

Meeting of the Board 8 September 2022

Pensions Dashboards update

Background

1. Between 31 January and 13 March 2022, the Department for Work and Pensions (DWP) consulted on draft Pensions Dashboards Regulations.
2. The consultation proposed a staging deadline of the end of April 2024 for public service pension schemes, meaning that FPS administrators would need to be able to connect to the digital architecture by this date and be ready to provide individuals' data to them via the dashboards.
3. The SAB submitted a [robust response to the consultation](#), expressing concern over the proposed staging date given the conflicting pressures faced by employers and administrators, and the requirement to hold value data which at that point would not reflect remediable benefits. The SAB also noted the difficulty in presenting data to scheme members based on different sets of benefits with different retirement ages.
4. On 14 July 2022, the Department for Work and Pensions (DWP) published its [consultation response on the draft Pensions Dashboards Regulations 2022](#) and a [summary of the key policy changes](#).
5. The response confirms that the staging deadline for all public service schemes has been extended by five months from 30 April 2024 to 30 September 2024, and further, that the requirement to provide value data has been pushed back to 1 April 2025 at the latest and will only be earlier where a Remediable Service Statement (RSS) has been issued – paragraphs 5.35-5.36.
6. In relation to members with different tranches of benefits, the regulations will be amended to allow scheme flexibility to provide “a separate set of values for different combinations of tranches of benefits, along with a retirement date in relation to each.” – paragraph 2.39.
7. This paper considers the interaction between Annual Benefit Statements (ABS), RSS, and the new dashboard staging date.
8. The paper also provides information on further dashboard-related consultations.

ABS-RSS

9. The current statutory requirement is to provide all active members with an ABS by 31 August each year, based on pension accrual as at 31 March that year. In many cases, the ABS also shows expected pension at date of retirement.
10. Following implementation of retrospective remedy from 1 October 2023, there will be a new requirement to provide an RSS within 18 months which shows pension accrual for the remedy period under both legacy and reformed schemes.
11. [Section 29 of the PSPJOA 2022](#) deals with RSS:
 - Section 29(5) states RSS must include legacy AND reformed benefits and instructions for elections.
 - Section 29(7) requires the scheme rules to state that an RSS must be provided on or before the “relevant date”.
 - Section 29(10) confirms that the relevant date is 18 months after section 2(1) comes into force – or later at the scheme manager’s discretion.
 - Section 2(1) will come into force on 1 October 2023 = RSS to be issued by 1 April 2025.
 - Section 29(8) requires RSS for active members annually on the anniversary of the relevant date (i.e. by 1 April each year).
 - Section 29(6) sets out that HM Treasury Directions may require:
 - Specified information to be included
 - Information provided in a specified form
 - RSS provided to specified person or in a specified way
 - **RSS should be sent with or combined with a benefit information statement (RSS-ABS)**
12. Therefore, there are two conflicting timescales for providing ABS and RSS, and it would be impossible to issue an RSS for the 1 April date based on scheme membership up to 31 March in the same year.
13. In light of this, and the requirement for the FPS to connect to the pensions dashboards architecture by 30 September 2024, the proposal is for a combined ABS/RSS to be issued at the point that the first post-remedy ABS is due, by 31 August 2024. This will allow members to access their remediable value data at the first point at which they are likely to access dashboards.

Further Dashboard Consultations

DWP further consultation

14. On 28 June 2022, DWP launched a [further consultation on Pensions Dashboards](#). This further consultation supplements the consultation on the draft regulations which ran from 31 January to 13 March 2022

15. The further consultation set out two proposals. The first proposal provides clarity on the 'Dashboard Available Point' (DAP). The second proposal allows the Money and Pensions Service and the Pensions Regulator to share information about dashboards with each other.

16. The DAP is the point at which dashboards will be available to all members of the public. The consultation proposes that the DWP will decide on the DAP and then give pension schemes 90 days' notice. It is hoped that this will give schemes sufficient time to make final preparations.

17. The LGA submitted a [response to the further consultation](#) on behalf of the FPS on 19 July 2022. The response expressed broad support for the proposals, providing that schemes received enough advance notice of the expected DAP.

PDP consultation on dashboard standards and guidance

18. On 19 July 2022, the Pensions Dashboards Programme (PDP) launched [a consultation on dashboard standards and guidance](#).

19. The standards detail how pension schemes and dashboard providers operationally, technically or in practice must meet their dashboard duties. The following seven standards have been published for consultation:

- [operational standards](#)
- [security standards](#)
- [service standards](#)
- [data standards](#)
- [reporting standards](#)
- [application programming interface standards](#)
- [technical \(other\) standards](#)

20. The guidance provides further requirements which pension schemes must have regard to when complying with their dashboard duties. The following four sets of guidance have been published for consultation:

- [connection guidance](#)
- [data usage guide](#)
- [overview technical guidance](#)
- [early connection guidance](#)

21. The consultation closed on 30 August 2022.

PDP call for input on design standards

22. Additionally on 19 July 2022, the PDP launched a [call for input on the design standards](#) which also closed on 30 August 2022.

23. The design standards will provide information to dashboard providers, as well as data providers, about required layouts, content elements, messaging, and user journeys, to ensure a consistently positive experience for users, regardless of which dashboard an individual chooses. PDP are running the call for input to get feedback and thoughts on their developing ideas for Qualifying Pensions Dashboards design standards from the pensions industry and consumer groups.
24. Following this call for input, a consultation on the final design standards will run for six weeks.
25. To support respondents, the PDP hosted three webinars during July 2022. [Recordings of the webinars](#) can be viewed on the pension dashboard programme website.
26. The LGA submitted a [response on these consultations](#) on behalf of the FPS. In relation to the code of connection and connection guidance questions, these are more suited to software suppliers however the LGA has stated in its response that it understands that pension providers have a responsibility to assure themselves that a third-party provider has met all required standards. The LGA will recommend that FRAs' Local Pension Boards play a key role in applying an appropriate level of scrutiny.
27. Additionally, the LGA, in its response, has expressed concern that the 30-day connection time appears to be quite short and has suggested that a flow chart is provided to help each party in the connection process.
28. In respect of the data standards and usage guidance, the LGA noted in its response that clarity has been given regarding the display of different sets of values to reflect a public service pension scheme member's choice of legacy or reformed scheme benefits for the age discrimination remedy period (McCloud), and that there is facility to display different tranches of benefits becoming payable at different dates however raised concern over the absence of a commuted lump sum being displayed.
29. Additionally, the LGA has raised the need for the dashboard system to show appropriate caveats in relation to pension scheme members relying on this information where they are planning actual retirement income amounts and has pointed out the impact and complications of calculating benefits in relation to the impending Matthews case by the staging date.
30. The LGA's response on the design standards call for input broadly supported the dashboard programme's approach to design standards principles and assumptions, emphasising that information should be presented in a clear and understandable manner and that individuals must be able to understand the limitations of the data provided.
31. The secretariat will be looking to engage with the SAB to provide a more detailed response to the full consultation on design standards.

Board Actions

32. The Board is asked to comment on the proposal to provide a combined ABS-RSS by 31 August 2024.

33. The Board is asked to note the contents of the LGA response on PDP consultation on dashboard standards and guidance PDP call for input on design standards

Board Secretary
September 2022

Consultation:

standards, specifications
and technical requirements

July 2022

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1. Foreword



Chris Curry

Principal, Pensions
Dashboards Programme

Pensions dashboards have the potential to transform retirement planning and engagement with pensions. For the first time, everyone will be able to use a simple and clear online service that shows their State and occupational or personal pensions, all in one place. Once available, people of any age will be able to get a holistic view of their expected retirement income.

Dashboards will become an essential tool for retirement planning, but more than that they have the potential to engage people much earlier with their pensions. The possibilities to increase pensions savings and support earlier retirement planning are significant and dashboards will fundamentally empower consumers to build an understanding and take action or plan for later life.

In order for dashboards to fulfil their true potential and deliver this transformation to pensions engagement, the consumer experience needs to be protected and uniform. To achieve this, the foundations must be solid and pension providers and potential dashboard providers will need to prepare for the work ahead and connecting to the dashboards ecosystem.

This consultation is an important step to support industry to prepare for dashboards and the standards aim to provide the solid foundation for this challenge. **The purpose of these standards are** to ensure the security, stability, and effective operation of dashboards. They set out the technical and operational detail underpinning the primary and secondary legislation and outline the requirements for all pension providers and dashboards connecting to the ecosystem.

Our aim is that the standards and supporting guidance included in this consultation will enable both pension providers and potential dashboard providers to prepare for the connection and meet their dashboards duties. In this consultation we ask a range of questions to support refinement of the standards ahead of final publication. All pension providers and qualifying pensions dashboard services must adhere to these standards, so it is essential that they provide the right levels of clarity and detail

Delivering dashboards to provide the maximum benefit to consumers requires a dedicated effort across industry, Government and MaPS and the regulators. The standards, and adherence to them, ultimately set the end consumer experience and we are inviting inputs to help shape this work.

2. About this consultation

Introduction

Pensions dashboards will help individuals view their pensions information online, securely, and all in one place, thereby supporting better planning for retirement and financial wellbeing. Pensions dashboards are apps, website or other tools which will bring together all an individuals' private pensions (including public sector workplace pensions) and their state pension, in one secure place online.

The Money and Pensions Service (MaPS) established the Pensions Dashboards Programme (PDP) in 2019 to be responsible for designing and creating the pensions dashboards ecosystem, which contains the digital architecture that will make dashboards work. The PDP is a function of MaPS and is responsible for building and maintaining the central digital architecture (CDA) and the governance framework to support and enable the implementation and the operation of multiple pensions dashboards. This will make dashboards possible, connecting millions of individuals to their information on thousands of pensions, via multiple pensions dashboards. For more information about the pensions dashboards ecosystem and its components, see <https://www.pensionsdashboardsprogramme.org.uk>.

The purpose of standards is to ensure the security, stability and effective operation of dashboards. They set out the technical and operational detail underpinning the primary and secondary legislation and outline the duties for all pension providers (which includes the trustees and managers of occupational pension schemes as well as the managers of stakeholder and personal pension schemes) and qualifying pensions dashboards services (QPDS) connecting to the ecosystem.

Standards are separate from, but designed to complement, the FCA's (Financial Conduct Authority) regulatory framework. As the FCA regulates the conduct of firms carrying out an activity, the FCA's Handbook rules will apply to QPDS firms and can impose standards on those firms (aligned to FCA's statutory objectives) when carrying out the qualifying pensions dashboard service. The FCA will consult on its proposed Handbook rules in due course.

MaPS is developing a pensions dashboard, and we anticipate that other organisations will build additional dashboards.

Purpose of the consultation

As the Department for Work and Pensions' (DWP's) intention is for the new legislative framework to come into place from April 2023 (subject to its staging proposals applying to pension providers), we want to give the pensions industry as much notice of our plans and our direction of travel for their duties.

We are seeking views from relevant stakeholders on the content and application of these consultation draft standards and guidance. We also invite comments on any areas where further clarification or detail is required.

Standards and guidance included within this consultation

A detailed list of the questions we are asking across the range of consultation drafts is contained in Appendix A.

The standards and guidance that we are seeking views on in this consultation can be found on the PDP website and in Appendix B.

Call for Input: Design Standards

At the same time as this consultation, we have also issued a 'call for input' on the design standards. Design standards will set out the requirements for the presentation of the pensions data on dashboards and design of the dashboards, including; messaging, signposting, onward customer journeys. We are asking for responses to our 'call for input' to be returned within the same time and manner as responses to the consultation.

Duration and timetable

This consultation opened on **19 July 2022** and will run for six weeks until **30 August 2022**.

We will publish our response to this consultation on our website.

We aim to issue our final standards (apart from design standards) as close to the date the new legislative dashboard framework becomes law – our standards cannot come into force beforehand. In our consultation response, we will explain how we will be presenting the final documents and/or content.

Who is this consultation aimed at

Although we welcome views from any interested parties, primarily this consultation is aimed at:

- pension providers,
- organisations interested in setting up QPDS, and
- organisations interested in supporting pension providers to comply with their duties:
 - pensions administrators,
 - pensions administration software providers, and
 - firms interested in offering Integrated Service Provider (ISP) services.

We are also keen to hear from:

- pensions and lifetime savings industries,
- finance and consumer representative groups with an interest in pensions engagement, financial wellbeing, data protection and security, and
- financial technology (Fintech) companies.

This consultation applies to England, Wales and Scotland and Northern Ireland.

How to respond to this consultation

Please provide your consultation responses and email to infopdp@maps.org.uk.

When responding please indicate which standard, guidance or call for evidence you are responding to and whether you are responding as an individual or representing the views of an organisation.

Consultation principles

This consultation is being conducted in line with the [Cabinet Office consultation principles](#).

Confidentiality and data protection

The information you send us may need to be passed to colleagues within PDP/MaPS. It may be published in a summary of responses received and referred to in the published consultation response.

We also anticipate that we may share information with our key working partners: the FCA, the Pensions Regulator (TPR) and the DWP. All information contained in your response, including personal information, may be subject to publication or disclosure if requested under the Freedom of Information Act 2000.

By providing personal information for the purposes of the public consultation exercise, you consent to its disclosure and publication. If this is not the case, you should limit any personal information provided, or remove it completely.

If you want the information in your response to the consultation to be kept confidential, you should explain why as part of your response, although we cannot guarantee to do this.

3. About the standards and guidance

Standards and guidance included within the consultation

It is important for there to be uniform mandatory requirements on all pensions dashboards ecosystem participants, to ensure the ecosystem functions effectively and efficiently, while putting the interests of consumers first. These are standards. Standards set out the technical and operational detail that underpins the primary and secondary legislation. They outline the mandatory requirements on QPDS and pension providers detailing how operationally, technically or in practice they must meet the duties set out in the regulations/rules.

Standards provide more flexibility than primary or secondary legislation, allowing for further iteration and development as the service matures: as this is a digital service, we need to be able to implement changes in service requirements in a simple and timely manner, without always amending legislation. How we will approach changing standards is outlined in the governance approach.

We are not only consulting on standards but other products. Two of those products are distinct types of guidance:

Statutory guidance

This only applies to pension providers. They must either follow this guidance or have good reason for departing from it. Where they depart from this guidance, the pension provider should be able to demonstrate that they have achieved the same result via their alternative path. The status of this comes from the DWP's secondary legislation.

'Recommended' guidance

Some guidance is recommended. Where possible, this guidance should be implemented where possible to enable optimal user outcomes.

In Appendix B we explain which products are guidance and when they have a different standing. In the final standards and guidance, we will explain how to differentiate between the standards and guidance when we are using different sets of guidance.

How we have developed these standards

This consultation is the result of intensive, and extensive, work with the DWP, the Government Digital Service, FCA and TPR as well our suppliers (Cap Gemini and Origo). We are especially grateful to the pensions industry's assistance and the time they have given up helping us develop the content and the policies as represented in these consultation draft standards. This includes the industry secondees lent to the PDP, the various PDP steering and working groups, the assistance of industry subject matter experts, the support and engagement of industry bodies as well as our alpha dashboard and data

providers (who are helping us test the CDA and our policies as we build them), webinar attendees as well as specific queries we have received directly and via stakeholders.

Power to set the standards

The power to issue set standards and mandatory guidance is set out in Part IV of the Pensions Schemes Act 2021 (and the equivalent Northern Ireland legislation when it is put in place). This will be supplemented in the secondary legislation (applying to QPDS and occupational pensions schemes) and the FCA rules (which apply to personal pension schemes).

The DWP is responsible for putting in place the secondary legislation. Neither the DWP nor FCA has finalised these provisions. Both have issued consultations in respect of their proposals and the [DWP have published a response document](#) which confirms their policy. The secondary legislation is due to be published later this year.

Even though the power to issue standards and guidance currently (the longer-term governance has yet to be decided) rests with MaPS as the responsible entity, the standards and guidance have been developed by PDP on behalf of MaPS. Any references to PDP within individual standards and guidance documents should be read as such.

DWP consultation response

This consultation is based on our understanding of the DWP's policy position as set out in their [consultation document response](#). The FCA's rules for personal pension schemes must take in account the DWP's secondary legislation (see (the to be brought into force) section 137FAA(8) Financial Services and Market Act 2000). To the extent there is any material changes between our understanding and the DWP's final secondary legislation or the FCA's final rules, we will consider whether to re-consult on these areas.

The DWP's secondary legislation will apply to Great Britain. We are working on the assumption similar secondary legislation will be put into place for Northern Ireland and the FCA's rules will apply to Northern Ireland. Therefore, the products which are subject to this consultation will be of application to the United Kingdom.

Interaction with the FCA and HMT's consultations

Operating as a QPDS will be a FCA regulated activity. HM Treasury will be introducing legislation to make this clear. The FCA will also be introducing QPDS Conduct of Business Rules. This will be subject to a separate consultation.

Adherence to the standards

Standards will be used to check QPDS and pension provider compliance with, amongst other things, their dashboard connection and reporting obligations.

Where appropriate, we will work with QPDS and pension providers to help reconcile any potential compliance issues. However, as adherence to the standards is an important requirement, and vital to the security, stability, and credibility of the pensions dashboards ecosystem, we will also put in place processes to escalate *all breaches* we identify to FCA/TPR.

Failure to adhere to our standards or have regard to our guidance can be used as evidence of breach of legal duties and may be used by the FCA or TPR in any regulatory action. Also, we reserve the right to disconnect any pension provider or QPDS from the ecosystem for breaching their dashboard duties, which for pension providers would mean they would not be able to meet these obligations.

Appendix A: consultation questions

Standard, Guidance etc	Consultation questions
Code of connection	
Operational standards	Do any of the proposed requirements pose a specific problem for your organisation, if so, what?
Security standards	Are there any areas that you consider are missing from the code of connection?
Service standards	Do the proposed service levels seem reasonable for a digital service?
Connection guidance	<p>CoCo 2.1.3 requires view request responses within 2 seconds. This prioritises a fast response for the consumer. It may, however, create a barrier to calculating real time values for some providers. We would be particularly interested in views on this approach.</p> <p>Do the proposed steps for connecting to the dashboards ecosystem directly seem reasonable?</p> <p>Do the proposed steps for connecting to the dashboards ecosystem (via a third-party connection) seem reasonable?</p> <p>Does the proposed timeframe for completing these steps to connect seem reasonable?</p> <p>Is it clear what pension providers/their third-party ISPs (Integrated Service Providers) or dashboard providers will need to do to connect?</p> <p>Is there any additional guidance you need in relation to connection? And if so, what?</p>
Data	
Data standards	Are you confident that the proposed data standards adequately cover the benefit structure of all pension providers? Can it express the correct values to

Usage guidance	<p>all savers? If not, please share a brief description of the relevant benefit structure?</p> <p>Are the values allowed for the accrued (2.3xx) and ERI (Estimated Retirement Income) (2.4xx) warnings sufficient? Are there any other common reasons or scenarios you think these warnings should cover (bearing in mind we cannot support scheme-specific warnings).</p> <p>Would the ability to add a short piece of free text to cover pension provider-specific issues be workable for you, or introduce a new burden? If so, how many characters would be required and what topics would it cover?</p> <p>Without a new unique reference to link two pension elements together, the benefit values may get presented separately in a dashboard. Would the requirement for a scheme to create that new reference and share it with their other administrators be more onerous than dealing with any potential downside from not presenting the benefit values together onscreen?</p>
Design	
Design Standards: Call for Input	<p>Do you have any challenges (or support) in relation to our developing policy on design standards?</p> <p>Do you have any evidence to support your input?</p> <p>Have we omitted any issues in developing our policy on design standards?</p> <p>Do you agree with our approach to design standards principles and assumptions?</p> <p>In you or your organisation's experience (please provide evidence if you are able), are there any important principles or assumptions missing in our approach?</p> <p>Are we right to favour the user over the QPDS where there is any conflict between their needs?</p>
Reporting	
Reporting standards	Please provide comments on our overall breadth of information required.

	<p>Are there any technical barriers to you in supplying the reporting data?</p> <p>Are there any barriers to providing both the auditing and monitoring data feeds in mostly near real time?</p> <p>Management information and oversight data is to be provided daily. Do you have any alternative suggestions which would achieve our aims?</p> <p>The transport method for data is to push data to an API housed on the central data architecture API gateway. Do you perceive any risks with this approach?</p>
Technical	
Overview guidance	Do any of the proposed requirements pose a specific challenge for your organisation?
API (Application Programming Interface) Standards	<p>Are there any areas where further detail is needed?</p> <p>Do the proposed service levels seem deliverable for your organisation?</p>
Technical (other)	<p>Do the proposed timeframes seem reasonable?</p> <p>Is there any more guidance you need in relation to these requirements?</p>
Early connection	
Early connection guidance	<p>Do you consider the notification requirement to be reasonable?</p> <p>Do you consider the minimum requirement for at least a month's extension (for schemes with an existing date) to be reasonable?</p>
Governance	
Setting standards	<p>Do you have any comments on the change process and timeframes?</p> <p>Do you agree with our definitions of major and minor changes to the standards?</p>

Consultation Document	
	Are you clear on the differences between standards, statutory guidance and recommended practice?

Appendix B: summary of all consultation standards and guidance

Standard or Guidance	Brief description and link to consultation	Applies to		Standard or guidance		
		QPDS	Pensions providers	Standard	Have regard to guidance	Recommended guidance
Code of connection						
Operational standards	Onboarding procedures, dispute management processes and service level failure protocols Code of connection	✓	✓	✓		
Security standards	The minimum amount of assurance that the provider provided for connection purposes and security assessment procedures Code of connection	✓	✓	✓		
Service standards	Cover matters service availability, connection state changes (such as scheduled downtime or maintenance), and notification requirements Code of connection	✓	✓	✓		

Connection guidance	Details the process to be followed when connecting to the Ecosystem Connection process and guidance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Data						
Data standards	Outlines the formatting of the data items to be provided dashboards Data standards		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Data usage guide	Explanatory guidance to support the Data Standards Data usage guide		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Design						
Design standards: call for input	Detailing our current position on the requirement for the dashboard display of the view data as well as messaging, signposting, onward customer journeys. Design standards: call for input	<input checked="" type="checkbox"/>				
Reporting						
Reporting standards	Details reporting and auditing requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

	Reporting standards					
Technical						
Overview guidance	Explanation of how the pensions ecosystem operates, including technical requirements Technical standards	✓	✓			✓
API (Application Programming Interface) Standards	Explains the connection mechanism and the access management protocol used Technical documentation	✓	✓	✓		
Technical (other)	Methodology for the generation of tokens, GUIDs (globally unique identifiers) and Pels (Pension Identifiers) Technical documentation	✓	✓	✓		
Early connection						
Early connection guidance	When to apply for earlier connection to the pension ecosystem (including for pension providers with <100 relevant members)		✓		✓	

	<u>Early connection guidance</u>					
Governance						
Setting standards	Outline of how we will keep standards up-to-date and amend them (including timings and notification) <u>Approach to governance for standards</u>	n / a	n/a	n/a	n/a	n/a