



NATIONAL PENSION COMMISSION

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CIRCULAR

REF: PenCom/TECH/B&I/2026/354

DATE: 26 October 2026

TO: All Licensed Pension Fund Administrators

**SUBJECT: OBTAINING RETIREES' CONSENT FOR ENROLMENT INTO THE
PENCARE INITIATIVE DURING PROGRAMMED WITHDRAWAL
RETIREMENT BENEFIT PROCESSING**

1.0 Introduction

- 1.1 The National Pension Commission (the Commission), in collaboration with Licensed Pension Fund Operators (LPFOs), established the PenCare Initiative to improve access to quality healthcare services for eligible retirees under the Contributory Pension Scheme (CPS).
- 1.2 The Initiative seeks to facilitate healthcare coverage for eligible retirees in accordance with the eligibility criteria approved by the Commission.
- 1.3 In furtherance of the effective implementation of the PenCare Initiative and to enhance the timely enrolment of eligible retirees, the Commission has approved a standardised process for obtaining retirees' consent during retirement benefit processing.

2.0 Objective

- 2.1 The objective of this Circular is to ensure that Pension Fund Administrators (PFAs) obtain the informed consent of retirees who elect Programmed Withdrawal (PW) for possible enrolment into the PenCare Initiative at the point of retirement benefit processing.

2.2 This process is intended to:

- i. Facilitate timely identification and enrolment of eligible retirees;
- ii. Eliminate delays associated with obtaining consent after retirement benefits have been processed;
- iii. Establish a uniform industry-wide consent process; and
- iv. Improve the quality and completeness of enrolment records.

3.0 Requirement

- 3.1 Effective from the date of this Circular, every PFA shall obtain the informed consent of eligible retirees who elect Programmed Withdrawal at the time the retiree executes the Programmed Withdrawal Agreement.
- 3.2 The consent shall be obtained using the standard PenCare Consent Form (Annex 1) prescribed by the Commission.
- 3.3 The PenCare Consent Form shall be completed as a separate document and shall not form part of, or alter, the Programmed Withdrawal Agreement.
- 3.4 Execution of the Programmed Withdrawal Agreement shall not be made conditional upon the retiree consenting to participate in the PenCare Initiative.
- 3.5 A retiree's decision to decline participation in the PenCare Initiative shall not affect the processing or payment of his or her retirement benefits.

4.0 Responsibilities of Pension Fund Administrators

- 4.1 Every PFA shall:
 - i. Explain the purpose of the PenCare Initiative to retirees before requesting consent;
 - ii. Ensure that consent is obtained voluntarily without coercion or undue influence;
 - iii. Obtain the retiree's signature on the prescribed PenCare Consent Form;
 - iv. Retain the signed consent form as part of the retiree's retirement benefit records;
 - v. Maintain appropriate records of retirees who consent to, and those who decline, participation;
 - vi. Submit information on consenting retirees to the Commission in the format and frequency prescribed by the Commission; and

- vii. Ensure that all personal information collected and processed under this Circular is handled in accordance with the Nigeria Data Protection Act, 2023, the General Application and Implementation Directive (GAID), 2025 and other applicable laws or Regulations issued by the Nigeria Data Protection Commission.

5.0 Data Privacy

- 5.1 PFAs shall ensure that personal information obtained under this Circular is processed solely for the purpose of determining eligibility and facilitating enrolment into the PenCare Initiative.
- 5.2 Personal information shall not be disclosed to any third party except as authorised by the Commission or as required by law.

6.0 Record Keeping

- 6.1 PFAs shall retain all executed PenCare Consent Forms as part of the retiree's retirement benefit documentation.
- 6.2 The records shall be made available to the Commission during routine supervisory examinations or upon request.
- 6.3 The records shall be maintained as part of the retiree's benefit administration file and made available to the Commission during routine or special examinations.

7.0 Compliance

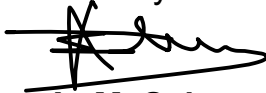
- 7.1 The Commission shall monitor compliance with the provisions of this Circular through its routine supervisory and examination activities.
- 7.2 Failure to comply with the provisions of this Circular may attract appropriate regulatory action in accordance with the Pension Reform Act 2014 and other applicable regulatory instruments.

8.0 Effective Date

8.1 This Circular takes immediate effect.

8.2 All inquiries regarding this Circular should be directed to the Head, Benefits and Insurance Department.

Thank you.

A handwritten signature in black ink, appearing to read 'A. M. Saleem', with a horizontal line drawn underneath it.

A. M. Saleem

Director, Surveillance Department