situations where the code can/should be used	A note will be added to explain to the saver their benefits will be supplemented by direct payments by the Financial Assistance Scheme (FAS)
Good practice use of the code ERI	The use of this code will only be required in limited circumstances where the scheme in question qualified for the FAS and should always be used where appropriate
Good practice use of the code AV	As for ERI

Code	PEO
Situations where the code can/should be used	To explain the saver's scheme benefits may be subject to change as their record shows a pension earmarking order is held. The saver will be directed to the scheme administrator if they require further information
Good practice use of the code ERI	As a Pensions Earmarking Order (PEO) isn't applied until a saver takes their benefits, this code should be applied where a saver either already has a pension earmarking order or, if possible, where there's a case open which could result in the application of an earmarking order
Good practice use of the code AV	As for ERI

Code	PNR – for the purposes of this guidance this code is considered to apply to savers who have passed their benefits payable date
Situations where the code can/should be used	This code indicates to the saver values have been calculated to be those payable at the (now historic) Benefit Payable Date, as they have passed this date for that benefit
Good practice use of the code ERI	**Active DB scheme savers** - The PASA Value Data Guidance outlines several options for savers who are (or will be) effectively 'late retirements,' and each scheme will need to review whether it's appropriate to provide the PNR code. As a pre-requisite for this review, each scheme should agree the Benefit Payable Date, this may require a trustee decision. One option for those past Benefit Payable Date is to provide the ERI at this date. This could result in the ERI figure being understated. In this scenario the ERI figure should be accompanied by the PNR code. **DC savers** – it's expected the DCHP Unavailable code will be used in the ERI Unavailable (2.301) field, and no ERI figure will be provided. This may result in savers who have both DB and DC benefits within one trust or arrangement seeing Value Data for the DB benefit but an unavailable code for the DC benefit
Good practice use of the code AV	**DB savers** - For DB savers the AV will depend on whether they're active or deferred status. For deferred savers, the value provided is likely to be at the (historic) Benefit Payable Date unless late retirement increases are being applied. Further information on whether to apply late retirement increases is contained in the PASA Value Data Guidance. If late retirement increases are applied, the PNR code shouldn't be used as the value provided will be 'as at the benefit illustration date'. The principles outlined for ERI for DB active savers will also apply for AV. **DC savers** - the AV will be at the benefit illustration date, so no warning code will be required. This is important as DC benefits typically can't be backdated so it would potentially be misleading to the saver to suggest benefits are payable from a date in the past

Code	PSO
Situations where the code can/should be used	To explain the saver's benefits may be subject to change as their record shows a sharing/splitting order is held on their record. They will be directed to the scheme administrator if they require further information
Good practice use of the code ERI	As the dashboard is likely to drive savers to contact the administrator, this warning code should only be used where there's a possibility the ERI provided is subject to change. This is likely to be the case in two scenarios as follows: • The administrator is using stored Value Data, a pension sharing order has been applied since the Value Data was last updated and it won't be updated to reflect the pension sharing order until the next 12/13-month update • If there's a pension sharing order case open which could result in the Value Data available on the dashboard being subject to change if it's implemented. Administrators will decide at which point in the process the code should be applied It should **NOT** be used where the value information displayed is correct, as this would result in unnecessary queries being raised with the administrator
Good practice use of the code AV	As for ERI

Code	SCP
Situations where the code can/should be used	This code may be used where the pension provider/scheme has agreed to pay some or all their member's annual allowance charge, but the amount hasn't yet been determined/agreed. For example, where a conversion is needed between the charge amount and the equivalent annual pension to be deducted. Therefore, the actual pension will be lower than the estimate provided
Good practice use of the code ERI	As the dashboard is likely to drive savers to contact the administrator, this warning code should only be used where there's a possibility the ERI provided is subject to change. This is likely to be the case in two scenarios as follows: • The administrator is using stored Value Data; a scheme pays has been applied since it was last updated and the Value Data won't be updated to reflect the scheme pays order until the next 12/13-month update • Where possible, if there's a scheme pays case open which could result in the Value Data available on the dashboard being subject to change should the scheme pays deduction be implemented. It's for administrators to decide at which point in the process the code should be applied It should **NOT** be used where the value information displayed is correct, as this would result in unnecessary queries being raised with the administrator, or where the provider/scheme has agreed with their member to settle some/all of their annual allowance charge liabilities, and the amount has been agreed but not yet deducted from their fund. In the latter scenario, values net of the 'scheme pays' debits should be calculated and provided within the agreed timeframes; in the meantime, the TRN code should be displayed in the ERI Unavailable (2.301) and/or Accrued Unavailable fields (2.401), to denote benefits are being calculated
Good practice use of the code AV	As for ERI

Code	TVI
Situations where the code can/should be used	This code is designed to alert the saver to the fact the benefit illustrated has a transferred-in element which may affect its value; for example, a transferred in amount hasn't been included in the benefit illustration. It's likely this will suggest the saver should contact their administrator if they need additional information
Good practice use of the code ERI	As the dashboard is likely to drive savers to contact the administrator, this warning code should only be used where there's a possibility the ERI provided is subject to change. This is likely to be the case in two scenarios as follows: • The administrator is using stored Value Data, a transfer in has been completed since it was last updated and the Value Data won't be updated to reflect the transfer in until the next 12/13-month update • Where possible, if there are one or more transfer in cases open which could result in the Value Data available on the dashboard being subject to change should the transfer in go ahead. It's for administrators to decide at which point in the process the code should be applied It should **NOT** be used where the value information displayed is correct, as this would result in unnecessary queries being raised with the administrator
Good practice use of the code AV	As for ERI

Code	UNP
Situations where the code can/should be used	This code is designed to alert the saver the benefit has an underpin which could affect how the final benefit is calculated
Good practice use of the code ERI	Knowing when to use this code is a matter of judgement for individual schemes. PASA's Value Data Guidance should be consulted when considering the approach to underpins in general. If there's an underpin but it's extremely unlikely to ever bite based on the benefit structure and past experience, then adding the warning code will create a risk of confusing the saver or leading to an expectation there will be an increase in the benefit which may then be difficult to explain if it doesn't arise. In deciding whether to include the code, actuarial input may be required, as well as consideration of what information is already available to the saver, and therefore what they may be expecting to see on a dashboard
Good practice use of the code AV	As for ERI

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