

# Pensions Dashboards Programme

## Progress Update Report

October 2020



# About us

The vision of the Pensions Dashboards Programme couldn't be simpler: "to enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing". Chris Curry, Principal of the Pensions Dashboards Programme.

## **Our role in delivering pensions dashboards**

The Money and Pensions Service (MaPS) has established the Pensions Dashboards Programme team, led by Principal, Chris Curry, to design and implement the infrastructure that will make pensions dashboards work.

The Money and Pensions Service will develop a dashboard (the MaPS dashboard) as part of its function to provide information and guidance on pensions, but other organisations will also provide dashboards. We are working closely with industry, government and the regulators to maintain alignment.

## **What is a pensions dashboard?**

Pensions dashboards will enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing. Dashboards will provide clear and simple information about an individual's multiple pension savings, including their State Pension. They will also help them to reconnect with any lost pension pots.

Read the full [pensions dashboards feasibility report and consultation, and the Government's response](#)



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# 1

## Foreword from Chris Curry

Chris Curry was appointed in 2019 on a part-time basis as Principal of the Pensions Dashboards Programme at the Money and Pensions Service. Chris reports into Chair of the Money and Pensions Service, Sir Hector Sants.

Chris brings valuable expertise and insight gained in his other role as the Director of the Pensions Policy Institute (PPI) where he continues to work part-time. Chris has worked on important projects such as the Department for Work and Pensions Auto-Enrolment Review Advisory Group in 2017, where he was co-chair and led on providing advice on the theme of contributions.



**Chris Curry**

**Principal, Pensions  
Dashboards Programme**

### **Welcome to the second progress update report for the Pensions Dashboards Programme.**

When we published our first report in April 2020, there was a great deal of uncertainty about how the coronavirus pandemic would affect our work and that of our delivery partners. It was a time of rapid change and startling headlines and we were all required to adapt very quickly in our personal and professional lives.



**...the last six months have  
highlighted the desire, both  
internally and externally, for  
this programme to succeed.**



As the country went into lockdown, the only direct impact on the programme was our decision to delay the formal call for input on data scope and definitions until the summer, following requests from industry and our delivery partners. This ensured that we could gather feedback from a broad range of stakeholders at a less frenetic and challenging time.

Despite the continuing challenges resulting from the pandemic, the last six months have highlighted the desire, both internally and externally, for this programme to succeed. We have engaged with many of you on key topics such as data standards and the digital architecture. Our Steering Group, which represents the interests of consumers and stakeholders within the pensions, financial services and fintech sectors, has continually offered its expertise, critical challenge and support and has made sure that the views of

its constituents have been heard in all our discussions.

We have received invaluable engagement on data standards from industry and organisations representing potential dashboard users via the call for input and through the Data Working Group. We also recently convened the Usability Working Group to gather and share key insight on user needs with representatives from the pensions and fintech industry, government, regulators and consumer groups to ensure that users are at the heart of everything we do. We are grateful to have such a wide range of expertise at our disposal via these working groups.

Equally, the useful insight we gleaned from your responses to the request for information in relation to the digital architecture, is a great example of how your expert input was crucial to supporting our progress. Thank you for giving us your precious time and expertise during such a time of uncertainty. We will continue to seek your views and input on key topics as the programme progresses.

Recognising the significant interest in pensions dashboards and the need to enable industry to get ready, we have spent much of this period building an indicative phase plan for delivery and we are pleased to be able to publish this today. This has not been an easy task as a programme of this scale and complexity carries many dependencies. We know that those of you in the industry want us to tell you what you need to do and by when. As we continue to firm up the plan, we will communicate this to you.

And finally, despite some constraints on parliamentary time, the Pension Schemes Bill completed its passage through the House of Lords in July and is now receiving scrutiny in the House of Commons. This will set the high-level legislative framework, within which pensions dashboards will operate, to compel pension schemes and providers

to make people's data available to them via a dashboard. We expect to see all the detail specified in regulations, rules and guidance.

Please take the time to read this report, explore our website and sign up to our LinkedIn and Twitter accounts and our email newsletter for regular updates on our work.



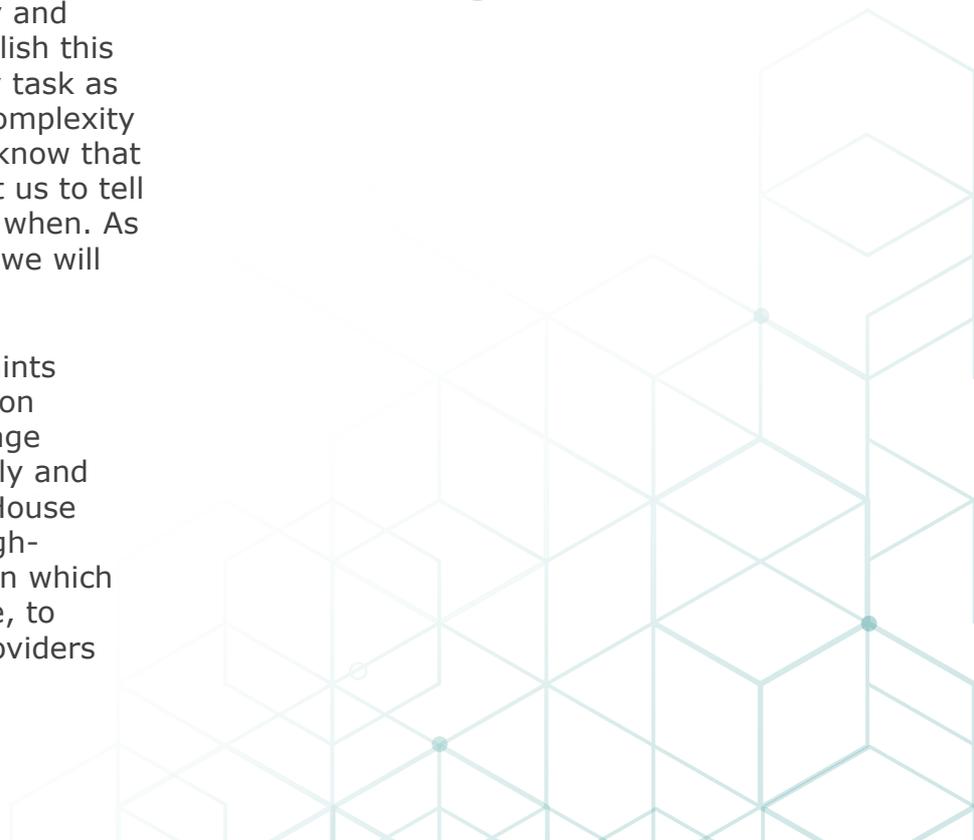
**We have received invaluable engagement on data standards from industry and organisations representing potential dashboard users via the call for input and through the Data Working Group.**



With my sincere thanks to you all for your help, input and support over the last six months.

Best wishes,

**Chris Curry**  
**Principal, Pensions**  
**Dashboards Programme**



## 2 Executive summary

The Money and Pensions Service (MaPS) established the Pensions Dashboards Programme (PDP) in July 2019.

The widely shared aim for pensions dashboards is to enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing.

The PDP is responsible for establishing the pensions dashboards ecosystem which will enable users to view their pensions data via their chosen dashboard. We are responsible for developing the secure digital architecture and governance framework to support and enable the implementation and operation of pensions dashboards.

The Money and Pensions Service is developing a pensions dashboard and it is anticipated that industry will build additional dashboards.

This is our second progress update report and provides a summary of what we have achieved since April 2020, when we published our first report. We have made significant progress on the priority areas as set out in the last report and work on a number of additional areas is underway.

### Summary of achievements

- we recognise the importance of and the need for industry to be able to prepare for the implementation of pensions dashboards. We have developed an indicative phase plan and a high-level activity plan which we are publishing as part of this report
- we have convened a cross-government group called the Portfolio Committee. Composed of the programme's key delivery partners, this group will enable the effective management of the programme's interdependencies
- we have expanded the PDP team, effectively doubling in size, to ensure we have the capacity and capability to deliver the next phases of the programme, as set out in the plan. We have successfully recruited and onboarded our new team members, while working remotely
- we have carried out a market engagement exercise to help us finalise our requirements for the digital architecture and expect to begin a formal procurement process once we have the appropriate approvals in place
- we have refined our requirements for identity verification. We have commenced a market engagement exercise, to help us finalise our requirements and determine our delivery approach



**The Money and Pensions Service is developing a pensions dashboard and it is anticipated that industry will build additional dashboards.**



- we are reviewing the feedback from our engagement on data standards. We will publish an initial version of data standards in December
- we have convened a Usability Working Group to work with the pensions and fintech industries, government, regulatory and consumer representatives to ensure that the user is at the heart of everything we do
- we have launched our new, dedicated website, email newsletter and LinkedIn and Twitter accounts and will continue to share timely and informative updates via these channels

- we continue to work closely with the Department for Work and Pensions (DWP), The Pensions Regulator (TPR) and the Financial Conduct Authority (FCA) to help develop the legislation and rules that will make pensions dashboards a reality

## Focus and priorities

Over the next six months we will be focused on scaling up the programme team to put us in the best position to ensure successful delivery.

We will:

- finalise requirements and seek approval to commence formal procurement for a supplier(s) to work with us to deliver the dashboards' digital architecture
- engage with the commercial market and finalise our requirements for identity verification
- publish data standards and validate them further via user testing and user research

- develop an onboarding strategy for pension providers and schemes
- identify the first set of volunteer pension providers, schemes and administrators to help develop and test the digital architecture
- develop our policy thinking around liability and consumer protection, to ensure that users can access dashboard services safely and that the process for redress is clear
- develop user-centric service and design standards
- develop our phase plan and timeline to provide more clarity and certainty for industry and others
- engage with industry and others and communicate progress on an ongoing basis



## 3 Background and context

Pensions dashboards will enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing. Dashboards will provide clear and simple information about an individual's multiple pension savings, including their State Pension and will also help them to reconnect with any lost pension pots.

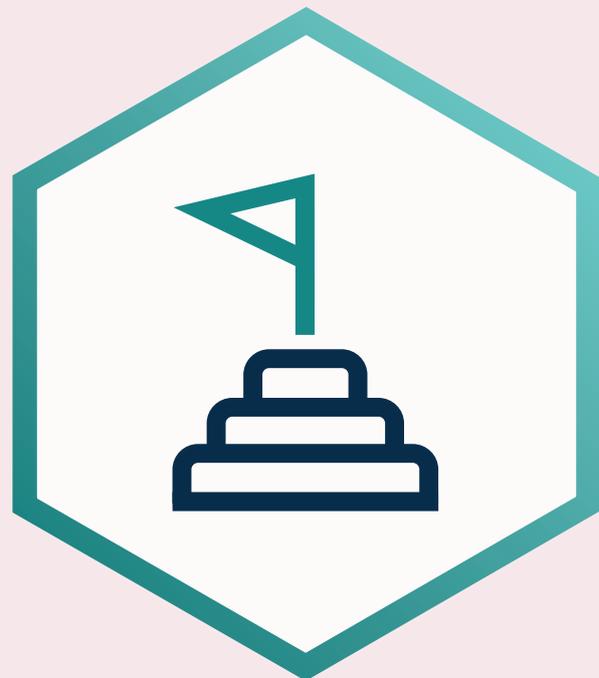
The Pensions Dashboards Programme is part of the Money and Pensions Service (MaPS). In 2019, MaPS established the Pensions Dashboards Programme led by Principal, Chris Curry, to design and implement the infrastructure that will make pensions dashboards work. MaPS has published the UK Strategy for Financial Wellbeing, including an ambition to get 5 million more people understanding enough to plan for and during later life by 2030.

The Money and Pensions Service will develop a dashboard (the MaPS dashboard) as part of its function to provide information and guidance on pensions, but we anticipate that other organisations will also provide dashboards.

The pensions dashboards goals are set out below.

### Pensions Dashboards Goals

1. connect people with all their pensions
2. present information clearly in plain English
3. show a comparable estimated retirement income for each pension (enabling people to see the total income they might have to live on in retirement)
4. signpost people to impartial guidance and/or regulated advice
5. enable people to understand the information they're seeing
6. increase people's confidence making them feel more capable
7. empower people to make more informed choices about their pensions
8. contribute to people's overall financial wellbeing



The Pensions Dashboards Programme team is responsible for developing the pensions dashboards ecosystem, which will enable individuals to view their pensions information online via their chosen dashboard.



**Pensions dashboards will enable individuals to access their pensions information online, securely and all in one place...**

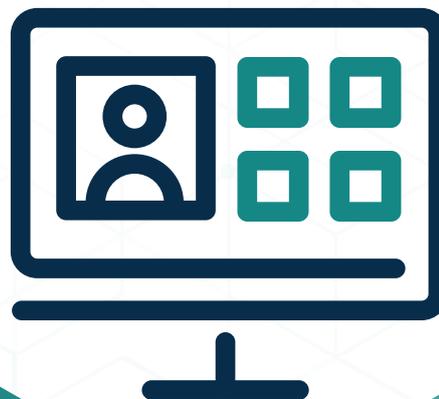


The vision of the Pensions Dashboards Programme is clear:

“To enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing.”

In April 2020, we published our first progress update report alongside two data working papers, just as the coronavirus pandemic had arrived in the UK and the country had gone into lockdown. The Pensions Dashboards Programme and most of our delivery partners have been working remotely since the publication of the report but despite the unprecedented circumstances, we have made considerable progress against a number of key milestones.

This, our second progress update report, provides an indicative phase plan for delivery, sets out our achievements since April 2020 and provides information about what we will be focusing on over the next six months.



## 4 Building the team

Since April, we have focussed on scaling up the team, both in terms of size and capability to enable the delivery of our work programme. A key early priority has been expanding our leadership team, to bring in an Interim Programme Director, Head of Product and Head of Delivery - all of whom have experience of delivering major public sector digital programmes. These roles have bolstered the existing leadership team and provided extra support to reflect the growing size and complexity of the programme.

“ **The next focus areas for growth will be in technology and onboarding. We will recruit a small and highly specialised technology team, who will work with our selected partners to develop the technology for the dashboards ecosystem.** ”

Of equal importance has been the expansion of the wider programme team. We have drawn from a pool of talented individuals from both the private and public sectors and used a range of engagements, such as secondments, fixed-term appointments and contingent labour. This has allowed us to get the right people with the right skills at the right time.

Since April 2020, the team has doubled in size from approximately 20 to 40 and we envisage increasing this to more than 50 by April 2021. We have evolved into four distinct teams; delivery, industry liaison, policy and engagement, and product. We have developed effective working methods that recognise the interdependency of the workstreams.

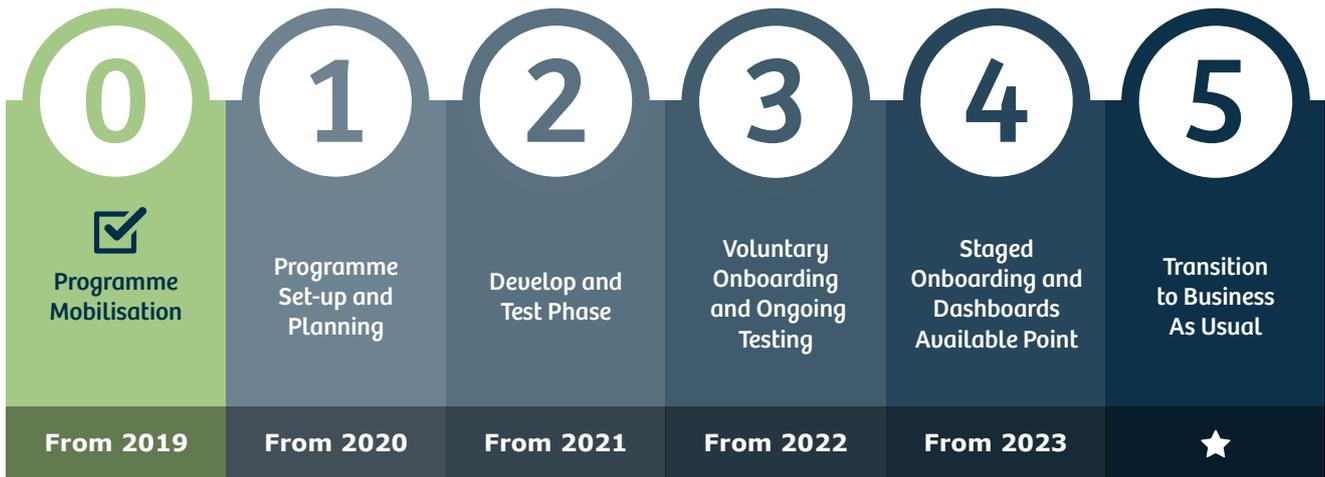
### What's next?

- in the coming months we will continue to develop our people and resourcing strategy to ensure we plan for and attract talented people with the right skills. We are currently recruiting for a capability lead to assist us in this work and have also begun the process to appoint a permanent programme director
- the next focus areas for growth will be in technology and onboarding. We will recruit a small and highly specialised technology team, who will work with our selected partners to develop the technology for the dashboards ecosystem
- over the next six months, we will begin creating an onboarding plan. This will set out the approach we will take to connect pension providers and administrators to the dashboards ecosystem. We will work in partnership with the industry, as well as the regulators and the Department for Work and Pensions (DWP), to identify the key steps required and to articulate the policies, systems and processes we plan to use
- this plan will develop over time as we learn more about the technical requirements of both the ecosystem and schemes. As we move into the voluntary onboarding stage, we will test our approach set out in the plan to ensure that it is as efficient and effective as possible

## 5 Timescales and approach

We have broken the delivery of the programme into six distinct phases, each of which contain several wide-ranging and complex dependencies.

### Indicative programme phase plan



Phase	Plan
<p>0</p> <p>From 2019</p>	<p><b>Programme mobilisation - Complete</b> <input checked="" type="checkbox"/></p> <p>This phase involved moving the programme out of the Department for Work and Pensions (DWP) and into MaPS. DWP set a number of criteria to complete, including the appointment of a Principal, setting up a steering group and an initial setup plan.</p>
<p>1</p> <p>From 2020</p>	<p><b>Programme set up and planning</b></p> <p>This phase involves setting up the programme, which includes recruiting the team, agreeing the architecture, setting up working groups, seeking approval to commence procurement for a supplier or suppliers for the digital architecture and setting the first iteration of data standards.</p>
<p>2</p> <p>From 2021</p>	<p><b>Develop and test phase</b></p> <p>Upon the completion of our procurement, which will be subject to approval, we will work closely with our chosen supplier(s) to quickly onboard them and begin building, integration and testing of the digital architecture. During this time, we will continue to develop design and service standards and select the first dashboard providers for user testing.</p>

Phase	Plan
<p><b>3</b></p> <p><b>From 2022</b></p>	<p><b>Voluntary onboarding and ongoing testing</b></p> <p>This is the point at which we will connect volunteer pension schemes and providers to the service, using real data. It also represents the point at which the programme is most reliant on other organisations' willingness to participate, before they are required to by law.</p>
<p><b>4</b></p> <p><b>From 2023</b></p>	<p><b>Staged onboarding and dashboards available point</b></p> <p>In this phase, schemes and providers will begin to be compelled to connect to the ecosystem by law. We will reach the 'dashboards available point' during this phase, when the number of pensions being findable will be sufficient for it to be of use to a critical mass of consumers. We do not yet have enough information to specify exactly when this will be.</p>
<p><b>5</b></p>	<p><b>Transition to business as usual</b></p> <p>This phase assumes a high level of coverage, meaning that the service is running in a steady state and can be transitioned into an ongoing delivery and maintenance arrangement. The timing of this phase is to be determined.</p>

This is an indicative timeline that will be further refined during the next six months ahead of our next progress update, when we expect to know more about procurement and delivery timelines.



## 6 Programme dependencies

It is important to stress the complexity of this plan alongside the **dependencies on other organisations**. While we have developed our own phase plan, movement into the next phase will often be dependent on other organisations completing actions at a specific time. Conversely, other organisations are also reliant on us delivering some aspects of our work before they can progress their areas of responsibility.

The responsibilities of different organisations are set out below.



### Department for Work and Pensions

DWP will need to ensure the legislation is in place: for compulsion in relation to occupational pensions; for qualifying dashboard services; and for the FCA to make rules for compulsion in relation to personal pensions. The draft primary legislation is currently before Parliament and plans are underway for drafting secondary legislation. We will need to sufficiently develop our design work to feed into this activity.



### HM Treasury

HM Treasury will need to amend the Regulated Activities Order<sup>1</sup> to create a new regulated activity of providing a dashboard. Preparation for this has begun, with detailed conversations between HM Treasury, DWP and FCA about the nature and scope of the regulated activity. The amendment to the Regulated Activities Order may have to take place after DWP regulations have been created.

### FCA Financial Conduct Authority

The FCA will need to make rules so that compulsion applies to personal pensions providers and design a proportionate supervisory regime. The Pension Schemes Bill requires that the FCA must take account of corresponding regulations for occupational pension schemes.

The FCA will also need to determine a new and appropriate authorisation approach for firms seeking permission to undertake the new regulated activity and make conduct rules that authorised dashboard providers must comply with. They will also need to design a proportionate supervision regime.

Before the FCA can finalise all these new rules, the Financial Services and Markets Act (2000) (FSMA) requires that the FCA must carry out a cost-benefit analysis of, and consult on, draft rules. After finalising the rules, the FCA must allow firms an appropriate period of time to apply for authorisation and/or comply with them.

The FCA will adopt a proportionate approach to supervision and enforcement in respect of these new requirements.

<sup>1</sup> The Financial Services and Markets Act 2000 (Regulated Activities) Order 2001



## The Pensions Regulator

In recognition of the complexity and diversity of the landscape it regulates, TPR will take a proactive approach in engaging occupational pension schemes as they prepare to comply with new duties. This will include raising awareness and understanding among schemes, as well as key enablers (in particular administrators, administration software providers and emerging integrated service providers) of what has to be done and by when. There will also need to be a proportionate, but robust compliance and enforcement regime in place to deal with any schemes that fail to meet their obligations. In delivering this role, TPR will bring to bear the lessons from the successful implementation of the automatic enrolment programme. TPR will need to be sufficiently resourced, have sufficient lead-time once detailed requirements are finalised, and have a delivery plan in place.



## Dashboard providers

Organisations (including the Money and Pensions Service) will deliver the user interfaces - pensions dashboards. The data standards and the other technical design work we are carrying out will feed into this development. Our expectation is that the amendment to the Regulated Activities Order and the development of the authorisation and conduct rules will need to take place before commercial pensions dashboards can be made generally available to the public. We will work with dashboard providers with a view to enabling testing in advance of this.



## Pension providers and schemes

Pension providers and schemes need to ensure that they prepare their data, bringing it to a state of readiness. This will ensure that the dashboards can match pension entitlements to individual identities and display accurate information to the user about their pensions.

We understand the importance of providing certainty to industry around the standards that providers and schemes will need to adhere to. This will allow them to prepare properly and consider business planning cycles. Our phase plan indicates that regulation will begin to compel providers and schemes to connect to the ecosystem from 2023. Providers and schemes will need to know what information has to be provided, how it has to be provided and when compulsion will apply to them, in order to make decisions about implementation.

We recognise that different pension providers and schemes will currently be in different states of readiness, in terms of how they hold pension entitlement data and in making assessments of the quality of that data. There are things that providers and schemes can do now to modernise the way they hold data and to understand and improve the quality of the information. For example, schemes that do not currently hold data in a digital format should consider taking steps to begin to address this; and schemes that have not recently assessed the quality of the data they hold, should urgently undertake this assessment and make a plan for improvements where necessary.

We will spend the next six months adding more detail to our plans and will need to work closely with industry to understand the impact of our proposals as they become available. This relies on pension providers and schemes engaging on the detail of our proposals and developing their implementation plans and approaches to reflect these.

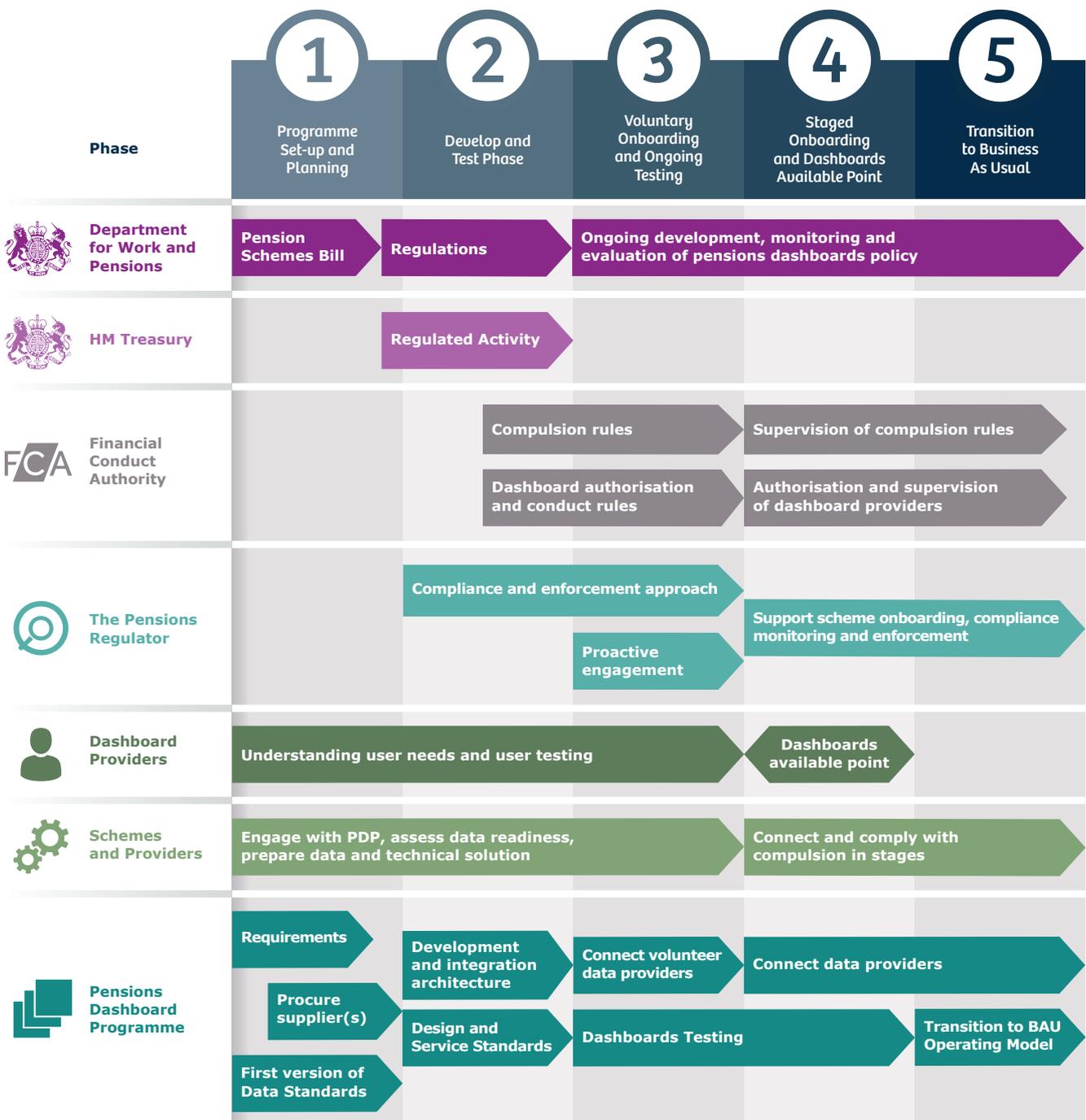
The first step to achieving this, will be the publication of the first version of data standards expected by the end of 2020. We will also prioritise the development of an onboarding plan, which will provide further information on the order in which schemes will be required to connect to the dashboards' infrastructure.

# Pensions Dashboards Programme

The PDP is responsible for delivering the central digital architecture and the associated standards and governance. We need to progress this work to a level of detail that enables a sufficient level of understanding of the design and requirements for many other aspects of wider delivery to begin.

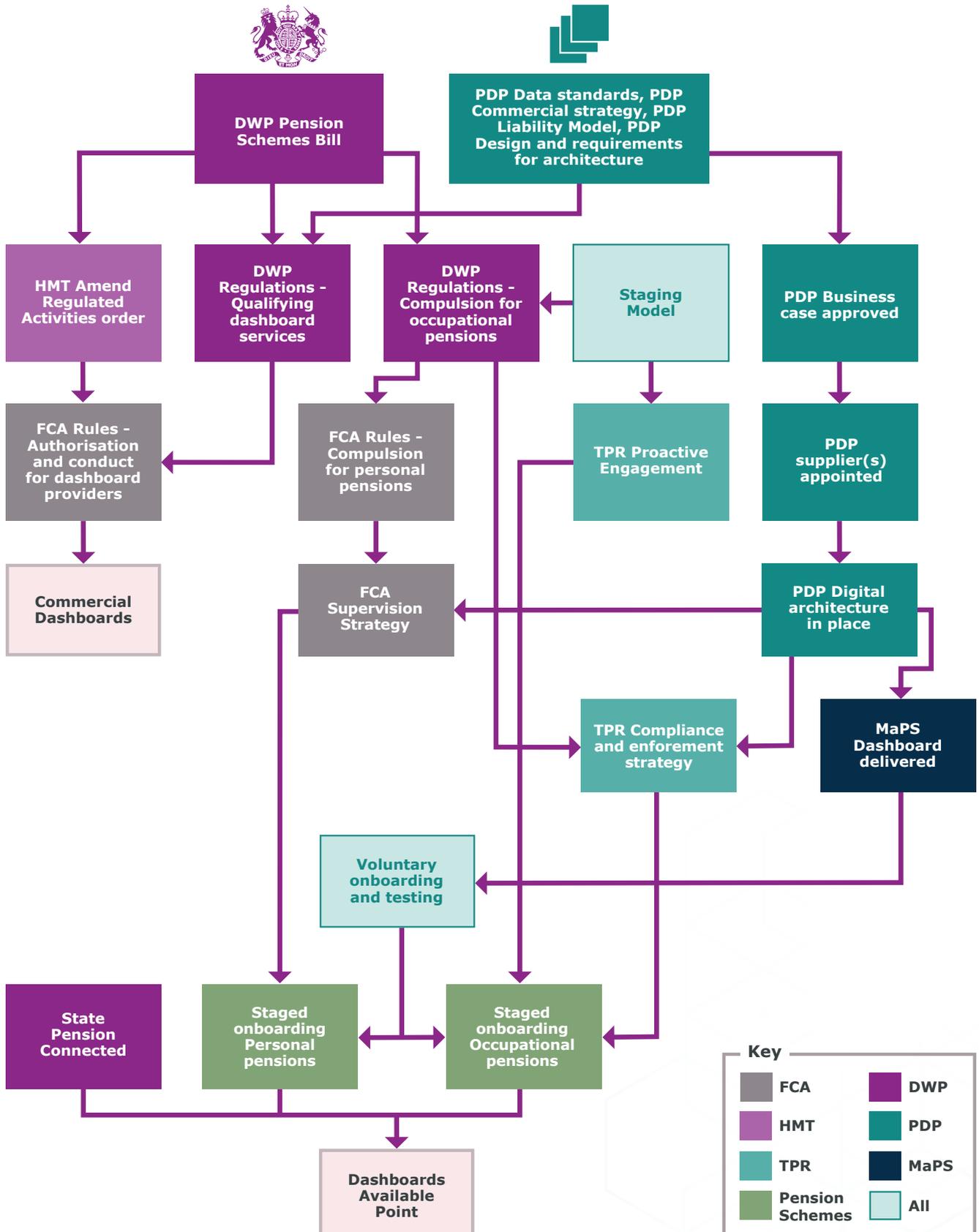
Only by fully mapping out the dependencies and working closely with our partners can we ensure the success of the programme. The diagrams below show how the activities described above align with the indicative phase plan and where there are critical dependencies on the path to delivery.

## Pensions dashboards: high level activity plan



**NB. 'Dashboards available point'** - a point during Phase 4 when the number of pensions being findable will be sufficient for it to be of use to a critical mass of consumers.

### Pensions dashboards dependencies



PDP activity will play an important role in setting in train a critical path of activity. There is a high level of interdependency between DWP needing to deliver legislation and the development of the data standards and the staging model. The diagram above shows the critical dependencies for the programme.

### What's next?

Over the next six months we will focus on scaling up the programme team to put us in the best position to ensure successful delivery. Our key activities are listed on the next page.

1. we will finalise requirements and seek approval to commence formal procurement for a supplier(s) to work with us to deliver the dashboards' digital architecture
2. we will engage with the commercial market and finalise our requirements for identity verification
3. we will publish data standards and validate them further via user testing and user research
4. we will develop an onboarding strategy for pension providers and schemes
5. we will identify the first set of volunteer pension providers, schemes and administrators to help develop and test the digital architecture
6. we will develop our policy thinking around liability and consumer protection to ensure that users can access dashboard services safely and that the process for redress is clear
7. we will develop user-centric service and design standards
8. we will develop our phase plan and timeline to provide more clarity and certainty for industry and others
9. we will engage with industry and others and communicate progress on an ongoing basis



## 7 Programme governance and assurance

Governance arrangements for programme delivery are complex. The framework established has been designed to be inclusive – bringing together public sector and industry stakeholders, and robust - providing assurance to the Programme’s senior responsible owner, Chris Curry, that delivery is on track.



**Programme assurance is provided principally through annual independent reviews, and audits.**



In addition to the previously detailed governance fora, such as the Programme Board and the Steering Group, which have continued to meet regularly, we have convened a Portfolio Committee. This recognises key dependencies set out above between public sector bodies and therefore is a senior-level group, composed of all those bodies involved in the programme (PDP, MaPS, DWP, TPR, FCA), with a focus on cooperation and collaboration. It meets quarterly and aims to endorse a shared delivery plan, manage strategic delivery risks and review complex policy issues. With confirmed senior attendees, the successful convening of the Portfolio Committee represents another key step in delivering pensions dashboards.

Programme assurance is provided principally through annual independent reviews and audits. An integrated approval and assurance plan ensures that these events take place at key points in the programme lifecycle, providing the senior responsible owner with confidence that the programme is able to continue.

In September, a three day independent assurance review of the PDP was conducted by Infrastructure and Projects Authority (IPA) reviewers. The review team gave a positive assessment of the significant progress made this year, the strength of the leadership and the confidence expressed by stakeholders. Recognising the challenge of delivering this complex programme, they made a number of recommendations to ensure the sustainability of the pace and quality of delivery.

### What’s next?

- over the next six months we will implement the recommendations made by the independent review. We will work closely with our delivery partners, using the Portfolio Committee as a key forum to refine our planning, critical path and risk management
- we will also draw on the expertise of our Steering Group to provide direction and assurance on our procurement approach, technical development and policy focus
- we will keep our governance arrangements under close review to ensure that they remain fit for purpose

## 8 Risks

The Pensions Dashboards Programme is an extremely complex programme of work with many risks and dependencies associated with it, some of which fall outside the programme. We have undertaken significant activity to identify risks and develop supporting processes to ensure we continue to identify new risks and manage and mitigate active risks appropriately.

Work has continued over the summer to refine and articulate the risks and ensure these are maintained and regularly reviewed through formal processes, including risk review meetings where we consider any new risks and ratings changes. The programme has also worked closely with colleagues in MaPS to ensure that our processes are robust and we are properly maintaining risks. There is more to do on risk and we anticipate the number of risks currently captured will continue to grow as the different workstreams of the programme get into the detail.

Over the next six months, we will continue to monitor and refine our processes as appropriate and actively manage our risks, ensuring we understand the wider risk landscape to fully reflect the size of the task that faces us. Crucial to this is the creation of the new Portfolio Committee to work more effectively with members to ensure that risks can be considered from a wider perspective and that there is joint understanding of the complex dependencies that link our respective organisations. We will use this forum to develop and commit to a joint delivery and risk plan that will be essential to ensure successful delivery of the programme.

### Risk themes

Although there are many wide-ranging risks to enable pensions dashboards, they have been grouped into themes to allow effective management. These are set out below:

**User experience** – as users of dashboards and potential outcomes when using them

**Delivery partners** – effectiveness of delivery partners and arrangements for working together to achieve a common aim

**Stakeholder buy-in** – the need to engage with a wide range of stakeholders to ensure optimal design and delivery

**Primary legislation, regulations and rules** – timetable and content

**Communications** – effective communications by all delivery partners and industry

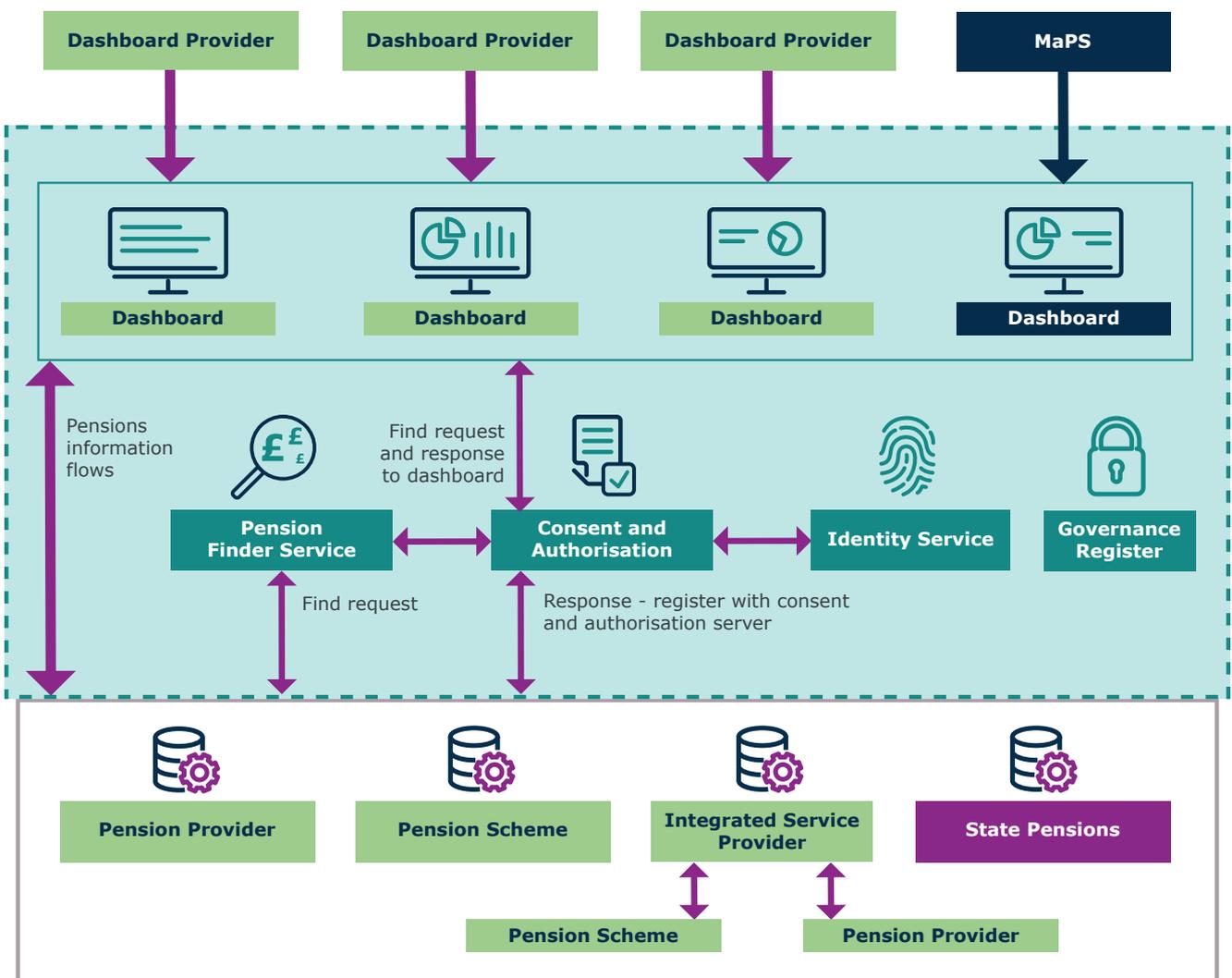
**Dashboard service** – the operation and support of dashboards and the ecosystem are secure, efficient, flexible and scalable

**Staged onboarding** – deliverability of implementation approach for PDP, industry and regulators

# 9 Assuring the design of the pensions dashboards ecosystem

Our priority over this period has been to achieve consensus with key internal and external stakeholders for the architectural design of the pensions dashboards service. To do this, we have spent time analysing the various options for the ecosystem to ensure that the candidate architecture, as described by DWP in the government’s response to the consultation, remains the right choice to deliver the pensions dashboards service.

We have continued to finesse the design of the digital architecture to ensure we develop a smooth and secure service for our end users and pensions providers/schemes. Our latest view of the architecture of the dashboard ecosystem is shared below.



**Key**

MaPS Dashboard - <b>MaPS</b>	Digital Architecture - <b>PDP</b>	Dashboards/Pension Providers and Schemes - <b>Industry</b>	State Pension - <b>DWP</b>	Ecosystem Governance Framework (technical, security, design, accessibility, performance and user experience standards) - <b>PDP to set and monitor</b>
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We have established a Digital Design Assurance Group chaired by the PDP Programme Director, comprising industry and government experts in digital technology and service design. The aim of this group is to provide assurance to the PDP that design solutions and changes to designs are fit for purpose and align with the design principles as set out in the government's consultation response and with the Government Digital Service standards. This group will meet regularly as the work of the programme progresses.



**We have established a Digital Design Assurance Group chaired by the PDP Programme Director, comprising of industry and government experts in digital technology and service design.**



### What's next?

- we will begin creating a governance strategy to allow the ecosystem to monitor and audit the components and participants involved in making pensions dashboards work. This will ensure adherence to standards and service levels required for the service to run smoothly

The strategy will cover:

- data standards provision
- technical interaction components standards
- service levels & obligations
- provision of clear on-boarding and change process for participants in the ecosystem
- ensure governance is aligned with policy and regulations to allow for enforcement when needed
- governance structure and operating model



### Find out more

- read the full [pensions dashboards feasibility report and consultation, and the Government's response](#)
- watch our short video about the [pensions dashboards ecosystem](#)
- find out more about the [Digital Design Assurance Group](#)

# 10 Preparing for procurement of the digital architecture and the identity service

## Digital architecture market engagement

In June, we undertook a Request for Information (RFI) pre-tender market engagement exercise with potential suppliers for the proposed digital architecture for the pensions dashboards ecosystem. The objective of this exercise was to:

- inform the marketplace of the future formal procurement opportunity
- encourage in advance supplier commercial partnership discussions
- ascertain whether there is enough competition to utilise one of the existing Crown Commercial Service (CCS) digital services framework agreements. This is the default (not mandatory) route to market for government procurement requirements
- identify the market positioning of suppliers
- identify existing technology components that could either meet or be built upon to meet our central architecture requirements

The RFI covered the pension finder service (including consent and authorisation) and governance register elements of the digital architecture, with the identity service being scoped under a separate market engagement exercise, which commenced in late October.

As part of the market engagement process, we issued a questionnaire for participants to complete and respond to a range of questions around the following themes:

- commercial
- service design
- security and assurance



As part of the market engagement process we issued a questionnaire for participants to complete and respond to a range of questions...



To provide interested parties with the opportunity to ask clarification questions, we hosted a webinar, with a panel consisting of members of the PDP senior leadership team. We had 75 individuals register to attend the webinar, with 59 of these participating on the day.

The market engagement process concluded at the end of July. A total of 18 suppliers submitted a response to the RFI questionnaire and the information has been collated and reviewed internally. The exercise did not indicate that there were any serious concerns from the market on any of the points we requested feedback on. There was evidence to suggest the optimum commercially attractive model would be to offer the market an outsourced design, develop and operate (run) contract. This information helped us to further identify that the CCS framework options will entail undertaking multiple procurement exercises to deliver the full pensions dashboards service.

We have used the information to develop and inform the commercial strategy, which includes the most suitable, commercially efficient, and compliant procurement route to market.

### What's next?

- we will publish a high-level summary of responses to the RFI questionnaire prior to commencing the formal competitive procurement exercise once the necessary approvals are in place
- we will finalise the commercial strategy and present the recommended route to market option to our governance fora for approvals to proceed with the competitive procurement exercise
- we will start preparation for and seek approval to undertake the competitive procurement exercise for the pension finder service, the consent and authorisation server and the governance register.

### Reviewing our options for the identity verification solution

A secure, effective and inclusive identity verification (IDV) service is a critical part of the pensions dashboards ecosystem.

We have been in the discovery phase over the summer, engaging with internal and external stakeholders to understand the challenges for the PDP. This has involved identifying the various options for consideration and what further work we need to inform the implementation of an ID solution for pensions dashboards.



**A secure, effective and inclusive Identity Verification (IDV) service is a critical part of the pensions dashboards ecosystem.**



We are working with the Government Digital Service (GDS), the Digital Identity Unit and Open Identity Exchange (OIX), all of which bring key insight to the ways that we can implement an identity service. Ongoing discussions with representatives from GDS and DWP Digital have, among other things, covered the overall approach to security, inclusion and accessibility and the possible IDV mechanism.

We have focused on defining concepts and challenges that must be validated with potential identity service providers, which will enable us to further refine our requirements. On 21 October, we initiated a market engagement exercise, which runs until 27 November 2020. This seeks to understand the identity verification supplier market and to validate identity providers' approaches to key challenges.

Additionally, in conjunction with OIX, we have undertaken a series of workshops to understand current trends in identity, review alternatives to a proposed standard and to look at specific challenges associated with attributes that would enable data providers to have greater confidence in matching requests to their membership. We will assess the outcomes of the workshops alongside responses to the market engagement to inform the next phases of analysis.

We have had some early engagement with pension providers and schemes (including DWP) to begin testing whether our approach to the identity solution, and

the standards that underpin it, provide the level of confidence needed to release pensions information to a dashboard user.

### What's next?

- we will refine and publish our thinking about what we can expect from a potential solution and help shape our proposal for an IDV service. This proposal will include the standards the service will work to and the architecture within which they sit
- we will undertake an informal market engagement exercise for the IDV service during November
- we expect to start preparation for and commence procurement of the required service(s) in Q1 2021



#### Find out more

- read more about our [market engagement exercise for the identity service](#)

# 11 Building our evidence base and establishing a user-centred approach

As pensions dashboards will have a broad set of users once implemented, it is critical that we understand and answer their needs by involving potential service users, their representatives and industry in helping us to shape our work. A user-centric approach is key to the development of pensions dashboards.

## Convening a Usability Working Group

We established the Usability Working Group (UWG) to gather and share key insight on user needs, with representatives from consumer bodies and potential dashboard providers.



**The key purpose of UWG is to ensure user input into the development of Pensions Dashboards.**



The key purpose of the UWG is to ensure user input into the development of pensions dashboards. The group will also help dashboard providers to develop simple to use and engaging pensions dashboards that meet user needs. The UWG is not a decision-making group, it will provide recommendations and ideas.

The objectives of the UWG are to:

- share and build evidence on user needs, primarily through user research, to ensure that pensions dashboards remain fit for purpose
- validate the information presented on the pensions dashboards to ensure it is clear and easy to understand

- validate the service design of pensions dashboards, including security standards and service levels
- gather input and develop a set of user experience guidelines to ensure standards and consistency between pensions dashboards
- enable user testing to ensure continuous user validation and feedback
- enable regulators and policymakers to obtain input and feedback on areas that require new or amended regulations and rules

## Developing a research and analysis plan

It is critical that everything the PDP does continues to be evidence-based and informed by an ongoing programme of robust research and analysis. We have developed a research and analysis plan to ensure that we continue to have the most up to date and complete evidence base on which to inform design decisions. The high-level objectives of this plan are to establish:

- what works in increasing engagement with pensions via dashboards
- the size and nature of the population who will be using dashboards
- the landscape of pension providers and schemes and pension entitlements
- the issues that may be faced by pension providers and schemes in providing data to be viewed on dashboards

- the motivations, attitudes and behaviours of users around engaging with pensions via dashboards
- the existing assumptions around user needs for dashboards

We will work with our delivery partners to ensure co-ordination of evidence gathering to maximise efficiency and minimise the burden on industry and others.

### Finalising requirements for rapid evidence review

The foundation for our research and analysis programme is an understanding of the existing evidence base, with a focus on what has worked in increasing people's engagement with pensions via dashboards. We are in the process of appointing a supplier to deliver a rapid evidence assessment (REA), which will explore the existing UK and international literature, enabling us to look at the totality of the evidence base and assess and identify any evidence gaps.

### Developing requirements for research agency procurement

We are undertaking procurement to appoint a research agency to support us to fill our priority evidence gaps over the course of the programme. This contract will help us to undertake a range of research projects, via a range of methodologies, to increase our understanding of the areas set out above, as well as any additional insight requirements that emerge.

### Qualitative research

The first insight project, commissioned at the start of 2020 by the PDP, was independent qualitative research with pension providers and schemes, to understand some of the discrete challenges that they will face when interacting with the dashboards ecosystem.

This work is a key input into the PDP's work on data standards and has been published alongside this report.

### What's next?

- we will explore existing data including from social surveys and administrative data, undertaking secondary analysis to elicit further insights
- where data is not available we will consider commissioning primary quantitative or qualitative research with users, providers and stakeholders to estimate prevalence of issues or understand perceptions and attitudes. All externally commissioned research and analysis will be published as soon as the work is completed, thereby building up the evidence base
- we will design a programme of user research and usability testing to ensure that any design decisions and standards meet the needs of users
- the UWG will meet regularly and explore a series of topics as outlined above



#### Find out more

- read more about the [Usability Working Group](#)

## 12 Engaging with industry and others on data standards

The key challenges relating to data for pensions dashboards are:

- **Find data** - digitally matching individuals to pension entitlement records
- **View data** - specifying the minimum information about each found pension that should be displayed for the individual to see on their chosen pensions dashboard

In April, we published our initial thinking on these key data issues, in two working papers on data scope and on data definitions.



**We convened a working group of large pension providers, schemes and administrators, spanning all sub-sectors of the pensions industry to begin looking at practical solutions to the various data challenges.**



We have since undertaken two significant stakeholder engagement activities, taking input from as wide a range as possible of diverse consumer and industry stakeholders, to develop, enhance, and ratify our data thinking.

### Call for Input

In July, we launched an eight week, industry-wide Call for Input on the two data working papers. To encourage broad input, we supported this request with two awareness raising webinars in May, hosted by the Pensions Management Institute (PMI) and the Society of Pensions

Professionals (SPP), and a further update webinar in August with one of our Steering Group members, Paddy Greene from Which?.

We received over 60 detailed and comprehensive responses to the Call for Input, from a wide range of consumer facing organisations, pensions industry bodies, as well as pensions providers, schemes and third party administrators. A summary of Call for Input responses has been published alongside this report.

### Data Working Group (DWG)

We convened a working group of large pension providers, schemes and administrators, spanning all sub-sectors of the pensions industry to begin looking at practical solutions to the various data challenges. The DWG met remotely five times through July and August to discuss options for meeting the find and view data challenges.

These discussions centred around the two data working papers and two key inputs:

### Independent qualitative research

We commissioned pensions data experts at PricewaterhouseCoopers (PwC) to undertake deep dive interviews during April and May, on the initial data thinking, with 15 anonymous pension providers, pension schemes and third party pensions administration firms.

### Ministerial letter

In June, the Minister for Pensions and Financial Inclusion, wrote to 30 of the UK's largest private pension providers, schemes and third party administrators, to help understand their readiness for and

approach to providing pensions information to people via dashboards. The responses reiterated the industry's continued overwhelming support for the PDP.

About half of the respondents expected to be able to have some of their data ready within 18 months of data (and other technical) standards being set. The vast majority of respondents were interested in discussing early participation (the provision of data). All respondents demonstrated a commitment to reviewing data quality, but also highlighted the need for trustee and sponsoring employer support. Respondents also highlighted other projects contiguous with dashboards, such as Guaranteed Minimum Pensions (GMP) Equalisation, and ongoing responses to Covid-19, requiring additional resource, capacity and funding.

### Engaging with potential integrated service providers (ISPs)

In tandem with our PDP Data Working Group activity, we have been engaging with a working group (established by Equiniti) of all the major pensions administration software providers, with coverage of approximately 60-70m pensions records. In due course, some of these providers may choose to make an integrated service provision (ISP) offer to their pension provider and scheme clients. This group initially met to discuss PDP's data thinking, match processes and what industry-standard approaches they could potentially adopt. We will work with this group as we move towards recruiting pension providers that are happy to connect to the pensions dashboards ecosystem on a voluntary basis, i.e. before the staged introduction of compulsion comes into force.

### What's next?

- we will publish a first set of data standards as a result of consolidating research findings, replies to the Minister's letter, Call for Input

responses, and DWG discussion ideas. The publication of the data standards will enable data providers to start assessing whether they have the data fields (as set out in the standards) in a digital format and the quality of that data

- we will set out in more detail our plans for refining the data standards in 2021 and beyond, for example, through extensive testing with users and pension providers

Phase three of the plan is an extended period when we will ask a range of different pension providers, schemes and administrators to connect to the pensions dashboards ecosystem on a voluntary basis, i.e. before staged compulsion comes into force.

- we will launch a process to recruit these in good time, led by our new Head of Onboarding



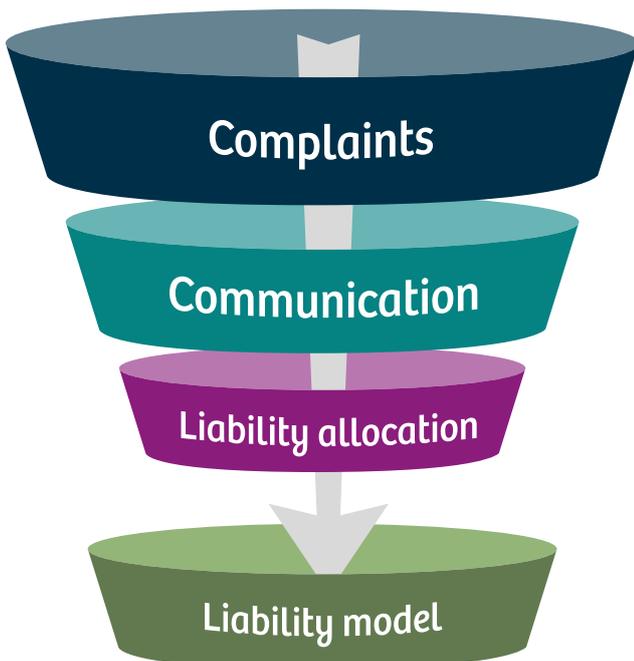
### Find out more

- read in full about our [Call for Input on the two data working papers](#)
- watch our two webinars hosted by the [Pensions Management Institute \(PMI\)](#) and the [Society of Pensions Professionals \(SPP\)](#)
- watch our [Call for Input webinar](#)
- read the [summary of Call for Input responses](#)
- read the full [qualitative research report by PwC](#)
- read more about the [Data Working Group](#)
- read our [blog post by Guy Opperman, Minister for Pensions and Financial Inclusion](#)

## 13 Developing the liability model

It is imperative for pensions savers and the credibility of pensions dashboards to, as far as possible, prevent things from going wrong, especially as the ecosystem will be handling personal and financial information. We're designing the pensions dashboards ecosystem to ensure the integrity of dashboards and protect users.

However, it is not possible to eliminate any risk to users as a result of their engagement with a pensions dashboard. Preparing for the possibility of things going wrong is critical to ensure we build dashboard credibility and encourage mass user participation.



Consumer protection is at the heart of everything we're doing. Users need to have confidence that ecosystem participants will act appropriately when things do go wrong.

The liability model will deliver the policy intent of ensuring dashboard users, dashboards, the ecosystem and pension providers are all clear what happens if things go wrong. It will establish the

protocols for how user complaints are made, assessed and dealt with. It will also cover how liability is shared between ecosystem participants.

It's important that we've developed a settled approach to our liability model, so that potential dashboard providers and technology partners understand the extent of their liability once they have joined the ecosystem.



**Consumer protection is at the heart of everything we're doing.**



We've developed provisional policy positions on what we think the key questions and answers are for a pensions dashboard liability model.

### What's next?

We are developing and refining the policy positions, which will sit at the heart of the liability model, with the help and input from our industry Steering Group and delivery partners.

## 14

## Communicating progress and engaging with stakeholders

In April, we published the first of our six monthly progress update reports on the Money and Pensions Service website. We also (with support from government delivery partners and key stakeholders) changed our name from the Industry Delivery Group to the Pensions Dashboards Programme, to reflect the fact that this significant programme of work is a collaboration between multiple delivery partners across government and industry. Industry does and will continue to play a critical role in making pensions dashboards a reality and is represented on the PDP Steering Group and via working groups.

In June, we launched the new, standalone PDP website, our LinkedIn and Twitter channels and our e-newsletter. To the end of September, on these channels we have:



**5.7k** visits received to website

**18k** page views



**6** blog posts published



**378** followers gained to LinkedIn

**27** posts made

**10.8k** total impressions



**18** publications uploaded



**255** followers gained to Twitter

**49** tweets sent

**19.9k** total impressions



**1,184** downloads of PDFs



**480** subscribers gained to our email newsletter

**47%** average open rate

**21%** click through rate

We have also produced the first in a series of explainer videos, to help clarify key aspects of the work of the PDP and have published our first video on our PDP website.

We recognise the importance of engaging with industry to raise the profile of the PDP, to demonstrate and communicate progress of the programme and to gain external input on key topics, such as data standards and the development of the digital architecture. To date we have:



**22** speaking engagements attended



**150+** participants attended in two hosted webinars

We meet regularly with our delivery partners: The Pensions Regulator, the Financial Conduct Authority and the Department for Work and Pensions to share plans and discuss opportunities for joint communications and engagement activities. We encourage our delivery partners to support our communications activity to help us amplify our messages.

### What's next?

- we have a rolling programme of communications planned, which includes regular activities such as a monthly email newsletter, a monthly blog post and social media activity. We will support key milestones such as the launch of the first version of the data standards and announcements regarding future procurement activities
- we will continue to develop and publish easily accessible content on key aspects of our work via the production of explainer videos
- we will develop and deploy a content and digital strategy for phase two of the website, which will consider the best way to create and deliver multi-channel content in a timely and engaging way
- we will commission stakeholder perception tracking research to assess the perceptions and communications requirements of our key stakeholders and will build these findings into our communication and engagement strategy

## 15 Glossary

Term	Definition
<b>compliance</b>	The process of supporting pension scheme providers to prepare for their legal duties to supply pensions information to the requisite standards and timetable; the process of monitoring that provision; and the process of enforcement should they not.
<b>compulsion</b>	To require in law that pension schemes make consumers' data available to them via their chosen dashboard.
<b>consent and authorisation service</b>	The consent and authorisation server manages a user's access permissions to enable a search of their pensions and retrieve their data. It also allows users to give and manage delegated access to others, such as independent financial advisers or Money and Pensions Service guidance specialists.
<b>dashboards available point (DAP)</b>	The DAP is the point at which it will be reasonable to make pensions dashboards available to all members of the public, meeting the first dashboards goal (" <i>connect people with all their pensions</i> ") for most individuals.
<b>data providers</b>	Occupational and personal pension schemes, administrators, Integrated Service Providers (ISPs), Department of Work and Pensions (state pension provider).  Pension schemes may choose to provide the data directly to the ecosystem, or via an ISP (an intermediary that will prepare and present the data on the pension scheme's behalf).
<b>data standards</b>	The pensions dashboards data standards will comprise a set of data items that define which elements of: <ul style="list-style-type: none"> <li>personal data to be shared within the digital architecture about a verified individual to unlock the ability to search pension records for a match</li> <li>an individual's pensions information that pension providers and schemes must provide to the individual (or their delegate) via a pensions dashboard</li> </ul>
<b>digital architecture</b>	The digital infrastructure that will enable multiple parties to connect within a secure ecosystem that delivers pensions dashboards for individuals. This includes a pensions finder service, identity verification service and a governance register.

<b>ecosystem governance framework</b>	<p>The set of rules around how the technical components will work together with dashboards and data providers. This includes all the associated technical connections and their operation in a live environment.</p> <p>The framework will include data, technical, security and performance standards as well as design, accessibility, and user experience standards that dashboards must meet to be connected to the digital architecture.</p> <p>The Pensions Dashboards Programme will also develop a clear and comprehensive complaints process for users in case something goes wrong and a clear liability model, which all parties are signed up to, with routes to redress.</p>
<b>estimated retirement income</b>	<p>An estimate of the income that an individual pension entitlement might itself provide or enable an individual to access.</p>
<b>governance register</b>	<p>The governance register is a technical service that provides assurances that the different elements of the ecosystem (dashboards, identity services, PFS and connections to pension schemes) meet the required standards to participate. It ensures that all these elements operate correctly and securely and allows access to be revoked if any party is found to be operating incorrectly, for example by misusing data. It will also enable compliance and monitoring of the system as a whole.</p>
<b>identity verification service</b>	<p>The PDP will need to agree a standardised level of identity verification, which set the levels of assurance required in line with the National Cyber Security Centre's Good Practice Guide 45.</p> <p>The identity service allows users to authenticate themselves (prove they are who they say they are) so that they can access other elements of the ecosystem. It provides the verification required to assure data providers that they are returning data to the correct user and no one else.</p>
<b>individuals</b>	<p>People who can use one of the dashboards to find and view their pensions.</p>
<b>industry</b>	<p>The wider pensions industry, which may be involved in dashboards in different ways. This includes private and public sector pension schemes of all types, financial technology firms, third party administrators, independent financial advisers, insurers and employee benefits platforms, among others. Other interested parties include banks, employers, consumer representative bodies and the voluntary sector.</p>

<p><b>integrated service provider</b></p>	<p>An integrated service provider (ISP) holds pension information securely on behalf of pension schemes.</p> <p>It makes pension information accessible via a dashboard when the pension scheme provider is unable to do so itself.</p> <p>These arrangements already exist and are contractual relationships between the two parties. These arrangements are outside of the scope of the ecosystem.</p>
<p><b>MaPS Dashboard</b></p>	<p>The Money and Pensions Service will develop a pensions dashboard (the MaPS dashboard) as part of its function to provide information and guidance on pensions.</p>
<p><b>pensions dashboards</b></p>	<p>Pensions dashboards are the public facing user interfaces that will enable individuals to access their pensions information online, securely and all in one place, thereby supporting better planning for retirement. Dashboards will provide clear and simple information about an individual's pension savings, including their State Pension. They will also help them to reconnect with any lost pension pots.</p>
<p><b>pensions dashboards ecosystem</b></p>	<p>Multiple parties, technical services and governance need to connect up, in what we are referring to as an ecosystem. This is made up of the supporting digital architecture which allows dashboards to work, the dashboards themselves which individuals interact with and the governance system which monitors the whole ecosystem.</p>
<p><b>Pensions Dashboards Programme (PDP)</b></p>	<p>The Money and Pensions Service (MaPS) set up the Pensions Dashboard Programme (formerly known as the Industry Delivery Group). It is responsible for developing the pensions dashboards digital architecture, which will enable individuals to view all their pensions data via their chosen dashboard within a secure ecosystem.</p> <p>The Pensions Dashboard Programme will not develop a front-end dashboard.</p>
<p><b>Pension Finder Service (pfs)</b></p>	<p>The Pension Finder Service (pfs) is a piece of technology that sends out an instruction to all data providers to search for a user's pensions. If a match is found, the location where the data can be found is returned to the user's chosen dashboard along with a key (a token ensuring secure access) which allows that dashboard to access the data and display it to the user.</p>

<b>regulators</b>	<p>The Financial Conduct Authority (FCA) and The Pensions Regulator (TPR), which work in tandem to address risks and harms in the pensions and retirement income sector. The organisations have different statutory remits set by Parliament.</p>
<b>staging</b>	<p>Pension scheme providers will connect to the ecosystem over a period of time rather than all at once. Schemes will be given a specific deadline date before which they must connect to the ecosystem.</p>
<b>Steering Group</b>	<p>The Pensions Dashboards Programme Steering Group is a collection of informed individuals from across the pensions industry, consumer associations and the pro-gramme itself.</p> <p>It represents the interests of consumers and stake-holders within the pensions, financial services and fintech sectors and provides strategic direction across a range of topics.</p> <p>It is responsible for informing the design and delivery of the pensions dashboards ecosystem and steering the work of the working groups. The Steering Group has a specific focus on representing, and building consensus amongst, the industry and consumers who will be in-volved in, and impacted by, the implementation and rollout of pensions dashboards.</p>
<b>working group (WG)</b>	<p>The pensions dashboards programme working groups are forums for our stakeholders, which bring together subject matter experts with relevant skills and practical expertise to input into the design, build and run of the whole pensions dashboards ecosystem.</p> <p>We will set up a working group for each significant workstream, to do the detailed analysis and options appraisal of key aspects of the programme and will seek direction from the steering group.</p>

