

Pensions Dashboard Programme – Data Matching Policy

Agreed:

Reviewed:

Summary

1.1 Purpose

This document records our matching criteria for pensions dashboards, confirms our chosen approach, and explains why it remains appropriate under current regulations.

1.2 Matching approach

Match type	Required elements	Follow-on action
Full Match	Surname, DOB, NINO	Create and register Pension Identifier (PeI)
Possible Match	NINO + DOB or NINO + Surname	Start possible-match flow (direct member to form for more info)
Possible Match	First name + Surname + DOB + current Postcode	As above

1.3 Record-keeping

We will retain a record of our matching policy and any updates for at least six years as per FCA rules.

1.4 Policy evolution

We may evolve our criteria over time (e.g. adding email, mobile, address verification), depending on data quality and the Pensions Administration Standards Association (PASA) guidance. Any change will be documented with rationale and date.

2. Regulatory Background

- From April 2025, relevant pension funds must be connected to the MaPS/DWP dashboards architecture, with full compliance by **31 October 2026**.
- All providers must process incoming "find requests" using matching criteria, and respond according.
- PASA's new 2025 guidance provides a detailed roadmap for matching and improving data quality.

3. Roles & Responsibilities

- **Assistant Director – Pensions Administration** maintains overall responsibility for regulatory compliance.
- **Pensions Dashboard working group** will:
 - Draft and update the matching policy
 - Archive version history
 - Lead data quality improvements
 - Manage possible-match resolution flows

4. Full Match Policy

- Matches must include **surname**, **date of birth**, and **NINO**, aligning with Pensions Administration Standards Association (PASA) and industry standard.
- On a match made, our ISP provider (Civica) will create and register a Pension Identifier (PeI) with MaPS, without sharing pension data until the user requests view access.
- If there is no match, no data is returned.

5. Possible Match Policy

- A "possible match" triggers when two core elements match (NINO+DOB or NINO+surname), or when four items match (first name, surname, DOB, postcode).
- In such cases:
 - Civica register a PeI.
 - We notify the member that they may have a pension, offering a secure method (e.g. via a link to a form) to provide additional identifiers: previous names, email, mobile, employer, payroll number, etc.
 - If no clarification is received within **30 days**, personal data is deleted and the PeI deregistered. If later confirmed, we update MaPS accordingly.

6. Future Considerations

- As PDP Data Standards evolve (Version 2.0 approved March 2025), we may incorporate verified email, mobile, or no-NINO flag fields into matching criteria pensionsdashboardsprogramme.org.uk.
- We will continue to update matching criteria and documentation as required by changes to PASA guidance, and PDP standards.
- This policy will be formally reviewed at least annually, or when provider data quality issues or user complaint volumes indicate a need.