

**London Borough of Sutton Pension Fund**

# **Pension Dashboard Programme - Data Matching Policy**

(October 2025)

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# 1. Introduction

This is the Pensions Dashboards Programme Data Matching Policy of the London Borough of Sutton Pension Fund (“the Fund”) managed by the Shared Pensions Administration Service (“the Administering Authority”).

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.

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

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.

The 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.

This Policy is published on the Fund’s website. It is formally approved by the London Borough of Sutton Pension Fund Committee in its role as the Administering Authority of the Fund. The Strategy is implemented from October 2025.

If you require any further information about anything in or related to this Policy, please contact the Fund by email at [skemployers@sutton.gov.uk](mailto:skemployers@sutton.gov.uk).

## 2. Aims and Objectives

The Funds’ 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; and
- To continually measure and monitor success against the Fund’s objectives.

## 3. Purpose of this Policy

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

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

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. Summary

In summary, our approach to data matching is captured below and the remainder of this policy discusses our decisions in more detail.

Type of Match	Required Elements	Follow on Action
<b>Full</b>	Surname, Date of Birth, NI Number	Creation of a pension identifier
<b>Partial</b>	NI Number & Date of Birth	Start partial match process
<b>Partial</b>	NI Number & Surname	Start partial match process
<b>Partial</b>	First name, Surname, Date of Birth & Postcode	Start partial match process
<b>No Match</b>	N/A	Delete Pension Identifier

## 5. Matching Process

In the pensions dashboard ecosystem “find requests” will be sent from the central Pension Finder Service (PFS) every day to all connected data providers.

Whenever an individual logs in to their pensions dashboard and makes a request to find their pensions, all schemes and providers must compare and match the user’s personal details and return their pension information for them to view. The main aim is to enable individuals to find their pensions, through schemes and providers making as many positive matches as they can.

## 6. Roles & Responsibilities

The Head of Pensions Administration for the London Borough of Sutton Pension Fund has overall responsibility for compliance with the Pensions Dashboards regulations.

The Shared Pensions Administration Service will provide the necessary resources to:

- Agree and write the matching policy;
- Document any changes to the matching policy and keep a record;
- Improve our data quality to increase confidence that we match to the right person without increasing the risk that we fail to find someone when we do hold their pension information; and
- Implement processes to manage partial matches.

## 7. Full Match Policy

We have decided to match based on three core data elements: **surname**, **date of birth** and **National Insurance Number** (“NI Number”). This is in line with the industry standard as recommended by the Pensions Administration Standards Association (“PASA”).

Once we are confident that we have found a member’s pension record using the information they provided, we have a ‘match’ and must create and register a unique identifier, also known as Pension Identifier, with the digital architecture to meet Money and Pensions Service’s (“MaPS”) technical standards. The pension identifier does not contain any pensions information but acknowledges that there is a match.

Following a successful match on the three core criteria, the individual’s accrued and estimated pension data will be returned instantly to the individual’s Dashboard.

## 8. Partial Match Policy

If an individual does not match on an NI number, they will need to match on at least date of birth and surname plus at least two other additional data items to achieve a partial match (e.g. postcode, email address or mobile phone number). For example, the NI number and DOB match, but the surname name does not match. This could happen if a member has married but failed to notify us of their new last name.

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 pension data available to the individual’s Dashboard.

Following a request for additional information, if the individual does not make contact within 30 days, we will delete their personal information and deregister the pension identifier. If a match is subsequently confirmed, we would notify MaPS that the match is now confirmed and provide the relevant pension data to the dashboard upon request.

## **9. No Match**

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 Fund or because their membership status is currently out of scope of the Pension Dashboards Programme.

## **10. Review**

This policy will be reviewed annually, and by the Pension Fund Panel every three years, or otherwise required.