

Pensions Dashboards Programme

Progress Update Report

April 2021

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) 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?

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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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**

In some ways it's hard to believe that six months have already passed since our last progress update report. As we collectively emerge from lockdown, for what we hope will be the last time, it's clear that we've made some significant steps forward in the Pensions Dashboards Programme. Far from standing still, the last six months have been full of activity.

The programme remains on track against the indicative timeline that we published in our last progress update report.

With our procurement of the principal digital architecture underway, and further work taking place on developing an onboarding strategy, we are in the position to add further detail to this timeline, to enable industry to prepare for connecting with the dashboards ecosystem. We have also undertaken invaluable market engagement on the identity service, to support the final development of requirements prior to going to tender.

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The programme remains on track against the indicative timeline that we published in our last progress update report.

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We have a new Programme Director, Richard James, who joined us at the start of April. Richard brings with him considerable experience of leading digital transformation programmes, which convinced the interview panel, he was the individual to take the programme forward.

We have seen progress too from our colleagues at the Department for Work and Pensions, with the passing of the Pensions Schemes Act, which lays the legislative foundations for pensions dashboards.

He has some big shoes to step into. Jamey Johnson was seconded from the Department for Work and Pensions (DWP) to lead the programme in March 2020. He built upon the initial progress in engaging with the pensions industry, creating a timeline for our programme delivery and took us through the delivery of data standards for initial dashboards, to where we are today. I am extremely grateful for his contribution to the programme and we all wish him the very best in his new role with the national Test and Trace programme.

In addition to seeing a change in our leadership team, we have also seen the culmination of the huge undertaking to define the requirements for our digital architecture and gain the necessary approvals for its procurement in line with the government requirements. A procurement of this size and complexity attracts a lot of attention. Thanks to the dedication of the team, the approvals processes we have undertaken have improved our approach and we are well underway.

We have seen progress too from our colleagues at the Department for Work and Pensions, with the passing of the Pensions Schemes Act, which lays the legislative foundations for pensions dashboards. This marked a significant moment for all of us, but is just the start of the legislative process.

We will be working hard with our colleagues in DWP throughout the rest of this year to help them develop and consult on the detailed regulations that will require industry to deliver the data required for pensions dashboards. We will continue to engage with industry on these requirements and, working with the regulators, provide further guidance on how best to get dashboard ready.

No doubt the next six months will bring their own share of challenges but by the time of the next update, we should have awarded contracts for the majority of the digital architecture, which will take us into the next phase of the programme. Here's hoping for a smooth path out of lockdown and a productive summer for us all.

Chris Curry
Principal
Pensions Dashboards Programme



2 Executive summary

Pensions dashboards will help individuals view their pensions information online, securely and all in one place, thereby supporting better planning for retirement and growing financial wellbeing.

The Money and Pensions Service (MaPS) set up the Pensions Dashboards Programme in 2019, where we are responsible for designing and creating the pensions dashboards ecosystem, which contains the digital architecture that will make pensions dashboards work.

We are also responsible for developing the governance framework to support and enable the implementation and operation of pensions dashboards.

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

This is our third progress update report and provides a summary of what we have achieved since October 2020, when we published our last report.

Summary of achievements

- **digital architecture procurement** – following approval from government, we have commenced our procurement of the principal digital architecture for the pensions dashboards ecosystem. The procurement is underway and we expect to award the contract within the next six months
- **identity service procurement** – we will shortly commence a separate procurement exercise for the identity service, which will verify dashboard users really are who they say they are. This follows analysis of the industry response to our market engagement exercise and a further Call for Input in early 2021
- **data standards** – in December 2020, following extensive engagement with the pensions industry, we published a set of data standards for initial dashboards, which split data sets for find (the data that matched with records held by pension providers) and view (the information to be displayed on users' dashboards)
- **onboarding** – our Head of Onboarding has engaged extensively with industry representatives, and continues to do so, as part of developing an onboarding strategy. This includes working to identify the first set of volunteer providers, schemes and administrators to help develop and test the digital architecture



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



- **team building** – we have successfully scaled up the team to ensure that we can deliver the next phase of the programme. This has included recruiting key senior roles and technical expertise, including a new Head of Technology
- **consumer protection** – we have continued to develop our policy thinking around consumer protection, as well as our understanding of what this means for the liability model
- **developing user centred design standards and service standards** – in our working groups and research, we have worked on identifying high level user needs, establishing the user requirements, creating personas and mapping current user journeys. This work is ongoing

- **research and insight** – we are undertaking a range of work to further define the pensions landscape, expand our evidence base and define user needs
- **governance** – our reporting structure, including the steering group, Board sub-committee and portfolio committee continue to oversee our progress. PDP is now part of the Government Major Projects Portfolio (GMPP), managed by the Infrastructure and Projects Authority (IPA), which brings increased government oversight
- **communications** – we issued newsletters monthly, with additional blogs, videos and news reported on our website and social channels, whose reach continues to grow
- prototype and carry out user testing to further define user needs and requirements from dashboards
- work with our colleagues at the Department for Work and Pensions (DWP), the Financial Conduct Authority (FCA) and The Pensions Regulator (TPR) to support progress on secondary legislation, following the passing of the Pensions Schemes Act 2021
- build the team, to ensure we have the necessary skills and capacity to deliver the programme effectively
- work with the pensions industry and the regulators on creating an effective, consumer-focused onboarding strategy, which we will communicate as soon as possible, together with our delivery partners, to ensure that pension providers understand their obligations
- ensure that we engage with all our stakeholders to communicate progress on an ongoing basis
- further streamline governance, working within the GMPP framework

Focus and priorities

Over the next six months, we will continue with our digital architecture and identity service procurement. We anticipate awarding contracts and having a supplier in place by October for the central digital architecture, with the identity service to follow in early 2022.

We will also continue to:

- develop and share our thinking on consumer protection and how things will get resolved if something goes wrong, including a liability model
- ensure users are at the heart of everything that we do. We will carry out an information architecture project, to establish the taxonomy and site navigation of pensions dashboards from a user perspective. This will feed into the standards that dashboard providers will use
- work on design standards for pensions dashboards
- develop a user experience (UX)



3 Programme overview

Dependencies

Delivering the Pensions Dashboards Programme is an exercise in collaboration. We are reliant on the contributions of our delivery partners, DWP, the regulators (TPR and FCA), not to mention the actions of thousands of data providers, which all need to ready their data for connection to pensions dashboards.

Our Portfolio Committee consists of representatives from PDP, TPR, FCA, DWP & MaPS. The role of the group is to raise awareness and enable discussion of dependencies and risks that cut across the responsibility/accountability of the organisations. The Portfolio Committee meets regularly to review progress and ensure a co-ordinated approach to delivering pensions dashboards.

Timescales update

We published our indicative phase plan in October 2020. One of our key aims was to provide our stakeholders with an early indication of when we think they will need to act. Notably, we set out our view that compulsory staged onboarding would begin in 2023. [There's more on our onboarding strategy below.](#)

Since October, we have spent time developing our plans and learning more about the complex landscape in which we are operating.

We have further developed our commercial strategy. As a result of this, we identified the most suitable procurement route for our technical delivery partner and procurement has started. There's more detail on our digital architecture procurement architecture procurement below, on [page 21](#).

We have developed an updated indicative programme timeline. Our overall phase plan still holds true but it contains an extra layer of detail. The timeline provides a clear breakdown of what will take place over the next six months, plus the expected timing of key milestones within later programme phases.





Programme



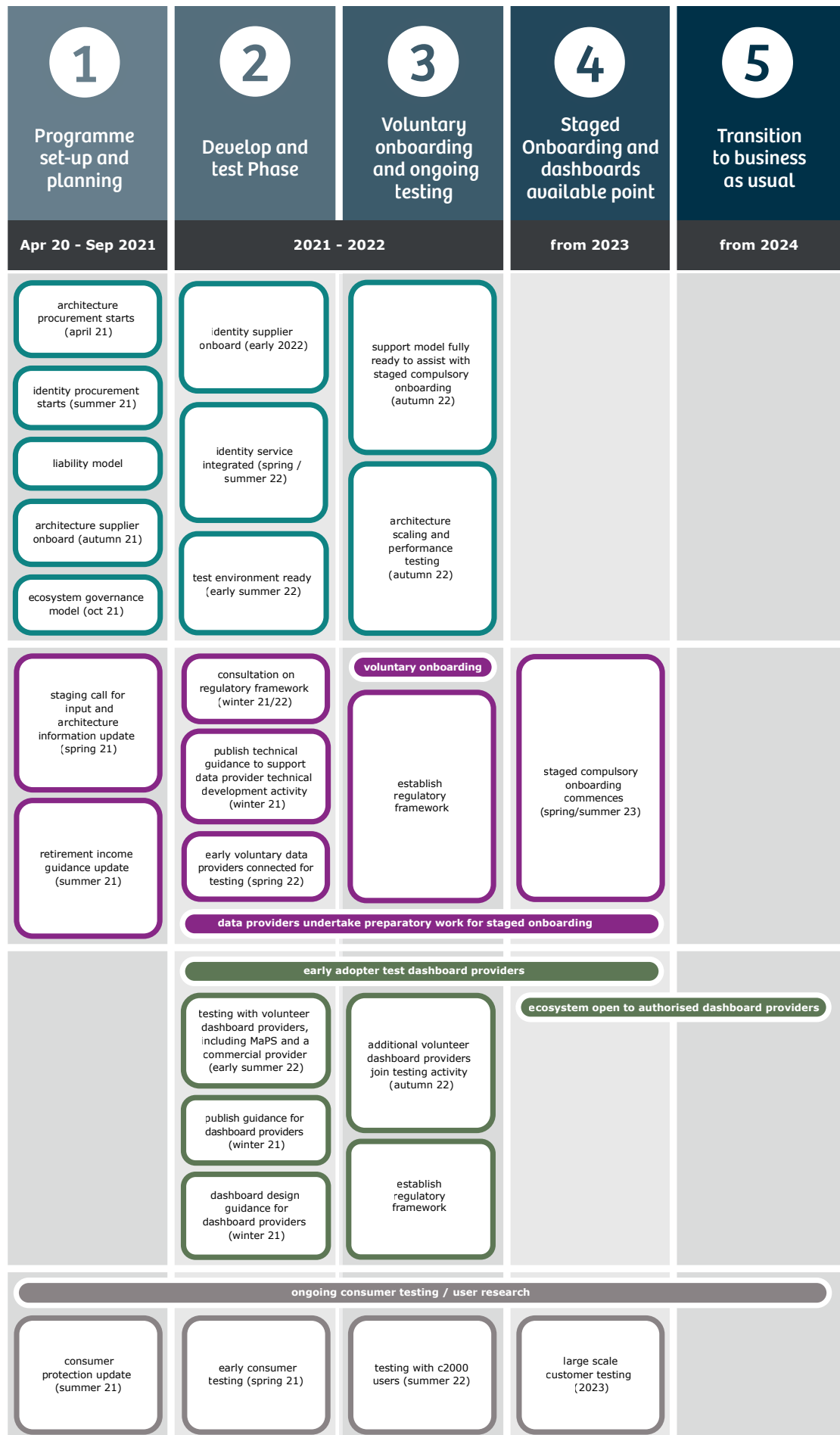
Pension providers



Dashboard providers



Consumers



We recognise that data providers (ie pension providers, schemes, administrators, trustees and intergrated service providers (ISPs) want more certainty and detail around what they are being asked to do and when they will be asked to do it.

“ With an expanded leadership team in place we will be in a strong position to deliver against our ambitious work plan for 2021 and beyond. ”

We have published more information for data providers, in line with the contents of the updated timeline about the steps data providers need to take, in order to prepare to connect to dashboards.

As the timeline indicates, we will shortly publish further information on technical specifications, which we developed as part of our ongoing procurement process. We will also publish a Call for Input on staging, with more detail on the proposed order and timing of staging.

Further detail is available on the [timeline page on our website](#).

We are committed to providing as much information as possible as soon as it becomes available, to provide industry with sufficient warning to prepare their systems.

Building the team

Since October, we have continued to build the team. The aim is to attract the people with the right skills for the programme as it continues to develop.

A key priority for the programme was the recruitment of a programme director to lead the PDP on a long-term basis. Following an open competition MaPS has appointed Richard James. He brings a wealth of experience to the role gained from 23 years in the public sector. Most recently, he was Programme Director of the Northern Ireland Trader Support Service Programme. He previously led the implementation of digital personal tax accounts for HMRC. We're already benefiting from his skill and experience in digital transformation.

In December, we welcomed Paul Noone to the PDP as Head of Onboarding. Paul brings over 30 years' experience in the pensions and employee benefits industry. He is engaging with industry and working closely with the regulators to develop a plan for those schemes that want to join the dashboard infrastructure on a voluntary basis, alongside identifying potential dashboard providers.

In March, we were joined by James Reardon as our Head of Technology. James has worked in technology for over 15 years, as a business analyst, product and portfolio owner and consultant. James will be responsible for ensuring that our technology delivery partner meets design and service standards.

With an expanded leadership team in place, we will be in a strong position to deliver against our ambitious work plan for 2021 and beyond.

In addition to strengthening our leadership team, we have focussed on building the wider team, recognising that the next phases of the programme will require a range of skills.

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Partner organisation activity

Department for Work and Pensions

The Pensions Schemes Bill introduced in January 2020, achieved Royal Assent on 11 February 2021 and became the Pensions Schemes Act 2021. It contains the legislation needed to compel pension providers to make individuals' data available to them via dashboards.

David Reid, Pensions Dashboards Programme Head of Policy, [reflected on the new legislation in this blog](#).

The Act allows for the creation of multiple dashboards, to provide scope for innovation and help to engage a broad range of users. Users will also be able to access a dashboard service that is publicly owned, provided by the Money and Pensions Service.



State Pension information will be included on pensions dashboards, to give people a comprehensive view.



State Pension information will be included on pensions dashboards, to give people a comprehensive view. DWP is already making the changes, alongside colleagues in HM Revenue & Customs, to ensure that the infrastructure required to provide State Pension information will be in place ahead of the first publicly available dashboard.

Fuller details of how the dashboards infrastructure will operate and how organisations will need to make individuals' data available to them via dashboards will be set out in regulations. DWP intends to consult on the proposed regulations for pensions dashboards

later this year and lay draft regulations before Parliament for debate in 2022. This timetable supports the delivery plan set out by PDP, which expects the first data providers to be compelled to make data available to users via dashboards in 2023.

DWP is working with the The Pensions Regulator (TPR), HM Treasury, the Financial Conduct Authority (FCA) and PDP on the development of policy to include within the regulations. These will focus on: data requirements, staged onboarding, the compliance regime and consumer protection.

Ahead of the formal consultation, DWP is developing plans in conjunction with FCA, TPR and PDP to engage further with interested parties on emerging proposals throughout the year.

The FCA

The Pension Schemes Act requires the FCA to make rules so that compulsion applies to the providers of personal and stakeholder pension schemes. These rules must take account of the corresponding regulations the Government will introduce for occupational pension schemes. When finalised, the FCA will then be empowered to supervise and enforce against those rules.

Subject to an amendment of the Regulated Activities Order by HM Treasury, the FCA will develop an appropriate authorisations regime for organisations seeking to become dashboard providers. The FCA will also make rules governing the conduct of authorised dashboard providers, to secure an appropriate degree of consumer protection.

Before the FCA can finalise all these new rules, it will carry out a cost-benefit analysis of, and consult on, draft rules. After finalising the rules, the FCA must allow organisations an appropriate period of time to apply for authorisation and/or comply with them.

The Pensions Regulator

TPR will be tasked with regulating the compliance of thousands of occupational pension schemes, which in turn will rely on administrators, administration software providers and ISPs to support them.

It is bringing to bear its experience of the automatic enrolment programme and will take a proactive approach to help industry meet its duties. The regulator will engage with industry as it prepares to comply and work collaboratively with both industry and other delivery partners to identify risks and develop solutions, to make dashboards a reality. TPR is working on designing this engagement programme as a matter of priority so it can launch in plenty of time for schemes to get ready.

The regulators working together

While compulsion is not expected to begin until 2023, the regulators have been laying the groundwork by:

- advising DWP on the design of the legislative framework
- building a view of the systems, processes and data they need to deliver their roles
- working with PDP on the development of the technological infrastructure so it supports their compliance functions
- establishing collaborative working practices with each other, and with PDP, to minimise the burden on industry and ensure those regulated by both regulators are provided with consistent messaging and coherent requirements.

The Money and Pensions Service (MaPS) dashboard

The Money and Pensions Service was tasked by Government to create and run a non-commercial dashboard – the MaPS Dashboard. A cross-departmental team has been working to make this happen. A key consideration for the team is that once people are able to see what they have in their pensions, this will trigger other questions in people's minds. This highlights a need to help them better understand what they have and how they can use that information to help them plan for and in later life.

The main focus for the MaPS Dashboard has therefore been on mapping the consumer journey, and developing insight into the types of consumers who might use pensions dashboards, their onward journeys and what they might need to enable them to support decision making and, importantly help avoid potentially detrimental decisions. MaPS commissioned initial qualitative user research to explore what consumers would want to do upon seeing dashboards to inform our customer journey design. The team intend to publish the results in the summer. They will continue to work with the PDP team to align their activity, especially around consumer needs.

In the coming months the MaPS dashboard team will start to develop:

- their technology solution in line with the expected infrastructure set out by PDP
- their consumer segmentation and journey design
- a roadmap for how they will deliver the support and guidance they offer to consumers who use the MaPS dashboard

5 Programme governance and assurance

Chris Curry is the Principal and Senior Responsible Owner of the Pensions Dashboards Programme. Chris has overall responsibility for making decisions about delivery but he remains accountable to the MaPS Chief Executive and the MaPS board, via a Sub-Committee.

The Sub-Committee meets on a quarterly basis to hold the programme to account, direct its work and take investment decisions.

The Portfolio Committee is now well established. It tracks progress on the major dependencies and is enabling effective coordination and cooperation across all the public sector organisations involved in delivering pensions dashboards.

Spotlight on Portfolio Committee

The Portfolio Committee is a cross-government group, with representatives from all of the delivery partners involved in the programme:

- Pensions Dashboards Programme
- Money and Pensions Service
- Department for Work and Pensions
- The Pensions Regulator
- Financial Conduct Authority

It meets quarterly to enable the effective management of the programme's interdependencies.

David Fairs, who sits on the Portfolio Committee, writes the following:

(NB: this is David's personal view, rather than that of the PDP)

"Bringing all the key players together in the Portfolio Committee is essential to ensure the rollout of pensions dashboards is efficient and effective. It creates a common understanding and commitment to the overall roadmap. It pulls together information from all of us so we have a coordinated view of delivery plans, but also the risks to delivery - just as you would hope it would. This way we can be confident nothing is falling through the cracks."

"At the moment one particular topic of interest is staging – the order in which schemes will be required to participate. The landscape is complex and whilst TPR can look back at its roll out of Automatic Enrolment, in many ways that was a more straightforward operation. With the pensions dashboards programme, there is much more complexity around types of scheme, administrator and industry preparedness."

We need to balance the desire for dashboards to be operational at the earliest opportunity with the many competing demands on the pensions industry and its capacity to provide complete, accurate and digital data. So these are the kinds of issues we can explore and discuss as a group.

"Pensions dashboards are a hugely exciting programme to be a part of, which will transform the provision of information and understanding of pensions in this country. There are a lot of challenges to overcome but through the Portfolio Committee we can challenge and support each other in equal measure, so we can all play our part."

David Fairs

**Executive Director of Regulatory Policy,
Analysis and Advice at the Pensions Regulator**

Our industry Steering Group continues to play a vital role in directing and assuring our work. The Steering Group is a strategic body, made up of pensions industry, consumer and fintech representatives. It is responsible for informing the design and delivery of the entire dashboards ecosystem.

We want people to know more about the Steering Group members and the perspectives that they bring to the role. While all members will have their own individual viewpoints and priorities, some of which are not currently government, DWP, MaPS or PDP policy or part of the programme, the range of views helps to inform and improve the programme.

Spotlight on members of Steering Group

We asked two of our Steering Group members for their take on contributing to the programme – individuals on the Steering Group have differing views and it is this mix of opinion and oversight that allows us to navigate the different requirements of our stakeholders. Please remember, these are their personal views, rather than that of the Pensions Dashboards Programme, Government, DWP or MaPS.

Sam Seaton, Moneyhub CEO, commented:



"It's been nearly a decade since mandatory contributions were introduced, and while this was a positive move, we missed a trick not legislating at the time that information on an individual's pension pots must be visible, available and easily accessible. Fortunately, we are now heading in the right direction, and the implementation of pensions dashboards will be a huge leap forward. Falling at this hurdle is simply not an option – consumers need and deserve the initiative to be a success."

"I've advocated for the consumer throughout my career, so being a part of the PDP Steering Group is immensely rewarding. Having the opportunity to help challenge and secure the necessary change to enable the full potential the project can achieve is very dear to me."

"I am passionate about harnessing the power of digital innovation to transform financial wellbeing. The outlook is hugely positive and 2021 is already set to be a pivotal year for pensions dashboards. Development continues, building towards the voluntary onboarding and testing with pension schemes and providers next year. 2023 sees the compulsory rollout, so momentum really is building and I can't wait to see the final results. Pensions are a fundamental part of successful long-term financial planning. It is essential that we make it simpler for consumers to take control of their future, and I'm delighted to be part of that transformation."

(NB. this is Sam's personal view, which is not representative of the programme as a whole)

Dominic Lindley sits on the Steering Group as an independent financial consultant. He gives us his personal take on supporting the programme activity and where he would like to focus:



"Pensions Dashboards could help savers engage with their pensions, providing new insights that help them manage their money, prompt them to seek guidance or advice and provide access to new products and services."

"To make this happen, consumers need clear rights to their financial data, a body to set technical and data standards in their best interests and strong regulation of intermediaries using this data to provide services. The welcome royal assent of the Pension Schemes Bill and forthcoming DWP consultations will help deliver the first of these. The Pensions Dashboards Programme is making progress developing the data standards and is starting a conversation about the framework for consumer protection."

"We need to learn important lessons from Open Banking but also acknowledge the differences and extra challenges. Open Banking only covered the nine largest banks, dashboards cover large providers and hundreds of smaller schemes. In Open Banking, all of the information is already digitalised and connected and there is an easy way for consumers to prove their digital identity whereas that is not the case in the pensions sector."

"As we proceed in the coming months, three of the issues I will be focussed on include:

The inclusion of costs and charges and details of investments on dashboards: we need to be more ambitious and develop data standards for the disclosure of costs, charges and investments even if these are not mandatory for all schemes to provide from day one.

The inclusion of pensions already in payment on dashboards

The next steps which need to be taken to ensure clear standards for Estimated Retirement Income projections in DC and DB schemes"

(NB. this is Dominic's personal view, which is not representative of the programme as a whole)

Strengthening governance arrangements

In 2020, the PDP underwent an independent Infrastructure and Projects Authority (IPA) programme review, conducted by an accredited reviewer team. We are working to fully implement the recommendations from that review.

In February 2021, programme governance arrangements were further strengthened, when PDP joined the Government Major Projects Portfolio (GMPP), managed by the Infrastructure and Projects Authority (IPA). This recognises the complexity and importance of the programme, recognising us as one of the government's major projects currently underway, which will provide us with valuable support going forwards.

We established the [Digital Design Assurance Group \(DDAG\)](#) in October 2020. It comprises subject matter experts from the pensions industry, the Money and Pensions Service (MaPS) and the Department for Work and Pensions (DWP).

The group meets on a regular basis to provide guidance and assurance on the architectural and technical aspects of the Pensions Dashboards Programme digital architecture and associated systems related products and services.

What's next?

In the coming months, we will focus on the successful delivery of the two major procurement exercises, for the technical architecture and the identity service ([see section 9](#)).

Following the successful procurement of the digital architecture and the identity service, there will be further independent scrutiny of the programme health, before moving to the next delivery phase, where we will onboard selected volunteer providers to develop and test our systems and processes.

Risk Management

Since October 2020, the programme has appointed a risk manager to provide objective review, challenge and oversight of the programme's risks and to support the team to effectively manage them.

To support the proactive management of risk within individual delivery teams, we have created risk champions within each PDP workstream, who meet with the risk manager on a monthly basis.

Risk themes

Although there are many wide-ranging risks to the success of the programme, they have been grouped into themes to allow effective management. These are set out on the next page:



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

We will embed the formal definition of the risk process within the programme's activity.

This will include:

- understanding the relationship between risks and identifying the appropriate escalation process if necessary
- continuing to use programme governance boards to ensure suitable engagement from senior leadership on risks that are material to the success of the programme
- working with our delivery partners to identify appropriate risk mitigation strategies
- striving for resilience by testing and challenging our approach to risk, where appropriate
- aligning with the MaPS risk strategy



6 Pensions dashboards ecosystem design

The Pensions Dashboards Programme is responsible for designing the digital architecture, which will connect users with the information about their pensions via dashboards. We outline the elements that make up this ecosystem in our [introduction to the pensions dashboards ecosystem video](#).

In the last six months, we have developed and finalised the technical requirements for the digital architecture, in preparation for the procurement exercise currently underway. There is more detail available below on [our digital architecture procurement](#).

We have also grown our team, appointing the Head of Technology Development and a technical architect.



A central part of the pensions dashboards ecosystem design relates to the flow of data between users and data providers via pensions dashboards.



Subsequently, we have received positive feedback from the pensions industry to this initial publication of data standards.

What's next?

We are working with the pensions industry and our stakeholders to share this initial publication of data standards. We will continue to refine the data standards based on any resulting feedback.

We will provide more detailed technical information, to support data providers. Following a successful procurement process, we will have further definition on how the ecosystem will work and more precise technical standards, which we will share.

In the meantime, we would continue to urge all data providers (pension providers, schemes, trustees, administrators or ISPs) to ensure that their data is in good shape, in preparation for onboarding to dashboards.

Data standards

A central part of the pensions dashboards ecosystem design relates to the flow of data between users and data providers via pensions dashboards. In December 2020, in line with our programme timeline, we published data standards for initial dashboards.

These data standards laid out the principles of data flow to and from dashboards in processes known as find and view. We explain more in [this video](#), or you can read the [introduction to data standards](#), which provides an overview of the contents of the data standards guide.



Estimated retirement income (ERI)

We recognise that there is an issue around the presentation of estimated retirement income on pensions dashboards.

Pension providers currently use a range of different projection models in their existing communications, which will make comparisons difficult for users.

Either individuals, data providers or dashboards will need to perform the necessary calculations, in order to align this different information. Work is ongoing to determine the best way for dashboards to present information consistently.

Our approach for initial dashboards is to display the ERI as in current provider communications, in the best possible way, recognising the challenges that this will present to the user.

The Joint Forum on Actuarial Regulation has set up a pensions industry task force to look at this issue in more detail. PDP will be represented on this taskforce, alongside representatives from the regulators, DWP and the pensions industry.

What's next?

We will continue to work with industry and our stakeholders to contribute to the debate about implementing a more consistent way of providing and displaying a comparable ERI. This will include working with the industry task force as well as DWP and regulators.

Defining the governance approach

Ecosystem governance strategy

We have started developing a governance strategy to monitor and audit the components and participants involved in making pensions dashboards work. The objective of this monitoring is to ensure participants adhere to the appropriate standards and service levels.

The governance strategy is related to the onboarding strategy, in that both cover the connection of data providers to the dashboards ecosystem. While the onboarding strategy covers the timing and sequencing of when data providers will onboard, the governance strategy provides guidance about how they will do so.

As previously outlined, the strategy will cover:

- data standards provision
- technical interaction components standards
- service levels and obligations
- provision of clear onboarding and change process for participants in the ecosystem
- ensuring governance aligns with policy and regulations to allow for enforcement when needed
- governance structure and operating model

In the last six months, we have undertaken stakeholder mapping and established a framework for the governance strategy. In addition, we have drafted a change process for data standards, which will allow us to update the data standards following procurement, when we have more technical data available.

What's next?

We will finalise the governance strategy within the next few months, following engagement with industry, government and the regulators on our proposals. The governance strategy will provide further information to data providers on what they need to do to successfully onboard to the dashboards ecosystem.

We will further examine the reporting requirements from the ecosystem and agree a change control mechanism to allow full transparency and control.

We will continue to input to the legislative process, to ensure the necessary governance mechanisms are consistent with the secondary legislation, which will be created by our delivery partners in government and enforced by the regulators.

7 Defining a user centred service

At its heart, our programme is all about answering the needs of future users of pensions dashboards. To directly address this core purpose, we have built the team in the last six months, with the appointment of a Service Interaction Design Lead.

In our October publication, we reported on the objectives of our [Usability Working Group \(UWG\)](#), with its range of external stakeholders, including:

- validating the service design of pensions dashboards
- developing user experience guidelines
- providing recommendations and ideas towards defining user needs
- sharing evidence gained from user research
- validating information presented on pensions dashboards

“ We are carrying out research work to identify the high level user needs for pensions dashboards. ”

In the last six months we have held four UWG meetings to share information and ideas to support our user experience (UX) research and design work. We discussed identity and verification and the impact of our qualitative research, the liability model and complaints process and consumer protection.

We are carrying out research work to identify the high level user needs for pensions dashboards. Part of this work has involved creating personas and mapping user journeys through the pensions dashboards landscape to identify any pain points. This work is ongoing.

What's next?

In the next six months we will continue our research and development of a user centred design standards and service standards. We will:

- carry out an information architecture project to establish taxonomy and site navigation. This will look at the language we use within pensions dashboards and how users will move through the process
- we will develop a prototype and carry out user testing, to understand how users interact with the service in order to feed into the design standards
- continue to develop design standards, using the information from our user testing, to ensure dashboard providers create user centred products
- start work to understand service standards and early thinking on service level agreements that we will need to operate the pensions dashboards service, to ensure that dashboard providers meet the necessary standards

We will continue to share ideas and experience at regular meetings of the Usability Working Group. We will work collaboratively to gain feedback on the PDP design proposals and UX design documentation. We will share our thinking and invite feedback from wider industry and consumer groups in due course.

We will also carry out workshops on the findings of our user research, to share the wealth of knowledge across the group.

8

Procurement of the digital architecture

Digital architecture overview

The digital architecture will enable multiple parties to be connected in a secure ecosystem that delivers pensions dashboards for individuals.

It contains several core elements:

- the identity service
- the consent and authorisation service
- the pension finder service
- the governance register

The consent and authorisation service, the pension finder service and governance register are part of a joint procurement, with organisations bidding to supply the combined elements that will make up the bulk of our digital architecture.

We are procuring the identity service separately ([see section 9](#)).

Procurement of our digital architecture is now underway. This is a significant step for the Pensions Dashboards Programme as we move towards appointing the supplier(s) that will build the major components of our digital architecture.

In advance of issuing the Invitation to Tender we undertook significant engagement with potential suppliers, in order to most effectively shape our commercial strategy.

In the last six months, we published the high-level summary of findings from our June 2020 pre-tender market engagement exercise, which showed that:

- respondents preferred to bid for a build and operate service model and indicated it was the most appropriate for the PDP requirements

- a build and operate contract was the most efficient commercial model as it provides economies of scale and incentivises bidders to provide an end-to-end Pensions Dashboards Service

We finalised our commercial strategy, following engagement with government, programme and industry stakeholders. The strategy aligns with the overarching strategic programme objectives and takes into account a number of key areas, including:

- high-level programme phasing plan
- project governance structure
- critical success factors (CSFs)
- pre-tender market engagement
- delivery model options
- route to market options appraisal
- contracting strategy / pricing models

- risk quantification and management
- value for money (VfM) measurement
- contract management arrangements

We completed the technical requirements for the digital architecture, including specifications for the pension finder service, consent and authorisation service and governance register.

Pre-tender approval

As part of the Money and Pensions Service, which is an arm's-length body, sponsored by the Department for Work and Pensions, the PDP has to follow the Cabinet Office spend controls process when we want approval to spend money on specific activities. The Cabinet Office controls are part of the wider government approvals process set out in the Managing Public Money guidance and covers digital and technology service spend commitments.

We have sought and obtained approval to proceed to a formal competitive procurement exercise from:

- Department for Work and Pensions (DWP)

- Cabinet Office Central Commercial Teams, which are part of the Government Commercial Function (GCF)
- Government Digital Service (GDS)
- Her Majesty's Treasury (HMT)

Procurement process and timeline

In February 2021, we selected Lot 4a (Programmes and large projects – covering Government official security classification) of the Crown Commercial Service Technology Services 2 framework agreement, for our competitive procurement exercise.

The procurement exercise is fully compliant with the Public Contracts Regulations and will be shorter in comparison to running a bespoke tender exercise, which can take up to 12 months to conclude.

What's next?

In the next six months we anticipate completing the procurement exercise and awarding the contract to the successful bidder(s).

The high-level procurement timetable is as follows:

Activity	Dates
Publish tender opportunity and invite lot4a suppliers to submit ITT response	13 April 2021
Tender clarification period opens for 5 weeks	14 April – 13 May 2021
ITT submission deadline (17:00hrs)	28 May 2021
Evaluation period	04 June – 07 July 2021
Bidders notified of outcome	21 July 2021
Contract approvals period	22 July 2021 – 3 September 2021
Contract and implementation period commences	06 September 2021

9 Procurement of the identity service

The identity service will verify the identity of all users wishing to find their pensions, to ensure that they really are who they say they are. Identity verification is central to providing users with the comfort that their data is secure and to reassuring data providers that they are sharing pension information with the correct individuals via dashboards.

We are procuring the identity service separately from the rest of the digital architecture, as it presents a separate proposition and requirements.

In November 2020, we completed our engagement with the identity market to gauge the extent to which our proposals for the identity service were appropriate and available. The results of this feedback support our approach of verifying an individual's identity to a medium level of confidence, as defined in the Good Practice Guide (GPG) 45 and a medium level of protection as defined in GPG 44. It also provided direction as we develop the requirements for the identity service.

Our blog from Jon Pocock, Senior product owner for identity, gives a [full update on this market engagement](#).

In February 2021, we carried out an additional Call for Input from data providers, by which we mean the organisations that will provide data to the pensions dashboards ecosystem ie pension providers, schemes and ISPs. This Call for Input was to gather information on how we can give providers confidence in the identity of the user.

We are currently validating the feedback received, which will feed into the requirements for the identity service, ahead of our procurement process, which will commence over the coming months.

What's next

We will begin our procurement process for the identity service within the next few months. We anticipate engaging the successful supplier(s) in early 2022.



10 Onboarding strategy development

In December 2020, our Head of Onboarding, Paul Noone, joined the Pensions Dashboards Programme. He has focused on extending the engagement with key organisations within industry to build on the work done in 2020. This is building a broader understanding of the current position in relation to readiness within industry and what organisations are doing to prepare themselves and their clients to connect with the ecosystem.



We recommend that organisations continue to work on their data so it is in the best shape possible ahead of connecting to the dashboards ecosystem.



Our engagement to date with data providers (pension providers, schemes, trustees, administrators and ISPs) around onboarding, following the publication of our data standards in December 2020, has indicated that they have a high level of confidence that find data is present and has a high degree of accuracy. View data presents more challenges but organisations are devoting significant effort to cleanse data and better prepare view data ahead of dashboard participation.

We recommend that organisations continue to work on their data so it is in the best shape possible ahead of connecting to the dashboards ecosystem.

We recognise that integrated service provider (ISP) solutions (typically a data integration layer that sits between the organisation's core systems and the pensions dashboards ecosystem) are developing and will be key in helping organisations and their clients connect

to dashboards. However, the use of an ISP will still involve some preparation on behalf of pension providers, which may need to map individual data items to the ISP solution and test the data flow in advance of connecting to dashboards.

Voluntary onboarding

We will continue to work towards the voluntary onboarding of providers to the dashboards ecosystem.

We anticipate a two-stage voluntary onboarding approach. The first stage will involve working with system and ISP providers to connect into the dashboard ecosystem and test using synthetic data. The second stage will be the voluntary onboarding of live schemes and arrangements using real data.

In identifying candidates for voluntary onboarding, we recognise that some data challenges exist for view data and that more extensive preparation may be required before providers can present view data to dashboards.

What's next?

We will continue to refine our onboarding plans as we progress through the next stage of the programme and work with our chosen architecture provider to finalise our preparation for voluntary onboarding.

We are keen to maximise the number of potential volunteers and for this reason, we would welcome participation from those organisations or schemes who can only identify that a pension exists for an individual, but cannot yet provide all of the information about that pension. This will allow organisations and schemes the opportunity to voluntarily engage while, in tandem, working on how to present all of the view data.

Should any organisations or schemes be interested in voluntary onboarding we would welcome the opportunity to discuss this in more detail.

Staging

For practical reasons, pension providers will connect to the ecosystem over a period of time, rather than all at once. Given the sheer volume of providers involved, connection dates need to be staged to ensure a smooth implementation and mitigate operational risks. The approach needs to achieve a balance between being deliverable, taking into account the practical constraints and circumstances within the industry and regulators, the capacity of the pensions dashboards digital architecture and achieving the widest possible coverage as soon as possible, to enable people to find and view their pensions.

We have been working closely with The Pensions Regulator (TPR), the Department for Work and Pensions (DWP) and the Financial Conduct Authority (FCA) as well as our own industry Steering Group to consider how the universe of pensions providers could be segmented into different cohorts, for sequential, mandatory connection into the ecosystem.

Based on the government's policy objectives, we have focused this work around a set of staging objectives:

1. pace – maximise coverage of pensions findable as soon as possible
2. deliverability:
 - a. industry – ensure pension providers have a reasonable expectation of being ready to connect
 - b. regulators – ensure TPR and FCA are able to efficiently cope with the increased regulatory demands on them as more pension providers are onboarded

- c. PDP – ensure PDP has the capacity to securely test and connect providers to the pensions dashboards digital architecture
3. enforceability – ensure a monitorable and legally enforceable way of dividing pension providers such that compulsion can be clearly applied on prescribed dates
4. certainty – give pension providers certainty about when they will need to connect
5. equity – minimise potential competition impacts arising due to costs falling on different pension providers at different times
6. learnability – allow for opportunities to test, learn and improve, using insights from early onboarders to improve the experience for pension providers connecting later
7. user information value – prioritise users who may be most in need of guidance/advice, such as those closer to retirement
8. reconnection value – prioritise users who may derive most value from being reconnected to pensions, such as those with the oldest, most forgotten-about pensions and those closest to retirement

What's next?

We are working with TPR, FCA and DWP to assess different options for staging pension providers (including, for example, size, benefit type, pension type, scheme age, use for auto-enrolment etc) against these objectives and against key operational risks. This is all to help inform the DWP's decision as to the sequence in which it will require providers to connect to the ecosystem. See the discussion of their work in section three.

We will publish a Call for Input in early summer to support the development of the staging design.

11 Consumer protection

We are building consumer protection into pensions dashboards. We've adopted and carried forwards the overarching design principles set out by the [government](#) to underpin the ecosystem:

- put the consumer at the heart of the process by giving people access to clear information online
- ensure consumers' data is secure, accurate and simple to understand - minimising the risks to the consumer and the potential for confusion
- ensure the consumer is always in control over who has access to their data



We will continue to work with the Steering Group, DWP, HMT, FCA, TPR and other key partners to refine our analysis and develop our thinking on the protections required...



Over the last six months, we have been working with our industry Steering Group and government and regulatory partners to assess the possible consumer harms that could potentially arise from using a dashboard.

We mapped these harms against the existing protections afforded by current regulations, rules and redress mechanisms. Together, we're undertaking an analysis of the protection gaps and possible ways of filling these gaps to ensure the necessary protections or mitigations are built into the ecosystem to keep consumers as safe as possible.

In assessing what additional protections consumers may need, we're considering a wide range of protection mechanisms, including:

- further design features or principles to be built into the digital architecture
- consumer education and guidance needs
- possible signposting requirements
- monitoring and reporting systems

This is in addition to requirements that entities within the ecosystem will need to adhere to, including standards, regulations, and rules.

We are working closely with our government and regulatory partners on this.

The Money and Pensions Service will only be one player in the consumer protection regime: besides PDP's design, security and other technical standards, FCA authorisation and conduct rules for dashboards will also have a vital role to play, as will government regulations on the criteria dashboards must meet. Further, some of the possible protection gaps may need further research and user testing to determine what might be required to prevent and minimise harm and ensure consumer protection.

What's next?

We will continue to work with the Steering Group, DWP, HMT, FCA, TPR and other key partners to refine our analysis and develop our thinking on the protections required and the appropriate respective roles of standards, rules, and regulations to ensure the necessary consumer protection. We will share our thinking and invite feedback from industry and consumer groups in due course.

Liability Model Update

The liability model is an important part of our consumer protection initiative. It will ensure dashboard users, dashboards, pension providers and the ecosystem as a whole are all clear what happens if things go wrong with the dashboard architecture. It sets out the protocols for how complaints are made, assessed and dealt with as well as covering how liability is shared between ecosystem participants.

With the help and input from our industry Steering Group and delivery partners, we completed a gap analysis and settled on a number of positions for the liability model. These fed into the invitation to tender for the digital architecture, so that suppliers could assess and price our requirements as part of their bids.

What's next?

Bidders have the opportunity to ask questions about how the liability model should work, and we will work with the successful supplier to weave our specifications into the final digital architecture build.

We will continue to work with the Department for Work and Pensions, HM Treasury and the Financial Conduct Authority in relation to how dashboards will comply with the liability model.

We'll explain our liability model in more detail and how it will be implemented within the ecosystem.



12 Research and insight

At the Pensions Dashboards Programme, we use evidence to underpin our decision making. In October 2020, we outlined our research and analysis plan, which helps us to understand:

- 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 have commissioned a qualitative research piece, with potential users (and non-users) of dashboards.



Analysing the existing evidence base

The foundation of our research and analysis programme is understanding the existing evidence base.

In November 2020, we appointed the Behavioural Insights Team, to carry out a rapid evidence assessment (REA) of the existing domestic and international literature. We wanted to understand what works in increasing people's engagement

with their pensions via digital dashboards and to identify any priority evidence gaps from the existing literature.

We will publish the REA in late May. Initial findings suggest that research on pensions dashboards is in its early stages, with gaps in understanding how people will behave when they interact with pensions dashboards. Nonetheless, we can draw evidence and insights from the broader pensions literature and behavioural science to help guide the development of UK dashboards.

Ipsos MORI contract – qualitative research into user needs

In January 2021, we appointed Ipsos MORI to help fill priority evidence gaps for the PDP via a research call-off contract, for the programme's duration.

We have commissioned a qualitative research piece, with potential users (and non-users) of dashboards. It will help increase our understanding of user needs, including the motivations, attitudes and behaviours of individuals to their retirement planning. The qualitative research will also help us to understand how potential users may react to:

- information that is presented to them (and has been outlined in data standards publication)
- partial information about their pensions and
- envisaged system requirements and likely user journeys

Ipsos MORI contract – secondary analysis

Ipsos MORI is also starting work to quantify the size and nature of the population who will be using dashboards. This work will analyse social surveys to explore the nature of the prospective population for dashboards to build our understanding of:

- how many individuals have pension entitlements,
- the characteristics of individuals with different types of entitlements etc

Further research to support onboarding and monitor stakeholder awareness

In 2020, we carried out [qualitative research with large pension providers and schemes](#) to understand the issues and challenges they may face when integrating with the pensions dashboards ecosystem, and the data quality challenges of information necessary to support pensions dashboards. We will carry out further stakeholder research, building on this initial study that will inform and support our work around onboarding.

In parallel we have been working closely with the regulators to understand the landscape of pension providers and schemes, and pension entitlements.

Together, we will also engage with stakeholders to establish a baseline response from organisations about how aware they are of the programme and what actions they need to take prior to, during and following onboarding. This monitoring of stakeholder awareness and understanding will directly feed into our coordinated communications strategy, so that we can supply data and dashboard providers with the information and guidance they need.

What's next?

We will publish the results of the secondary analysis over the summer. We will use these results to inform our work on development of the programme.

We will work on the analysis of the Ipsos MORI qualitative study of users. We will feed the results of this qualitative research into our development of standards and processes.

We will continue to expand our evidence base, building on our earlier work, to ensure that our programme decisions have a firm foundation and that we are responsive to the needs of industry and our stakeholders.



13 Website and social media engagement

Our communications activity to date has focused on building our digital channels: our website, monthly email newsletter and our Twitter and LinkedIn accounts and establishing our presence with our key stakeholders, government, the pensions trade press and the pensions industry.

We have also built awareness via speaking engagements, online events and panel discussions and increasing our presence in trade and national media via press releases relating to milestones and thought leadership/comment pieces.

Our principle objectives are:

- to raise awareness of the work of the programme
- to demonstrate progress against our timeline and delivery plan
- to raise awareness of our approach to managing our risks and dependencies and resolving programme challenges
- to identify and engage with 'best in class' potential suppliers of the digital architecture and the identity service

to ensure they participate in our procurement exercises in order for us to build innovative and secure services

- to identify, engage with and drive action amongst data providers to establish relationships with early adopters and enable them to get dashboard ready
- to identify, engage with and drive action amongst potential dashboard providers to ensure that the design and implementation of the digital architecture and front-end services enables user-centred design and delivery

Over the last six months, we issued the monthly PDP newsletter to a subscription list of 1.2k.

It generates a high level of engagement with over a 43% click to open rate.

Visits to our website, pensionsdashboardsprogramme.org.uk and our social channels are also growing their reach.

Social and web user reach and engagement

LinkedIn

	Oct	Nov	Dec	Jan	Feb	Mar
Total followers	433	506	611	667	730	785
Views (reach)	3,042	8,543	10,833	7,036	7,696	8,602
Total engagements (likes/comments/shares/clicks)	221	523	591	290	529	543

NB. We issued the previous progress update report in late October and published data standards in December, which accounts for higher than average reach and engagement at these times.

Twitter

	Oct	Nov	Dec	Jan	Feb	Mar
Total followers	273	291	325	333	337	352
Views (reach)	12.8K	14.7K	17.2K	12.5K	10.9K	12.9K
Total engagements (likes/comments/ shares/clicks)	174	160	180	114	103	91

NB. We issued the previous progress update report in late October and published data standards in December, which accounts for higher than average reach and engagement at these times.



11.3k visits received to website
29.7k page views



1.2k total subscribers
43.7% average open rate
16.6% click through rate



69 participants attended
two hosted webinars

We also published the data standards suite of content, including the second in our series of explainer videos to help clarify what data standards are and how they will work. This was well received across the industry, with follow up communications generating engagement with our primary audiences.

We continue to collaborate with our delivery partners: TPR, FCA and DWP to align our communication activity, to best support the programme and its stakeholders.

What's next?

- we will continue to develop insight into our key audiences and communication strategies and plans to enable us to achieve our objectives
- we will develop our PDP content strategy further and ensure that it aligns with our delivery partners
- we will support the preparation for and delivery of the Consultation from the DWP and continue to align our communications plans
- we will create a joint communications strategy with DWP, FCA and TPR
- we will take a proactive approach in engaging with pension data providers as they prepare to comply with new duties
- we will continue to support the key milestones of programme activity, such as the ongoing procurement work
- we will continue to develop and publish accessible content to explain our work and promote our programme activity to our stakeholders and beyond
- we will build stakeholder perception tracking research into our communications and engagement strategy

