

PENSIONS DASHBOARDS A TO Z

A PLSA GUIDE FOR THE PENSIONS INDUSTRY AND
THE DECISIONS REQUIRED FOR INITIAL DASHBOARDS

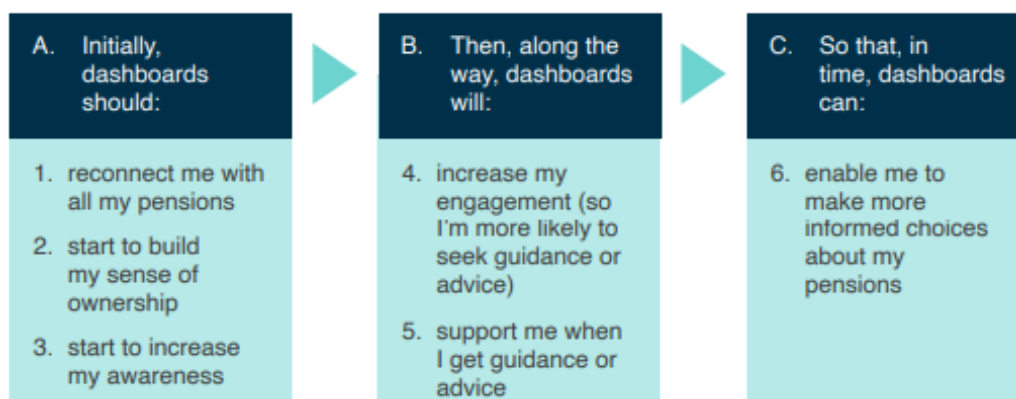


CONTENTS

INTRODUCTION	3
FULL ISSUES LIST	4
THE MOST CRITICAL ISSUES REQUIRING RESOLUTION	4
NEXT STEPS	5
APPENDIX 1 – SUMMARY LIST OF THE A TO Z DASHBOARDS ISSUES	6
CONSISTENT ECOSYSTEM “LAYERS”	6
SUMMARY TABLE OF ISSUES	7
APPENDIX 2 - FULL EXPLANATION OF THE A TO Z DASHBOARDS ISSUES	8
DISCLAIMER	17

INTRODUCTION

1. The PLSA strongly supports the idea of pensions dashboards. International evidence shows dashboards have the potential to dramatically improve peoples' awareness of their financial prospects by securely displaying information about their different pensions together in one place online.
2. However, successfully delivering UK dashboards presents some big challenges. As recently as November 2021, the [MaPS Departmental Review](#) report highlighted that: *"The Pensions Dashboards Programme (PDP) is complex; there are many ways in which it could fail"*.
3. The PLSA wants to contribute towards dashboards success. So in this paper, we have garnered together current industry evidence to clearly articulate the views of PLSA member pension schemes on the full list of key issues which must be resolved.
4. The focus of this paper is initial pensions dashboards – those that first will be made public after the new regime comes into force. But it should be remembered all parties fully anticipate the whole dashboards ecosystem will evolve and be modified over time, for example as set out by PDP in its first Progress Update Report in April 2020:



5. Future iterations will draw upon the ongoing live experience of many users of dashboards and thus continually improve how dashboards meet real savers' real needs on an enduring basis.
6. This paper is intended as a reference point for industry as we go into 2022. It reflects PLSA's current interpretation of Government's intent for initial dashboards. Many of the views were included in the July 2021 [PLSA Response to the PDP Call for Input on Staging](#).

FULL ISSUES LIST

7. There is a long list of important issues which must be resolved for initial dashboards success. **Appendix 1 is a summary table** of all these key issues, sequenced logically from the “top to the bottom” of the overall dashboards ecosystem. **Appendix 2 provides a detailed explanation** of each issue, in the same order.
8. But which are the most critical issues and topics on which industry needs urgent resolution? These are summarised below.

THE MOST CRITICAL ISSUES REQUIRING RESOLUTION

9. All 26 issues in the Appendices are important, but the most urgent (on which resolution and decisions are needed as soon as possible) fall in **seven key areas**, namely:
 - ▶ **Testing, and managing, savers’ understanding** (see issues D, E, F and G)
Extensive testing is needed with a wide variety of different savers, who have differing levels of financial awareness, that they understand the information they are seeing on dashboards, and are not confused by it. The testing should also analyse what users do after seeing their information. These detailed testing results are key in defining the display standards which all dashboards must always use.
 - ▶ **ISP technical connections with the digital architecture & dashboards** (issue J)
Schemes will be largely dependent on their incumbent administration and technology providers, or newly procured ones, to deliver their dashboards compliance. So all administrators and technology providers need to be able to see, and understand, published details of how they must connect with the central digital architecture, and with dashboards, including all necessary technical and security specifications and standards.
 - ▶ **Scheme’s continued GDPR compliance** (issue O)
Schemes need to be confident that, in complying with the dashboards compulsion requirements, they can continue to comply with all existing GDPR requirements. A clear statement of guidance on this by the Information Commissioner’s Office would be very helpful.
 - ▶ **Clarity on the liability regime** (issues P and T)
There are two separate liability aspects on which schemes need clarity: not found pensions, and pension amounts returned. If a scheme does not find a pension which they should (e.g. because personal data does not match perfectly), it will not appear on the user’s chosen dashboard. Separately, the pension amounts appearing on dashboards almost certainly won’t be how much is actually payable. Schemes need to have certainty on where legal financial responsibility will rest should users take action, or fail to take action, in light of i) their pensions not being shown and / or ii) the pension amounts they see.
 - ▶ **Definition of View data to be returned** (issues Q, R and S)
Schemes need certainty on the pension amount data to be returned after a pension is found, both accrued (and, if required, projected), across all scheme types (DB, DC, etc.). As well as the detailed definition of these amounts, schemes need to know a) how quickly their ISPs are required to return the required data when a user requests it, and b) how up-to-date the figures their ISPs return must be (in this document, we call this the “recency” of the data). Response times and recency could significantly impact how schemes and ISPs choose to implement their solutions.

▶ **Clarity on the timeline** (issues U and W)

Schemes need to know the window within which they must comply and the process for their onboarding to the dashboards ecosystem. Separately, schemes need to understand when Government intends to make pensions dashboards public (the Dashboards Availability Point or “DAP”) to be so they can plan their additional resources.

▶ **Regulation of data provision** (issue Y)

Schemes need to understand what principles or requirements will be adopted by the two respective regulators (TPR and FCA) for the dashboards compliance regimes.

10. The first wave of schemes stands ready to connect to the pensions dashboards ecosystem but, in order for them to do so successfully, they need clarity and **certainty** on all the above critical areas. In simple terms, schemes need to know:

- ▶ what they are required to do, for example what pension information they must return
- ▶ when they are required to do it, e.g. certainty on the staging window for each scheme
- ▶ how their suppliers must do it, e.g. all technical standards, such as APIs, and
- ▶ the liability being placed on schemes (in relation to information that is, and is not, returned for savers to view on their chosen dashboard).

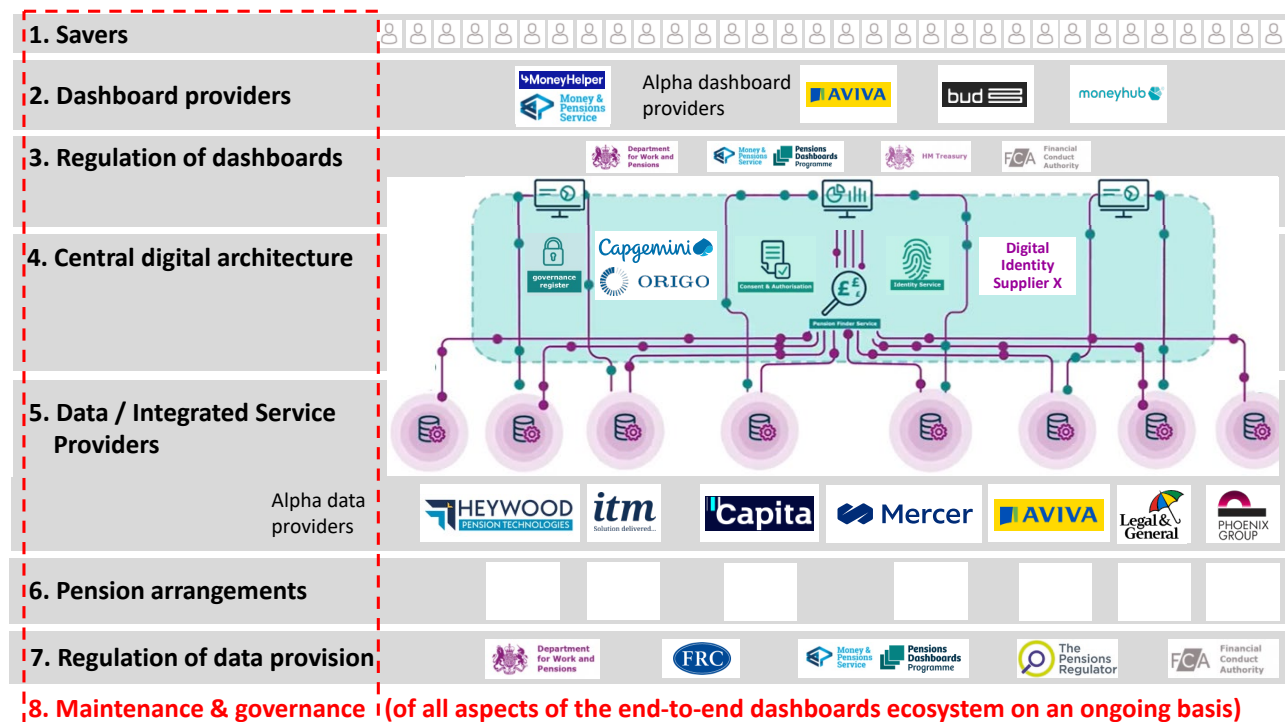
NEXT STEPS

11. There is clearly much that needs to be resolved in a short amount of time. Government, MaPS, PDP, regulators, administrators, technology providers, schemes and industry bodies must all work closely and collaboratively together to resolve these issues for initial dashboards success.
12. The PLSA looks forward to working with Government, and all other parties, during 2022, to help contribute to this success.

APPENDIX 1 – SUMMARY LIST OF THE A TO Z DASHBOARDS ISSUES

CONSISTENT ECOSYSTEM “LAYERS”

13. There are many different “moving parts” to the dashboards initiative, so for clarity of communications PLSA is now consistently referring to “layers” in the diagram below:



14. Thinking in this way means when, for example, we list all the key issues to be resolved, we consistently cover the topics in the **most logical “top to bottom” order of the ecosystem**, i.e.:

- ▶ **savers** (i.e. initially those with deferred and active UK pension entitlements), then
- ▶ the **dashboards** those savers will login to, then
- ▶ the **regulation of those dashboards**, then
- ▶ the **central digital architecture** (including the **central digital identity service**)
- ▶ the **provision of integrated service provider (ISP)** services to serve up the data
- ▶ the **pension arrangement (scheme and provider) actions** required to comply, and
- ▶ the **regulation of the compulsion requirements** on schemes and providers, and
- ▶ the **ongoing governance** of all aspects of the end-to-end dashboards ecosystem.

15. The summary table of issues for the pensions industry below is sequenced in this logical order.

SUMMARY TABLE OF ISSUES

ECOSYSTEM LAYER	SUMMARY OF ISSUES	PRIMARY OWNERSHIP	CRITICALITY / URGENCY
("top to bottom")	(see Appendix 2 for full explanations)	for resolution	of resolution from schemes' perspective
Savers	A. Making savers aware of dashboards	All parties	Low
	B. Managing savers' expectations	DWP, PDP	Low
	C. Building savers' confidence in security	PDP Alpha / Beta	Low
	D. Testing savers' understanding	PDP Alpha / Beta	High
	E. Learning what savers do next	PDP Alpha / Beta and TPR / FCA	High
Dashboard providers and regulation	F. Display standards and regulation	PDP / FCA	High
	G. Dashboards caveat standards	PDP Alpha / Beta	High
	H. Dashboards technical operations	PDP Alpha / Beta	Medium
Central digital Architecture (DA)	I. Digital identity level of confidence	PDP	Medium
	<i>[Other Digital Architecture issues may emerge during Alpha build and test]</i>		
Data / Integrated Service Providers	J. ISP technical connections	PDP, ISPs	High
	K. Development of ISP services	ISPs, Schemes	Medium
	L. Acceptability of ISP contracts	ISPs / Schemes	Medium
Pension schemes and providers	M. Personal data matching processes	Schemes / ISPs	High
	N. Maybe match processes	PDP Alpha / Beta	Medium
	O. Continued GDPR compliance	PDP Alpha/Beta	Medium
	P. Liability for not finding pensions	DWP	High
	Q. Definition of View data to be returned	DWP	High
	R. View data response times	DWP	High
	S. Recency of View data	DWP	High
	T. Liability for the View data returned	DWP	High
	U. Staging windows and onboarding	DWP	High
	V. Scheme-specific preparations	Schemes / ISPs	High
	W. Dashboards Available Point (DAP)	DWP	High
	X. Post-DAP increase in admin demand	TPAs/Schemes	Medium
Regulation of data provision	Y. Regulation of data provision	TPR / FCA	High
Maintenance and governance	Z. Ongoing governance of the entire end-to-end dashboards ecosystem	PDP, but with input from all parties	High

APPENDIX 2 - FULL EXPLANATION OF THE A TO Z DASHBOARDS ISSUES

16. The table below provides a full explanation of each of the issues.

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
A. Making savers aware of dashboards	<p>A clear strategy, and a detailed plan, for the launch and public communication of dashboards are needed, especially around the Dashboards Available Point (DAP).</p> <p>Key points which the overall launch strategy and detailed launch plan must address include:</p> <ul style="list-style-type: none"> ▶ Performance issues reflective of the DAP launch timing ▶ Savers' expectations of what they will be able to a) see and b) do ▶ Impacts on schemes (see increase in admin demand below). <p>Who is responsible: Co-ordinated and coherent joint-effort between the media, Government, consumer bodies and the pensions industry.</p>
B. Managing savers' expectations of what initial dashboards offer	<p>MaPS research shows, once they are aware of dashboards, savers will have high expectations of what they will be able to do. These expectations need to be actively managed because of the limits on the content and functionality of initial dashboards. Initial dashboards are expected to:</p> <ul style="list-style-type: none"> ▶ Find some, but not all, pensions and savers need to understand this (even after the end of the 2-year staging window, coverage won't be 100%, e.g. micro schemes, "maybe matches", pensions in payment, etc.). ▶ Present the pensions clearly, simply, in everyday language ▶ Provide click-throughs to each of a savers' pension schemes. <p>But users of initial dashboards will probably not be able to:</p> <ul style="list-style-type: none"> ▶ See their pensions in payment / drawdown ▶ See accurate pension income amounts, only estimates (for accurate retirement quotations, savers must contact schemes) ▶ See comparable state, DB and DC pension incomes, so totalling (which we know savers will do in their heads) might not be valid ▶ Understand their progress towards an income target (e.g. the PLSA's Retirement Living Standards) ▶ Model different scenarios, for example different future contributions, retirement ages, retirement options, etc. ▶ Execute any choices such as contributing more, consolidating pensions, switching DC investments – for these, and all other, actions, savers must contact their schemes directly. <p>MaPS research shows savers want all the above functionality, but it will not be possible to include all these elements in initial dashboards. So users need to be informed if and when this additional data and additional functionality will be coming onstream, as well as what they can do to meet these user needs in the interim period (for example, by re-keying their pension data into a standalone modeller).</p> <p>Who is responsible: DWP, PDP</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
C. Building savers' confidence in the security of their data and that they are being protected at all times	<p>Everything about savers' experience using initial dashboards must build their confidence that their data is being kept secure and their interests are being protected.</p> <p>PDP published research shows the three key things consumers want to be sure of, in this regard, are that:</p> <ul style="list-style-type: none"> ▶ security is assured, throughout the end-to-end ecosystem ▶ selling is not allowed, neither by providers nor by other actors ▶ sense can be made of the information they see on their chosen pensions dashboard, and they will not be overwhelmed by it (see issue D "Testing savers' understanding" below). <p>To help build this saver confidence, prior to the launch of initial dashboards, we recommend that all relevant parts of Government should publish clear details of all the protections being put in place to protect consumers on dashboards.</p> <p>Who is responsible: DWP, HMT, FCA, MaPS Dashboard, Other Dashboard Providers, PDP, ISPs.</p>
D. Testing savers' understanding of the pension information they see on initial pensions dashboards	<p>Before initial dashboards are launched, there must be thorough testing, with a wide variety of different savers with different levels of financial awareness, that they can understand the pension information they are seeing on dashboards and are not overwhelmed by it.</p> <p>Dashboard display standards (see issue E below) must be iteratively simplified, and simplified again, until savers' understanding is reached, and confirmed by testing with multiple savers.</p> <p>This is a very major challenge. As PLSA said in its July 2021 Response to the PDP Staging Call for Input: "<i>Numerous PLSA member schemes feel that, given the history and complexity of numerous layers of UK pensions legislation, legal judgements and the consequent variety of scheme designs, it may never be possible to arrive at [DWP's ambition of] a 'cohesive and easily understandable view'.</i>"</p> <p>PLSA member schemes need to know how the pension income amounts they provide will be displayed to dashboard users, along with all the user's other pensions from their other schemes and providers. Schemes also want to be assured that the display has been thoroughly user tested and users understand the display.</p> <p>See issue F. "Display standards" for some specific complexities.</p> <p>Who is responsible: MaPS Dashboard, Other Dashboard Providers, PDP, Schemes / Providers.</p>
E. Learning, and managing, what savers do next	<p>The extensive testing of initial dashboards prior to launch should include a detailed analysis of what users do next (which may, or may not, be based on their proper understanding of the pension information they have just seen on their chosen dashboard). When these "saver next steps" have been properly understood, mitigating measures must be put in place to promote good outcomes and prevent bad choices being made by savers.</p> <p>Scheme designs and options have a wide variety of underlying complexities which it will never be possible to fully represent on dashboards, such as multiple tranches, underpins, steps ups, early and late retirement options, and so on. Dashboards will therefore show estimated figures rather than definitive retirement quotation figures which would be payable in any particular retirement scenario.</p> <p>Users must be helped to understand this, i.e. that retirement income figures they see on dashboards can only ever be estimates.</p> <p>For definitive retirement income figures, users must contact their schemes directly. This is a key reason click-throughs are so important, enabling a saver to go straight from their chosen dashboard to their schemes' / providers' websites so they can request additional / accurate information about their pensions.</p> <p>As a result of these click-throughs, pensions administrators and providers are anticipating a potentially significant uptick in admin demand (see Issue X below for more on this).</p> <p>Who is responsible: FCA, MaPS Dashboard, PDP, Schemes.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
F. Dashboards display standards and regulation	<p>Dashboards display standards must be developed which fully reflect the extensive testing of savers' understanding of all their different pension information and the learnings about what savers do next.</p> <p>First and foremost, display standards must require dashboards to be clear, simple and only use everyday language. They must also ensure users that understand:</p> <ul style="list-style-type: none"> ▶ not all their pensions may be shown ▶ all retirement income figures are estimates and not accurate quotations (as explained under Issue E above) ▶ pension incomes may not be comparable and therefore ▶ totalling of the different incomes may be inappropriate ▶ there is much greater complexity to each pension than is shown on dashboards (for example, tranches, steps ups, early retirement bases, different retirement options, cash options, etc.) <p>It must also be clear how providers of dashboards are being held to these standards at all times (e.g. through FCA monitoring).</p> <p>Who is responsible: FCA, MaPS Dashboard, Other Dashboard Providers, PDP, Schemes / Providers.</p>
G. Dashboards caveat standards	<p>Schemes need to know that their pension figures will be appropriately caveated, e.g. that all figures are estimates not accurate quotations, that more complexity exists than is shown on a dashboard, etc.</p> <p>If dashboard displays are not appropriately caveated, some PLSA member schemes have suggested their trustees may wish to issue communications to their members explaining that figures on dashboards should not be considered as an accurate indication of the benefits provided. Scheme's benefit statements very often contain extensive explanatory comments accompanying the figures, detailing for example the further complexities which exist.</p> <p>On this point, PLSA schemes feel much will depend on where legal financial responsibility finally rests should an individual take action, or fail to take action, due to the information displayed, or not displayed, on a pensions dashboard.</p> <p>To ensure public confidence in pensions dashboards it's critical that this caveating / liability point is properly resolved prior to the launch of initial dashboards (see Issues P and T below for more on this).</p> <p>Who is responsible: FCA, MaPS Dashboards, Other Dashboard Providers, PDP, Schemes.</p>
H. Dashboards technical operations with the central digital architecture, ensuring that no data is persisted at any point within the ecosystem	<p>Schemes need to have confidence in the technical and security standards deployed for the operation of dashboards with the central architecture (e.g. the Consent & Authorisation Service for users to manage their consent, and the Governance Register to prevent bad actors being allowed to connect to the ecosystem, etc.).</p> <p>Detailed technical specifications for all application programming interfaces (APIs) between dashboards and the central architecture need to be published so they can be scrutinised and their testing understood.</p> <p>Schemes also need confidence that, in accordance with the April 2019 DWP design principle 166h), no pension data is persisted anywhere within the ecosystem (beyond the temporary caching of data by dashboards).</p> <p>Who is responsible: MaPS Dashboard, Other Dashboard Providers, PDP.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
I. Digital identity level of confidence / assurance provided by the central digital identity service	<p>Once the central digital identity service has been procured and deployed, schemes need to have a good understanding of the level of confidence (LoC)/ assurance (LoA) that is being placed in the digital identities provided to pension schemes (or their ISPs) by the digital identity service.</p> <p>Before they attempt any data matching, schemes (or their ISPs) receiving personal data attributes from the central digital architecture (such as Surname, Date of Birth, etc.) need to have strong confidence that these belong to a dashboard user who is who they say they are.</p> <p>A further crucial aspect is that, when PDP's interim digital identity service provider is replaced, as currently proposed, by the Government's future UK Digital Identity Attributes and Trust (DIAT) framework (currently targeted for 2024), there is no loss of continuity in the LoC / LoA being assigned to digital identities provided by the central digital architecture.</p> <p>Who is responsible: PDP.</p>
Important Note regarding the central digital architecture	<p><i>There are numerous other digital architecture focused issues, for example proving the internal interoperability of all the separate components within the architecture.</i></p> <p><i>These more technical "behind the scenes" issues may be of less interest to schemes, so they are currently omitted from this list. However, this should be reviewed as the alpha dashboards ecosystem is built and tested during the first half of 2022.</i></p>
J. ISP technical connections with the central digital architecture and dashboards	<p>All necessary technical and security specifications and standards between the central digital architecture and ISPs, and between dashboards and ISPs, must be developed and published so all pension administrators, pension providers and pension technology providers can easily adopt them.</p> <p>Schemes will be largely dependent on their incumbent administration and technology providers to deliver their compliance with the compulsion legislation. So all administrators and technology providers need to be able to understand how to connect with the central digital architecture.</p> <p>Detailed technical specifications for all application programming interfaces (APIs) between central architecture and ISPs, and between dashboards and ISPs, need to be published so they can be scrutinised and understood.</p> <p>One key aspect this will inform is the frequency of data refreshes from production administration systems to the ISP services which are connected with the ecosystem.</p> <p>Clearly, the current alpha development phase will be key to this. All relevant learnings from the seven alpha data providers, and subsequent beta data providers, must be published for reference by the whole industry as quickly as possible.</p> <p>PDP must also provide appropriate support to administration and technology providers as they test their connections with the ecosystem.</p> <p>Who is responsible: PDP, ISPs (Alpha Data Providers in the first instance).</p>
K. Development of ISP services	<p>Once the technical ISP connections have been understood, schemes need to know that they will be able to procure ISP services - most likely from their incumbent administration and technology providers.</p> <p>No organisations are yet offering ISP services, or have even defined in detail what those services are. As just one small example: what will be the optimal periodicity of the data refresh from the production administration system to the ISP system connected with the dashboards ecosystem? Nightly, weekly, monthly? What are the pros and cons for schemes of the different refresh options?</p> <p>A full-service specification for ISP services needs to be developed, which could potentially be an industry-standard.</p> <p>Where a scheme's incumbent provider(s) decides not to offer ISP services, or where the provider's price or lack of capacity prohibits them offering ISP services to a particular scheme, the scheme will require support to undertake a rapid procurement exercise for an ISP in an immature and time-constrained market.</p> <p>Who is responsible: ISPs, Schemes.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
L. Acceptability of ISP contracts and commercials	<p>A key element of a scheme's decision on who should provide their ISP services will be the ISP contract terms, in particular commercial terms such as price. Schemes need to understand the price and other terms of ISP services before they can confirm who will be their ISP (or ISPs).</p> <p>Whilst many schemes are assuming their incumbent administration and technology providers will also become their ISP, they do not yet know what the contractual and commercial terms will be. And some incumbent providers may not wish to make a commercial commitment until they have more certainty on the technical requirements to be placed on them (probably following the alpha, or even beta, test phase). Industry-standard ISP contract terms could potentially be developed, but it is likely that ISPs will be very different so that may not be appropriate, desirable or possible.</p> <p>Strategic "Multiple ISP" decisions: It is very common for PLSA members to have a DB scheme closed to future accrual and an open DC arrangement. Very often these are administered by completely different providers. Another example is AVC provision. Many organisations' holistic "Multiple ISP" decisions will likely involve contracting with multiple ISPs or having one overarching ISP, across their overall pensions provision. ISPs may not offer exactly the same ISP services, with potential knock-on impacts on members' experience of using dashboards.</p> <p>Who is responsible: ISPs, Schemes / Providers.</p>
M. Personal data matching processes including find response times	<p>Schemes need help with deciding what personal data elements they should instruct their ISP to match on. They also need to understand the response time within which their ISP is required to confirm: "Yes, we have a pension" (i.e. the find response, not the subsequent return of pension information).</p> <p>To help schemes with this decision, PASA has developed Guidance, supported by the PLSA, the ABI, both regulators, and a dozen or so leading providers of pensions administration software. The first iteration of this Data Matching Convention (DMC) Guidance was published in December 2021.</p> <p>Schemes' decisions on what data elements to match on need to be taken in the context of the known accuracy (not just presence or reasonableness) of their schemes' personal data elements (such as Surname, Date of Birth (DOB), National Insurance Number (NINO)) which they hold for all of their deferred and active members.</p> <p>Schemes will likely need to investigate the accuracy of this data, and undertake improvement activities.</p> <p>Finally, schemes need to understand the response time within which their ISP is required to confirm: "Yes, we have a pension" (i.e. the find response, not the subsequent return of pension information). If ISPs adopt more sophisticated matching routines, will this have an impact on performance and therefore their find response time?</p> <p>Who is responsible: ISPs, Schemes / Providers, TPAs, Data Specialists.</p>
N. Maybe match and personal data correction processes	<p>Schemes need to understand what to do for "maybe matches", for example where NINO and DOB match, but Surname doesn't. This is just one example: there will be many, many flavours of "maybe".</p> <p>Risk-averse schemes may wish to set a "high bar" for matching, for example only saying "Yes, we have a pension" where Surname, DOB and NINO all match perfectly. However, this could lead to several pensions not being found, e.g. if a deferred member has married but failed to notify the scheme of their new Surname. (Previous Surname being provided by the central architecture could potentially help mitigate this particular matching issue.)</p> <p>In these "maybe match" circumstances, schemes may wish to say: "We may have a pension for you, please contact us directly". The individual could then make contact with the scheme directly, provide evidence of their new Surname through normal data maintenance procedures, enabling their pension to then be digitally found when they next use a dashboard.</p> <p>Such "maybe responses" to dashboards find requests need to be carefully developed and tested with a particular focus on fraud prevention.</p> <p>Following the beta testing phase, with real rather than synthetic personal data, it is likely that a second iteration of the PASA DMC Guidance noted above will need to be published during 2022, covering what steps schemes could consider in relation to "maybe matches" (but see Issue P on Liability below).</p> <p>Who is responsible: PDP, ISPs, Schemes / Providers, TPAs.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
O. Continued GDPR compliance	<p>Schemes need to be reassured that, in complying with the dashboards compulsion requirements, they are also continuing to comply with all existing overarching GDPR requirements.</p> <p>The precise interaction of the new dashboards compulsion legislation and existing data protection law is not yet clear. Understanding this fully will be critical before any schemes can start meeting their dashboards compulsion duties. In some circumstances, scheme rules changes may potentially be needed.</p> <p>As an example, consider again the circumstance where NINO and DOB match but Surname does not. If a scheme does not say “Yes, we have a pension” (because they are not comfortable saying that unless they make a perfect match on NINO, DOB and Surname), are they still complying with the GDPR subject access requirement? In all likelihood, the scheme does have a pension for this dashboard user (because NINO and DOB match), but the scheme has not said a digital “Yes”, because Surname did not match.</p> <p>Who is liable for this pension not being found? (see Issue P below).</p> <p>A clear statement of guidance on this from the Information Commissioner’s Office (ICO) would be very helpful.</p> <p>Industry-wide guidance may be helpful for a scheme’s ongoing monitoring and oversight of its dashboards activity, for example monitoring its Find rate and GDPR compliance, potentially measured against industry best practice.</p> <p>Who is responsible: ICO, TPR, FCA, Schemes / Providers.</p>
P. Liability for not finding pensions	<p>If a scheme does not find a pension which they should (e.g. because personal data does not match perfectly), it will not appear on the user’s chosen dashboard. Schemes need to have certainty where legal financial responsibility will rest should the user take action, or fail to take action, in light of their pension not being shown.</p> <p>For example, consider an old, deferred DB pension not being found. The user’s total pension income will be understated, so the user may therefore decide to increase contributions to their current active DC arrangement. When they eventually reach retirement, and their old DB scheme does locate them (through existing paper-based tracing methods), the saver may realise they needn’t have topped up their active DC pension by as much as they have in order to reach their target retirement income, and they wouldn’t have done this had their old DB pension been shown on the dashboard. If the saver makes a complaint on this, saying their DB pension should’ve been displayed when they accessed a dashboard, who is liable in this situation?</p> <p>The above is just one example where liability for pensions not being found needs to be thoroughly worked through and understood.</p> <p>Who is responsible: DWP, Schemes, Legal Advisers.</p>
Q. Definition of View data to be returned	<p>The draft dashboards regulations due to be published shortly will provide more certainty on the View data content to be returned after a pension is found. But only after the public consultation on these draft regulations, and Parliamentary approval of the final regulations, will there be complete certainty.</p> <p>And even once the final regulations are settled in the autumn of 2022, we can be absolutely sure from the international experience of developing dashboards that the data requirements will need to be refined and finessed quite soon in light of live usage experience.</p> <p>The regulations therefore need to find the right balance between defining a clear framework for what is required, with the detail being able to be refined in light of future live testing and experience. So there needs to be nimble, yet controlled, ongoing governance of all ecosystem changes (see Issue Z on Ongoing governance below).</p> <p>Who is responsible: DWP.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
R. View data response times	<p>Schemes need to know how quickly their ISPs are required to return the prescribed View data, when a user requests it from their chosen dashboard.</p> <p>The draft regulations are expected to prescribe response times. Alongside the recency requirements (see S below), these response times could significantly impact strategic technology decisions. For example, should a scheme deploy an annual bulk process to update all pensions for all members, or a run-time calculation routine which is only executed for individual members when they use a dashboard? The user acceptability of all response times should, of course, be thoroughly tested with savers before initial dashboards are launched.</p> <p>Who is responsible: DWP, Schemes, TPAs, ISPs.</p>
S. Recency of View data	<p>Schemes need to understand how recent the figures their ISPs return must be. For example, can a pension income figure be 11 months out of date?</p> <p>Schemes need to consider Issues Q, R & S together. Only once schemes understand Q. what specific data elements are required, R. how quickly they must be returned, and S. how up-to-date the figures must be, will they be able to determine their data calculation strategies for returning data to dashboards.</p> <p>Who is responsible: DWP.</p>
T. Liability for the View data returned	<p>Because of the estimated nature of retirement incomes shown (see Issue E above), it would be helpful if the dashboards regulations put beyond doubt that no display of a retirement income on a dashboard creates any right or expectation to that pension amount for an individual.</p> <p>In other words, no valid claim should be able to be made in the future that a pension actually paid is different from an amount that appeared on a dashboard in the past.</p> <p>Schemes also need to know where legal financial responsibility will rest should an individual take action, or fail to take action, due to information displayed, or not displayed, on a dashboard?</p> <p>Who is responsible: DWP.</p>
U. Staging windows and onboarding process	<p>Schemes needs to know the window within which they must comply and the process for onboarding to the dashboards ecosystem. The draft dashboards regulations due to be published shortly are expected to prescribe a staging window for each scheme, but onboarding processes won't be known and bedded in until after alpha testing.</p> <p>Confirmation of staging windows in the draft regulations will be helpful, but PLSA member schemes will only be able to properly estimate how long it will take them and their ISPs to prepare (and therefore whether they will be able to comply within their prescribed staging window) once they are more certain of many of the topics set out above, including: K. provision of ISP services, M. personal data matching and accuracy, Q. View data requirements including R. response times and S. recency, and the questions of liability (P&T).</p> <p>Schemes may wish to have a period of live running between staging and the Dashboards Available Point (DAP) during which they can ensure connections, matching and View data returns are working correctly.</p> <p>Depending on scheme's specific circumstances, they may also wish to understand how they can connect legally before their staging window.</p> <p>Who is responsible: DWP.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
V. Scheme-specific preparations	<p>Once they know the actual dates for their specific staging window, schemes can start to step up their preparations.</p> <p>Actions required include (not necessarily an exhaustive list):</p> <ul style="list-style-type: none"> ▶ understanding how dashboards will display and caveat their data ▶ understanding the LoC / LoA of the digital identity ▶ selecting and contracting with (possibly multiple) ISPs ▶ choosing a personal data matching basis (or bases across ISPs) ▶ investigating and improving the accuracy of personal data ▶ understanding the View data, including recency & response times ▶ ensuring View data requirements can be met ▶ testing ISPs' connection of the scheme with the ecosystem ▶ building appropriate click-through landing pages ▶ deciding how to communicate the launch of dashboards to members, particularly around the Dashboards Available Point (DAP) (see Issue W below) ▶ preparing for the potential uptick in admin demand (X below). <p>Who is responsible: Schemes / Providers, TPAs, ISPs.</p>
W. Dashboards Available Point (DAP)	<p>Separately to their own specific staging window, schemes need to understand when Government intends for the DAP to be.</p> <p>Schemes need to determine, and implement, their own launch strategy and communications aligned to wider Government communications. Crucially, these communications need to proactively manage the anticipated uptick in administration demand from members (see Issue X below).</p> <p>Schemes then need to implement the communications from the DAP.</p> <p>Who is responsible: DWP</p>
X. Post-DAP increase in admin demand, and visits to click-through landing pages	<p>Schemes are anticipating a potentially significant uptick in administration demand as a result of the launch of dashboards.</p> <p>This will most likely occur once dashboards are publicly launched from the DAP. The uptick has at least three different dimensions:</p> <ul style="list-style-type: none"> ▶ Maybe matches: Dashboard users may receive “maybe responses” so there could be a big increase in the number of people contacting the scheme/TPA, to potentially correct their personal data, so that their pension can be digitally found. ▶ Requests for accurate retirement, and other, quotations: We know from international dashboards usage, that usage peaks in the year before a saver's retirement, so it is likely that, having found their pensions, many savers will wish to contact the scheme/TPA directly to request accurate retirement quotation figures. Alternatively, they may request other figures from the scheme/TPA, such as transfer value quotations. ▶ Other requests: From experience of bulk mailings to members, we know there will be numerous other reasons why users want to contact their schemes having been re-connected via a dashboard. <p>When dashboard users click-through to the scheme's website, they need to be sent to a suitable landing page which efficiently addresses the majority of users' various different needs.</p> <p>Who is responsible: TPAs, Schemes / Providers.</p>

ISSUE TOPIC	WHAT INDUSTRY NEEDS TO ENSURE INITIAL DASHBOARDS SUCCESS
Y. Regulation of data provision	<p>Pension schemes and providers need to understand what principles or requirements will be adopted by the two respective regulators (TPR and FCA) for the dashboards compliance regimes.</p> <p>Questions include (not an exhaustive list): What will be the criteria by which schemes will be required to prove they are complying? What onboarding testing cycle(s) will be required? Will there be benchmarking for industry best practice for onboarding?</p> <p>Who is responsible: TPR / FCA.</p>
Z. Ongoing governance of the entire end-to-end dashboards ecosystem	<p>The initial dashboards ecosystem will not be static, so schemes need to understand the ways in which it could change, and the governance of these changes.</p> <p>There are many different components to the ecosystem, including: dashboards display standards, API technical specifications, personal data matching rules, “maybe match” processes, View data requirements including response times and recency, and so on.</p> <p>Any and all of these components might need to be refined / finessed in light of live experience. In fact, we can be absolutely sure, in light of the live usage of international dashboards, that there will need to be post-DAP refinements.</p> <p>All these changes, whether short-term finessing or long-term enhancements, were signalled in the June 2021 PDP rapid evidence research report by the Behavioural Insights Team (BIT) which recognised that continual iteration of the ecosystem will be key, as opposed to a “set and forget” approach.</p> <p>The ongoing governance of all these changes must be nimble yet controlled. For each of the components of the ecosystem, a RACI matrix needs to be developed and agreed by all stakeholders, with industry having meaningful involvement in this ongoing governance process.</p> <p>These ongoing governance processes are expected to be a core element of PDP’s Target Operating Model (TOM).</p> <p>Who is responsible (to define): Government and industry, in collaboration.</p>

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