PENSIONS AND LIFETIME SAVINGS ASSOCIATION

PLSA RESPONSE: DASHBOARDS STANDARDS CONSULTATION

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EXECUTIVE SUMMARY

The PLSA welcomes the Pensions Dashboards Standards and the extra clarity that they give. We would have preferred them to have been developed after extensive user testing, with real connected pension schemes, to achieve balance between a good, comprehensible user experience and what is technically feasible and not onerous to data providers.

User Testing

Extensive user testing is needed in respect of service expectations and user comprehension, to feed into the standards. We would expect that future iterations would be informed by user testing.

Integrated Service Providers (ISPs) Market

Many of our members will be using an ISP to connect to the dashboards and they would like to hear their views to be confident in the standards. In particular, there are still many elements of the lower-level design that are not finalised. For Cohort 1(a), not having finalised standards until late 2022 could place a significant risk of schemes' ability to implement a solution in a controlled fashion.

Iterative Process

Our members accept that there will be more iterations of the standards in the initial phase of the dashboards ecosystem, but it is important that from the Dashboards Availability Point that there is a stability of standards, with changes to standards taking place only twice per year, avoiding busy periods and with at least 6 months' notice.

Commercial QPDS

It is important that the Design standards restrict opportunities to sell to dashboard users or monetise data. The PLSA would like to see the QPDS material that accompanies pension dashboards restricted to guidance for users and technical material. Many of our members are also keen that exporting of data does not take place, to prevent mis-selling and pension scams, whilst others feel it is inevitable but must have sensible consumer protections to avoid tight integration with sales channels

Response Times

Our members are most concerned about the less than 2 seconds response time stipulated in the Code of Connection. 10 seconds would build in time for systems freezing for a couple of seconds and for those who wish to make real time calculations to do so. This would need to be user tested to understand what an acceptable overall level of service is.

Possible Matches

In the initial stages of dashboards, possible matches may be significant in number. The current set of standards have gaps in how the Pension Identifier (PeI)* will be handled for possible matches to allow contact/administration centres the ability to resolve them. It is also important that when a

possible match is resolved as a negative match that it doesn't reappear as a possible match at some later date.

* The response to a Find Request where a data provider makes a match is an encrypted Pension Identifier (PeI).

Warnings

Warnings need to be balanced to not overload the users and give enough information so that they know if there is a need to contact their scheme or not before making informed decisions.

Disclaimer Wording

Disclaimer wording needs to make clear that values are indicative, limit liability of schemes and providers and direct users to their schemes and providers for all of the pension information prior to making any decisions about their pensions.

Platforms

The design standards need to be able to work on multiple platforms include desktop, smart phones, and tablets.

AVCs

The interlinking of DB Schemes and AVCs needs further thought in respect of the standards. ERI and accrued income data for AVCs that are designed to maximise tax free cash could be misleading on pensions dashboards. There are also concerns in respect of a misalignment of matching criteria between schemes and AVC providers which might mean that one scheme is shown and not the other.

Small Pots

More consideration needs to be given to pot sizes under £2,000 where SMPIs tend to round down income figures to zero. This may be a counterproductive experience for the user, and thought may need to be given to a warning that explains the income is less than £100 rather than present a zero figure for ERI and accrued income.

Reporting Requirements

The reporting requirements appear to be too onerous for data providers. They seek real time data on a daily basis without any explanation of why this is necessary. A costs benefits analysis would help our members to understand whether these requirements are feasible and what risks they are seeking to mitigate.

Security

We welcome the robustness of the security requirements but would have liked to be reassured on the compatibility of TLS 1.3 for most ISPs and schemes connecting directly to the ecosystem, based on National Cyber Security Centre guidance.

Connection and Early Connection

Our members are clear and broadly agree with the procedures around connecting directly, connecting through a third party and early connection.

INTRODUCTION

The PLSA welcomes the continued clarity and progress towards creating an ecosystem for pensions dashboards, that the PDP's standards create.

The breadth and depth of the content of the standards means that they touch upon different technical disciplines amongst pension schemes and providers. It is disappointing that PDP, having chosen the Summer to consult, did not consider at least an 8-week consultation period to give organisations more time to work across departments/teams and give fuller feedback in certain areas.

The standards by their nature are not the finished articles and only when dashboard users are interrogating their pension data will we know if the standards work.

We expect iterations of the standards to take place, but we would like a balance to be struck between what is necessary and not overburdening pension schemes and providers with too much change too often. Schemes have set up specific project management teams to get ready to connect and onboard to pensions dashboards, so will be more adaptable in the period leading up to their own connection dates and the Dashboards Availability Point (DAP). Once project management resource has been assigned to other regulatory change or projects, the capacity to adapt to new iterations of the standards will be reduced and so it will be important to have stable standards from the DAP onwards.

When answering the questions in this consultation we had user understanding front of mind, but we were also cognisant of overall user experience, security and technical achievability of the proposed standards. We have consistently asked for extensive user testing in respect of understandability, and we believe this should still happen and feed into the standards. The standards consultation also makes clear that we need to test with users the level of service they would consider good practice for looking up their life savings, having meaningful data presented back to them and potentially real time calculations (from some of their schemes/providers).

In respect of feasibility, where members are connecting directly and/or considering real time calculations, they have expressly stated that 2 seconds is too tight and is likely to discourage them from doing real time calculations. Allowing data providers to either deliver view data in two payloads (the first in two seconds, the second with a longer response time) or allowing ten seconds for the return of view data including real time calculations would make this feasible. This is where understanding the whole user experience from dashboards will help us to know if ten seconds would be acceptable.

Although some of our members will be connecting directly to the dashboards ecosystem, many of our members will be using an integrated service provider (ISP) to do so. With the ISP market only emerging recently, many of our members are unsure of the ISP view on the standards and whether they are feasible in respect of connection, service, technical and reporting requirements. PDP should make every endeavour to gather the views of the ISP market and feedback to schemes and providers to ensure that there is confidence in the standards.

The interlinking of DB Schemes and AVCs from how matching criteria will work to how data will be displayed including the estimated retirement income (ERI), is still far from ideal in these standards and more thought, user testing and consultation with industry will need to take place.

The treatment of small pots in respect of ERI and accrued income does not seem to be fully considered.

We also have major concerns with the treatment of possible matches. The ability to store the PeI in the case of a possible match would lead to much quicker resolutions by the contact/administration centres of pension schemes and providers and allow for processes to be built that ensure the possible match doesn't keep reoccurring where the resolution is a negative match.

Finally, we would like to understand how the standards would work with different platforms other than desktop, to include smart phones and tablets. The security standards, by linking in to the National Cyber Security Centre, have considered different platforms, but we are not aware of the other standards doing so.

CONSULTATION QUESTIONS

Code of connection

Operational standards

Security standards

Service standards

Connection guidance

1) **Do any of the proposed requirements pose a specific problem for your organisation, if so, what?**

   Our main concern, and that of our members, is that many of the questions are best answered by an ISP market that is only just emerging and QPDS that do not currently exist. Pension schemes have only just started to engage with ISPs and not all have had discussions at the level of detail to know if these standards are set at the right level.

   With so much resting on ISPs meeting the standards set out, our members need to be given the confidence that this relatively new market is able to do so.

   In particular, there are still many elements of the lower-level design that are not finalised. For Cohort 1(a), not having finalised standards until late 2022 could place a significant risk of schemes' ability to implement a solution in a controlled fashion.

   Security

   We welcome that a robust approach is being taken in respect of security of the ecosystem. However, it would be good to understand what constitutes a minor issue found by annual testing, to understand whether taking a year to address it by either the QPDS, the ISP or those data providers connecting directly is acceptable. We would also like to know if there will be requirement on schemes to get confirmation on a periodic basis of results of security testing.

   The guidance sets out that Transport Layer Security (TLS) 1.2 is the minimum requirement and that TLS 1.3 is best practice. Although this guidance was developed in consultation with the National Cyber Security Centre (NCSC) we note that according to them there are still some issues related to TLS1.3. As mentioned in one of the NSCS blog articles from 2018 on the subject, which is referred to by their 2021 guidance on TLS, they state that TLS 1.3 is better for individuals than it is for some enterprises, who will wish to continue using TLS 1.2. We do not know the extent that ISPs and QPDS will be using TLS 1.2 as opposed to TLS 1.3, but it does seem odd that TLS 1.3 is considered best practice in the security guidance, when the NCSC indicates that for some enterprises it is far from ideal.

Service

We have specifically answered questions that relate to time taken for each response under questions 3 and 4 below. It would however be useful to understand the expected time taken for the whole user journey via a QPDS and the MoneyHelper Dashboard to know the proportion of time each step would take and its impact on user experience.

The core to knowing what is an acceptable level of service is to test the user experience and we are yet to see the results of any user testing that may have been done on this.

Greater clarity is also needed in respect of the standards around service uptime and whether the 99.5% and 0.5% unscheduled downtime only apply to core hours as appears to be implied in the best practice column of CoCo2.1.5.

In respect of the procedural service standards, the handling of PeI for possible matches, which are later resolved as matching/not matching, will be crucial to improving find data accuracy and the user experience. The PLSA stated in our responses to the DWP consultation on the regulations and the further consultation, that the Dashboards Availability Point (DAP) should not take place until a threshold on data matching accuracy is achieved and that user testing would be needed to ascertain this. Looking at the standards as set out, the need for testing is even more apparent, as key elements such as whether the possible match PeI needs to be logged or not, and whether the handling of false maybe PeIs is sufficient to ensure they are not regenerated after being resolved, are not certain.

Operational

The PLSA is comfortable with the onboarding operational standards because as members of the PDP Steering Group we have been privy to process maps that support them. It would be useful for the Process maps and further guidance for both onboarding and business as usual to be published on the PDP website to help inform pension schemes and providers.

Concerns have been raised by our members about the lack of draft guidance on CoCo3.2.3 (dispute management resolution) in particular.

2) **Are there any areas that you consider are missing from the code of connection?**

No, we are comfortable that only the areas of the Code of Connection where PDP have already identified further detailed guidance is required.

3) **Do the proposed service levels seem reasonable for a digital service?**

The service levels seem too high in respect of data providers returning to the central digital architecture an acknowledgement of a find request in less than a second, and a PeI in less than 60 seconds, and returning to dashboards view data in less than two seconds. Open Banking apps and other comparable digital services do not appear to be meeting these

standards and there is a risk that these standards could be setting up QPDS, MoneyHelper, schemes connecting directly and ISPs to fail. Ultimately, we would want to hear from the ISP market to understand what an achievable service level would be for each response time.

The question we raised in an earlier answer, is how do these response times feed into the overall user journey and experience. We would also be keen to see user research on expected speeds in the context of looking up an individual's entire pension wealth.

4) CoCo 2.1.3 requires view request responses within 2 seconds. This prioritises a fast response for the consumer. It may, however, create a barrier to calculating real time values for some providers. We would be particularly interested in views on this approach.

Many of our members are not considering producing real time calculations, but we do know of some who have been put off doing so because of the view request response time in these standards.

Some of our members who are considering producing real time calculations would prefer two possible alternative approaches which the standards should support. The first alternative is to allow two payloads to be delivered, with the first without calculation taking less than two seconds and the second payload with the calculation arriving some seconds later. The second approach would be to allow response times to be up to 10 seconds, to allow for times when the system just freezes for a couple of seconds during calculation, and for SLAs to be met, all or most of the time. We believe it would be worth user testing both alternatives.

Most of our members are likely to calculate values in advance on an annual or monthly basis and store them as data fields, rather than calculate real-time values on request. This is partly because not all admin systems hold the necessary data for real time calculations. This then becomes increasingly "stale" data compared to "fresh" values which might be possible if the view response time was, say, 10 seconds. All of our members have expressed concerns that their ISPs may not be able to cope with less than 2 seconds response time for view data even without calculations. 10 seconds may allow ISPs to deliver view data with greater confidence, but as said above, we would expect this to be user tested.

5) Do the proposed steps for connecting to the dashboards ecosystem directly seem reasonable?

The steps outlined in the Connection Process and Guidance for connecting directly to the dashboards ecosystem are pragmatic in these initial stages of onboarding data providers.

It makes sense, in these early stages, that schemes wishing to connect directly should inform PDP in advance, build in 9 months prior to their connection date and have time allocated by PDP for testing.   Some concerns have been raised about early connection which we mention in answer to question 23 below.

In the future however, some schemes may wish to switch from ISPs managing their connections to connecting directly or directly through a third-party interface, and the standards as written may have to evolve to adapt to a more mature ecosystem.

6) Do the proposed steps for connecting to the dashboards ecosystem (via a third-party connection) seem reasonable?

The steps outlined for registering a third-party connection at least a month prior to connection, seem reasonable. Some of our members have expressed the wish for the process of registering to be digital and secure rather than paper based to ensure no time is lost.

As mentioned above, some concerns have been raised about early connection which we mention in answer to question 23 below.

7) Does the proposed timeframe for completing these steps to connect seem reasonable?

Yes, we welcome that PDP will seek to complete the registration process in less than a month and expect it to take only a week.

8) Is it clear what pension providers/their third-party ISPs (Integrated Service Providers) or dashboard providers will need to do to connect?

Yes, it is clear what pension providers and ISPs have to do to connect to the ecosystem.

9) Is there any additional guidance you need in relation to connection? And if so, what?

It would be good to see further guidance around business as usual and offboarding. This would aid our understanding of crucial areas such as dispute resolution and when an ISP or third-party commercially exits the market.

Data

Data standards

10)   Are you confident that the proposed data standards adequately cover the benefit structure of all pension providers?

We welcome that the data set has been expanded to include both accrued pension and Estimate Retirement Incomes, as this will help align the data sent by schemes with the data shown on dashboards to the end user.

We also welcome the use of NI Number, Date of Birth and Surname as the main data matching characteristics, which should present a good balance between connecting users to their pension information and preventing false positives.

Many of our DB members are concerned about how AVCs attached to their schemes will be shown. The AVCs are often used to build up the Pension Commencement Lump Sum and

therefore allow all or a much larger share of the DB scheme to be used for income. Showing the AVCs as a DC scheme that will produce an income in retirement is misleading in these circumstances and potentially counterproductive as the DB scheme will usually produce higher guaranteed income. This is a critical issue for our members.

Our members have asked for a free text warning on AVCs to explain if it is either used to provide PCLS or buy extra benefits, sometimes with very generous guaranteed conversion rates, and to contact the attached scheme to find out more.

There is also concern about how data matching criteria will be set where there is a DB scheme and an AVC. If the criteria are misaligned there may be cases where two schemes that are interconnected but only one shows up as a match on a dashboard. Our preference would be that either the matching criteria set by the main scheme is also used by the AVC provider or all the data is managed by the main scheme and there is no need to go to the AVC provider.

11) Can it express the correct values to all savers? If not, please share a brief description of the relevant benefit structure?

The examples cited for multiple tranches in the Data Usage Examples Appendix shows data being presented with either different start dates or different end dates for different amounts of income starting to be paid. Unfortunately, though the general preference would be for the first way of handling tranches as demonstrated in illustration 5a, neither 5a nor 5b adequately cover many examples of how multiple tranches work, which could be a significant issue. We know of situations, for example NRA65 schemes (with Barber windows) where all the tranches have to be taken at the same age, but some of the benefits could be unreduced at age 60 but ultimately the amount the member will receive will be different at different ages because of the age sensitive tranche. This is an area that need not be regulated at this stage and would warrant industry doing some further thinking and coming up with guidance on best practice. Some schemes have very complex, double digit, numbers of tranches which integrate with each other. Standards cannot hope to cover such complexity: industry must devise guidance.

12) Are the values allowed for the accrued (2.3xx) and ERI (Estimated Retirement Income) (2.4xx) warnings sufficient?

Concerns have been raised in respect of small pots and the accrued and ERI values that are given. Some of our members have indicated that if the value of the pot is £2,000 or less then this would not generate an income figure on statements, and they believe returning a figure of Zero for income on the dashboards or a very low annual income figure would be counterproductive. Perhaps a warning as used by the Danish dashboard indicating that the income figure is less than £100 would create a better user experience. Exceptions may have to be made for those near and post retirement. All of these points would have to be user tested.

Post-retirement: More thought is required in respect of individuals who have passed their scheme retirement date age by a few months or years. Schemes often provide information in significantly differently ways when a member's retirement date is in the past rather than the future.

User testing of such individuals is needed so that the display of information (e.g. past dates, no ERI projection) does not appear odd or misleading. Currently, little consideration seems to have been given to post-retirement date age cases and the various complexities in this regard. For example, accrued annual (and maybe ERI) amounts should have an exemption for post-retirement date age cases, as some schemes do not normally provide projections to older members. As ever, extensive user testing is required to help define optimal standards.

Divorce: More categories of warnings are needed in respect of pensions divorce settlements. Currently there is only one warning for pension sharing order which does not indicate whether the pension sharing order has already been applied or is due to be applied, it might be worth having two separate PSO warnings for before and after scenarios.

Likewise pension sharing is not the only possibility on divorce, in Scotland, savers can also have pension earmarking and in England, Wales and Northern Ireland, pensions attachment. Pensions earmarking in Scotland only allows for earmarking of lump sum benefits or death benefits, whilst pension attachment in the other home nations, allows for attachment of income, lump sum and death benefits. It will be important to have codes for each of these possibilities, to reflect the different legal regimes in the UK but unlike with a PSO it will only be necessary to say that it is subject, rather than it has been applied, as it is linked to the original member's retirement or death.

The OTH message (i.e. warning that the user should contact their scheme / provider for an "other" reason) could allow for free text from the scheme or provider to deal with new entrants, where value data isn't immediately available because contributions haven't been received or in the case of a DB scheme service hasn't been long enough yet.

Also, an additional warning would be helpful for scheme transitions: this is where the new administrator may have enough data available to fulfil match / find processes, but have not yet completed the automated routines to calculate ERI. In this case, it would be helpful to have a specific warning rather than using OTH which could trigger a significant increase in member queries.

13) **Are there any other common reasons or scenarios you think these warnings should cover (bearing in mind we cannot support scheme-specific warnings).**

It might be necessary to have a warning code for transfers, to include in the process of being transferred out, has recently transferred out and in the process of receiving a transfer in. This would enable users who are implementing pension transfers to see that the system is taking them into account. Not all of our members agree with this, however, as they feel it would add significantly to the complexity of data provision.

14) **Would the ability to add a short piece of free text to cover pension provider specific issues be workable for you, or introduce a new burden? If so, how many characters would be required and what topics would it cover?**

Many, but not all, of our members would welcome some free text to help manage contact between schemes and members. Somewhere between 150 and 250 characters has been suggested. Careful consideration will be needed over the purposes and definitions of all such messages.

15) **Without a new unique reference to link two pension elements together, the benefit values may get presented separately in a dashboard.**

Unique reference number interlinking DB schemes and AVC schemes or different tranches of schemes are a useful function that we welcome.

Not all DB schemes will find it necessary as they have decided already to manage the AVCs data and present with their own.

16) **Would the requirement for a scheme to create that new reference and share it with their other administrators be more onerous than dealing with any potential downside from not presenting the benefit values together onscreen?**

Schemes that find it more onerous, may chose to take the approach of uploading the AVC data themselves through their ISP. Others who have chosen to have the AVC provider to present the view data would prefer the new reference.

We anticipate the whole areas of DB main schemes and AVCs to be challenging and requiring considerable user testing.

Employment data

The consultation does not ask any questions on this topic, but some of our members are concerned about how to deal with multiple employments relating to a single pension entitlement. More broadly, the fact that "user testing will be carried out to ratify the extent to which employment data is included in the data standards" is deeply frustrating given that API design and build work has already started.

Design

Design Standards: Call for Input

17) **Do you have any challenges (or support) in relation to our developing policy on design standards?**

Do you have any evidence to support your input?

Have we omitted any issues in developing our policy on design standards?

The PLSA would like to see disclaimer wording on pensions dashboards that makes clear to users that values shown are indicative, limits scheme and provider liability in respect of those numbers and directs user to contact their scheme or provider before making any decisions on their pensions.

The liability disclaimer could be in the terms and conditions for the pensions dashboards to be agreed by the user and other elements of the disclaimer could be upfront and follow the example below.

Things to be aware of when using a pensions dashboard:

CONTACT your schemes and providers before you take any action with your pensions

OPTIONS exist for each of your pensions which cannot be shown on dashboards' simple summary

INDICATIVE estimates only are shown, based on current assumptions which may change

NET pension may be less after the deduction of any income tax payable

SUPPORT is available from MoneyHelper, your schemes and providers, and regulated advisers.

Concerns have been raised by PLSA members about the materials QPDS could present alongside the dashboards, and that this could potentially be used to sell to users of the dashboards. Members have expressed the desire that any material presented by the QPDS is strictly technical in nature and is not used to commercially benefit the QPDS.

Our members have noted that exporting of data has not been mentioned under the design standards. We believe exporting of data could lead to both potential selling to users and monetisation of the data, and we would expect to see this restricted. One restriction could be for the FCA to prevent any exported data being provided to non-regulated firms and for restrictions to be placed on the use of exported data by regulated firms, with regular regulatory supervision of those uses in practice.

We would have also liked to have seen more clarity on data ordering and layering at this stage, alongside approaches to presenting data on different platforms, including desktops, smart phones and tablets. We appreciate that some of this extra clarity may come through the FCA consultation on QPDS and the later PDP consultation on Design Standards.

18) Do you agree with our approach to design standards principles and assumptions?

In you or your organisation's experience (please provide evidence if you are able), are there any important principles or assumptions missing in our approach?

We welcome that the approach to design standards restricts information displayed to that provided by schemes and providers as part of the data standards and does not allow for any information that could be potentially mislead savers.

Ultimately these standards will have to be iterative and learn from interactions with users interrogating their real-life pensions data.

We also welcome that there is an element of latitude to allow QPDS to present information graphically. It is also useful that dashboards will be able to present income figures monthly and/or weekly as well as annually if they wish to do so. Our preference would be to allow totalling of income figures and timelines to demonstrate this.

User research and testing, in Sweden in 2015, The Netherlands in 2019, wider European work in 2021, and from PDP, has consistently shown that most savers just want to see the monthly total income they might get in retirement.

Amongst PLSA members there is widespread, although not universal, support for the timeline display idea, such as the Danish example below. However, there are concerns that the key differences between increasing and joint-life DB incomes compared to flat & single-life DC incomes may not come across to most users.
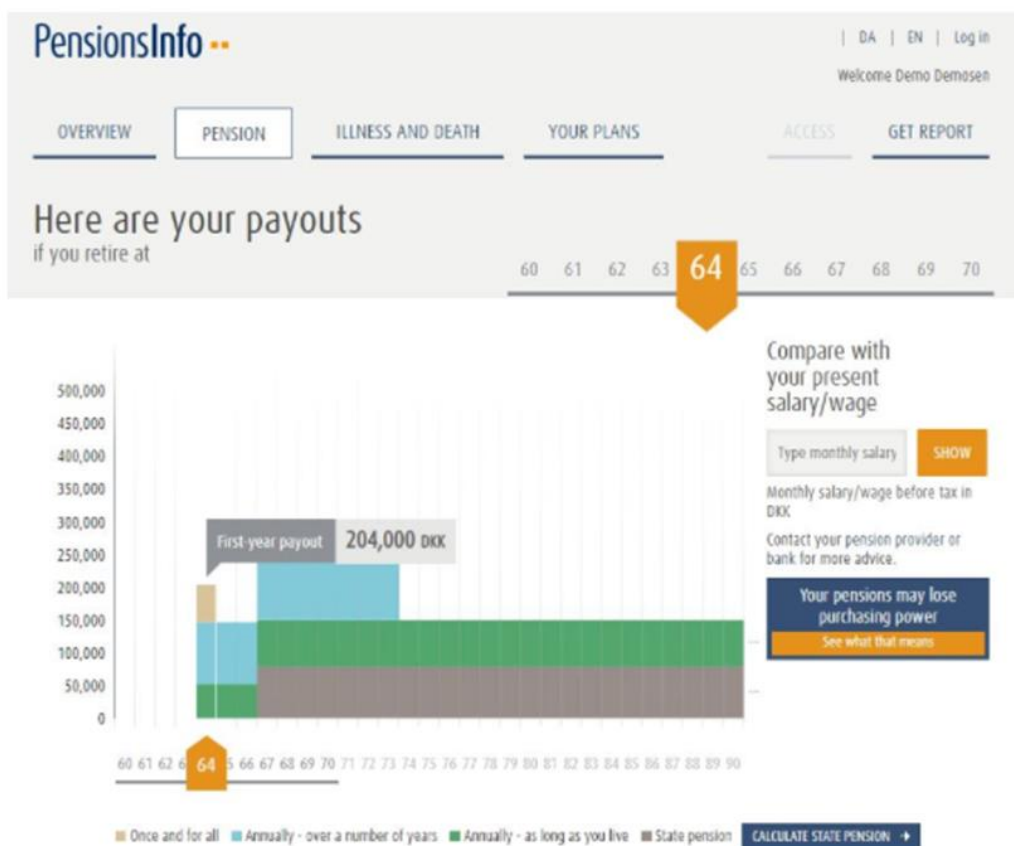
19) Are we right to favour the user over the QPDS where there is any conflict between their needs?

Yes, we agree with this approach of protecting the needs of the user. Consideration does however have to be given to the fiduciary duties of trustees to also protect the data of their members.

Reporting

Reporting standards

20)   Please provide comments on our overall breadth of information required.

Are there any technical barriers to you in supplying the reporting data?

Are there any barriers to providing both the auditing and monitoring data feeds in mostly near real time?

Management information and oversight data is to be provided daily. Do you have any alternative suggestions which would achieve our aims?

Our members have not been able to grapple with the full list of reporting requirements, finding the information required confusing.

It would be helpful for a checklist to be provided, so that schemes and providers can understand exactly what is being reported against.

We understand that much of the reporting requirements will rest with the ISPs and therefore the technical challenges associated with the requirements also are with them. Our members would however like the concerns of TPAs and ISPs to be considered fully in developing the reporting regime. Our members do also need greater clarity on the requirements to give meaningful oversight and fulfil their dashboard duties.

Some of our members have expressed specific concerns about the reporting of complaints, which implies a complaints process that could duplicate and complicate the current complaint journey, of internal dispute resolution followed by external dispute resolution, through the Pensions Ombudsman. The definition of complaints "related to pensions dashboards" needs to be precise, although it is often not possible to categorise complaints until they have been closed and root cause analysis has been performed. One option would be for just closed complaints to be reported, which clearly would not be real-time.

Members who are connecting directly to the pensions dashboards ecosystem have questioned the need for all of the reporting requirements and for this information in real time and daily. There are genuine concerns that this will be too onerous for connecting data providers and the PDP. This could increase the costs of governance considerably without a true understanding of the benefits.

The PLSA would like to see a greater explanation of the need for daily real time reporting information and an understanding of why each reporting requirement is deemed necessary by PDP.

21) The transport method for data is to push data to an API housed on the central data architecture API gateway. Do you perceive any risks with this approach?

Our members have not expressed any concerns, but this will be mainly for ISPs to opine on.

Technical Overview guidance

22)   Do any of the proposed requirements pose a specific challenge for your organisation?

Are there any areas where further detail is needed?

Do the proposed service levels seem deliverable for your organisation?

Do the proposed timeframes seem reasonable?

Is there any more guidance you need in relation to these requirements?

The technical overview guidance is comprehensive covering the governance register and each of the components of the dashboards ecosystem before detailing most of the call and pull functions.

We would welcome more explanation of the guidance in places, as the guidance is highly technical using html code, and for example it is unclear with the handling of the PeI by the scheme or provider's register how possible matches will be treated as opposed to matches made or matches not made.

API (Application Programming Interface) Standards

Technical (other)

Early connection

Early connection guidance

23)   Do you consider the notification requirement to be reasonable?

Our members find that on balance giving at least 2 months' notice period for early connection is reasonable. Furthermore, they can understand how some of the earlier cohorts of data providers may wish to connect earlier to have more time for testing.

Concerns have been expressed however about how early connection would be compliant with GDPR and there will need to be the establishment of the legal basis or guidance from ICO to enable early connection, before a scheme's connection date has passed and they are then under legislative compulsion to be connected

One TPA has expressed concerns that they may not be able to manage early connections in high numbers alongside those connecting on time, and that as a result a longer notice period may become a commercial norm that supersedes the guidance.

24) Do you consider the minimum requirement for at least a month's extension (for schemes with an existing date) to be reasonable?

Our members believe this to be reasonable and it aligns with the length of time for most connection windows.

Governance Setting standards

25) Do you have any comments on the change process and timeframes?

Given the potentially significant burden of changes on schemes, we welcome that changes will be limited to twice per annum. However, we feel that controls on standards are needed to maintain a balance between what is necessary and what could prove onerous.

In any case the controls should reflect the published proposals that standards will always:

a)   be developed collaboratively with industry

b)   be consulted on before changes are made, in accordance with Government's published principles for consultation

c)   change no more frequently than twice per year in normal circumstances

d)   change at around the same time each year

e)   provide at least 6 months' notice before changes become effective, except for exceptional circumstances

f)   be approved by the Secretary of State before coming into force, and

g)   support backwards compatibility for a reasonable period so previous versions of standards can be used by schemes until they are able to upgrade to the latest versions.

The timing of changes is crucial, and many of our members have asked for April to be avoided as a key point in the administration cycle for schemes.

As we stated in our response to the DWP consultation on regulations, we understand that the initial stages of dashboards will mean changes to standards may have to be more

frequent but again we would ask that these are limited unless an emergency to twice per annum.

26)   Do you agree with our definitions of major and minor changes to the standards?

We think the definition of minor changes does not consider that a change could have a major material effect on a select cohort. We believe that minor changes need to be redefined to expressly state that they do not have a major effect on several schemes or providers.

Consultation Document

27) Are your clear on the differences between standards, statutory guidance and recommended practice?

As the previous DWP consultation document says, the standards are, in effect, a third, tertiary, layer of the legislative framework. However, as we stated in response to the previous DWP consultation, it is not clear to us the status the standards would have in a court of law, particularly where there is divergence between regulations and standards (even if all attempts are made to ensure continual alignment between the regulations and the standards). Greater clarity on the status of standards is still required.

We do understand the difference between statutory guidance and recommended practice.

DISCLAIMER