

Pensions Dashboards Programme

Progress Update Report



October 2021

About us

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.

Vision

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".

What is a pensions dashboard?

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

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

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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

Change is all around us at the Pensions Dashboards Programme. With the appointment of Capgemini with Origo to supply our digital architecture, we have moved from the initial mobilisation, to the develop and test phase of the programme. Our core team of over 40 people, plus colleagues in the Money and Pensions Service, now works alongside the supplier team, making this a sizeable enterprise.

As the size and shape of the programme changes, we need to change how we work within it. Richard James, our new Programme Director has had to hit the ground running, overseeing the procurement process as well as restructuring the way the team works, to suit this new phase.

PDP continues to undergo significant scrutiny – both official and unofficial. We received a favourable report from the government’s Infrastructure and Projects Authority (IPA) review over the summer, which examined the full programme, with a focus on the business case for the central digital architecture. The report described our timeline as ‘ambitious’ but with the right team in place to achieve it.

Pensions dashboards are ambitious and PDP is a complex programme that requires support from industry, government and the regulators. That’s why it’s so great to see positive collaboration taking place already, with the seven major pensions organisations that signed up to take part in our initial testing phase. Their contribution will help streamline the onboarding process, to improve the process of connecting to dashboards for other providers and schemes.

We fully recognise that not all providers are ready to connect yet and taking the necessary steps to prepare for dashboards will be challenging for many. But time moves fast and with the programme now firmly in its delivery phase, compulsory staged onboarding for data providers will soon be upon us. So I would strongly encourage all parts of the industry to start taking steps to prepare now – find out how in the [data providers hub on the PDP website](#).

We will support you with that preparation in every way we can. We remain committed to operating in an open and transparent way, and will provide regular updates on what we learn during our testing process.

At PDP, we need to walk the line between the ambition to provide a fully-realised service to individuals and what we, together with the pensions industry, can realistically deliver. We know that some issues, such as estimated retirement income, generate a lot of debate. And we will do all we can to provide a positive solution, although we know that we cannot satisfy all parties.

I am repeatedly impressed by the dedication of the PDP team and proud to see the strides that the programme has made over the last six months. It may be a time of change but it is all progress. I hope you enjoy the report.

“

I would strongly encourage all parts of the industry to start taking steps to prepare now – find out how in the [data providers hub on the PDP website](#).

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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 (PDP) 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 fourth progress update report and provides a summary of what we have achieved since April 2021, when we published our last report.

Focus and priorities

Signing the contract with Capgemini to supply our central digital architecture marked the end of a busy period of procurement activity, following extensive supplier engagement and input from the pensions industry. It also marked the beginning of the develop and test phase of the programme.

The main focus for the programme over the next six months is the build of the digital architecture, procurement and integration of the identity service and the onboarding of alpha test participants and further testing of the ecosystem.

We announced that [seven major providers had signed up](#) to be part of the alpha testing phase, which will start in December 2021. This is a significant milestone for PDP, as we're heavily reliant on industry cooperation at this stage.

We have started the process to recruit potential [dashboard providers to our alpha testing phase](#). This is ongoing and we will announce the results of the process in the next few months.

PDP has started procurement of an identity solution, having defined the requirements for the service. Ultimately, we want to provide an identity service under the [government's digital trust and attributes framework](#), which will not be available for the next two years, so we will work with an interim provider in the short term during our test phases. We will appoint a provider and integrate the identity service with the rest of the central digital architecture early next year.

Upcoming activity

Develop and test phase

PDP's develop and test phase started in September and runs through to summer 2022. It incorporates the discovery phase with Capgemini and Origo and initial (alpha) testing.

Discovery phase

The discovery phase with Capgemini, plus its subcontractor, Origo, runs until November this year. This will include agreeing a governance structure, ways of working and acceptance criteria with MaPS, setting up the collaboration agreement and preparing, refining and issuing the deliverables outlined in the tender document.

PDP will also work on the onboarding and complaints processes, building on MaPS' user research.

Externally, we will support the Government Digital Service (GDS) assurance and engage cyber security assurance and design support from the National Cyber Security Centre (NCSC), including planning for future penetration testing.

We will seek further input into the data protection impact assessment. More detail is available on our [consumer protection pages](#).

We will also run a selection process for dashboard providers to be part of the alpha testing phase ([see dashboard providers section for detail](#)).

Alpha testing phase from December 21 – June 22

The alpha testing phase of the programme will start in December, for a six-month period. In addition to the building and testing of the digital architecture, PDP will conclude the identity service procurement. We anticipate awarding contracts and having a supplier in place in the new year.

During alpha testing, PDP will work with Capgemini, Origo and the identity service provider to continue the build of the digital architecture, while testing and refining the onboarding process via the experience of the alpha participants.

We expect to learn a huge amount during this phase, as we take dashboards from the drawing board and build the technology to deliver them. We will also learn a great deal about how to support data and dashboard providers during the onboarding process, including flushing out practical issues that providers may encounter and learning how best to tackle those.

We'll use all that learning to test our plans and timetable for the rest of the programme, to ensure that we are giving industry the most effective support possible. In the subsequent beta testing stage, we'll work with a bigger population of providers and later we'll move on to the compulsory stages of onboarding for data providers.

Other activity

We will also continue to:

- work on design standards for pensions dashboards
- carry out further user testing to continue to 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 progress and support the consultations on secondary legislation, and corresponding rules
- 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

Summary of progress over the last six months

The programme has moved forwards significantly over the last six months. Key achievements are listed below:

- **digital architecture procurement** we have run the procurement process for the central digital architecture, with the successful bidder, [Capgemini awarded the contract in September](#)

- **supplier onboarding underway** – the process of onboarding Capgemini and Origo has started, with activity ongoing to establish ways of working as we move into the develop and test phase of the programme
- **seven major pension organisations signed up to alpha testing** – the software providers, insurers and third party administrators will work with the programme to refine the onboarding process, with further organisations lined up for beta testing phases
- **staging proposals outlined in call for input and webinars** – we outlined the thinking on the order and timing of when pensions organisations will have to connect to dashboards, which met with a largely positive response – the feedback will input into DWP’s consultation this winter
- **publication of online data providers hub** – to support pension providers and schemes to prepare for onboarding to the pensions dashboards ecosystem
- **engagement commenced with potential dashboard providers** – in addition to the MaPS dashboard, PDP will work with other parties interested in becoming dashboard providers during the testing phases. We have created a [dashboard provider hub](#) and started the process to recruit test participants
- **established new working groups** - our new [ecosystem technical working group](#) helps refine the technical standards for data and dashboard providers to connect to the ecosystem. We’ve also established a working group for our alpha data provider participants
- **developing user centred design standards and service standards** – we have commenced UX testing, which will feed into the design standards for dashboards, as well as starting work on prototypes for further testing
- **identity service procurement** – we finalised our requirements for the identity service, following further feedback from stakeholders. A [procurement exercise starts next month](#) for an interim service, for our testing phases.
- **publication of an identity hub** – which explains more about our approach and the [government’s trust and attributes framework](#), which is central to our final identity service solution
- **consumer protection** – we have continued to develop our policy thinking around consumer protection, we set this out in our [September publication](#), which explains more about the liability model and complaints handling
- **governance** – we have successfully gained the necessary government approvals for all procurement activity to date. Our review by the Infrastructure and Projects Authority (IPA) focused on the business case for the central digital architecture and PDP received an amber rating, which is positive for the programme at this stage
- **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, technical expertise and project management including a new Head of Engagement
- **research and insight** – we have published [a summary of our first stage of qualitative research](#) to further define the pensions landscape, expand our evidence base and define user needs

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Core architecture delivery

On September 3, PDP signed the contract with Capgemini to supply the central digital architecture for the programme. This includes building the pension finder service, consent and authorisation service and governance register, as well as other specified deliverables, such as a complaints service.

This was the end of a procurement process that the programme had built towards over the previous year, following extensive engagement with industry and potential suppliers, keeping in mind the needs of the end user, plus consultation with government and the regulators all leading to the development of the technical requirements.

We set out the procurement programme in detail in the [previous progress update report](#).

As the programme moved into the develop and test phase, PDP started the process of onboarding the supplier, with regular meetings to coordinate the delivery of the digital architecture, ways of working and requirements with PDP's technical teams.

The technical teams have created user stories for the digital architecture, which the supplier will use to design and build the architecture. Each component of the architecture (pension finder service, consent and authorisation service, governance register, interfaces) will be iterated and rigorously tested, before integration with the other components.

What's next?

Following the definition of the delivery plan during the initial discovery phase, the supplier will continue to build and test the digital architecture. PDP and the supplier will work on the onboarding and complaints processes, as well as building the reporting capability and setting up an interim testing environment, before onboarding the first volunteer data providers.

The alpha testing phase is due to start in December, during which we will develop and test the system and work with volunteer data providers.

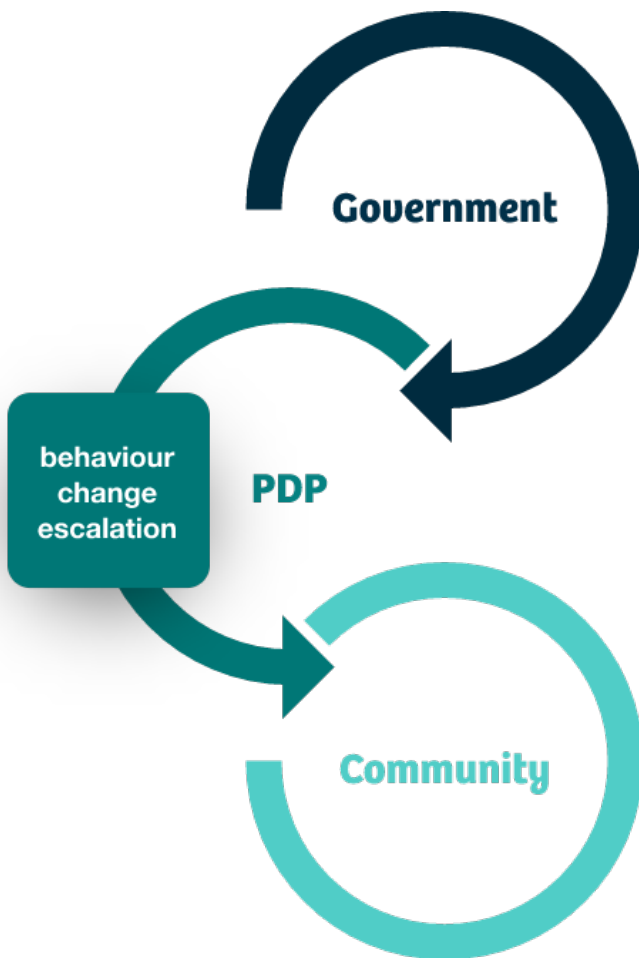
The identity service will be integrated with the rest of the ecosystem early next year, enabling end to end testing of the system.

Joint working with the regulators to develop requirements

PDP is working closely with the regulators, TPR and FCA, to support the development of the governance register, reporting and monitoring feeds to and from the pensions dashboards ecosystem.

Ecosystem governance strategy

The pensions dashboards ecosystem will have a robust system of governance to ensure that it is safe for end users and organisations connecting to the ecosystem. This will include measures such as gatekeeping of the organisations that can participate in the ecosystem and monitoring of participant behaviour. Over the last six months, PDP has defined the governance strategy, which is the structure that we are setting up to make this happen, as outlined below.



Government will hold ultimate responsibility for the ecosystem, supported by the regulators.

Initially, PDP will provide the day to day governance and oversight for the ecosystem. Key to this is the governing of both participant behaviour and change:

- **behaviour** – the PDP will provide oversight and monitor participants adherence to service levels, issues and disputes
- **change** – both product and technology will be the responsibility of the PDP
- **escalation** – where either intervention from a regulator is needed or changes that have regulatory impact

Community represents a peer group of participants, which will provide a level of self-governance, facilitated by PDP, and input into changes to both the product, technology and standards. As building blocks to creating a community, PDP has set up a number of industry working groups to support the programme, sharing insights that could make a concrete difference to the success of the programme.

We discuss further consumer protection measures in our [consumers section](#).

What's next?

PDP will continue to work with government and the regulators to implement the ecosystem governance strategy. We will continue to work with the pensions industry to build the pensions dashboards community activity.

4 Identity service

Over the last six months, PDP has continued to develop the requirements for the identity service, which will verify that users are who they say they are. While the identity service is part of the central digital architecture that will make pensions dashboards work, we will procure this as part of a separate process.

Call for input on the PDP approach

PDP issued a call for input on proposed standards and approaches for the identity service, which ran until April. We were pleased with the number of responses and found the nature of the submissions incredibly helpful in confirming or challenging our thinking to date.

We identified the following from the responses:

- a. we need to provide further information on the architecture, and the identity service position within it, to promote wider understanding of this
- b. we need to promote deeper understanding of the government's Good Practice Guides to ensure informed feedback
- c. some respondents called for a higher level of confidence in identity than that proposed by PDP, which the team will validate and assess within the alpha test period
- d. liability and the role of the ICO are key for some providers in understanding their liability

To address the need for greater information and understanding, we have created [an identity service information hub on our website](#). The identity service hub is a resource that will provide ongoing updates on the identity service and the programme's approach to its delivery.

UK digital identity and attributes trust framework

The UK government aims to make it quicker and easier for people to verify themselves using modern technology, with a process as trusted as using passports or bank statements. The Department for Digital, Culture, Media and Sport (DCMS) is developing the [UK digital identity and attributes trust framework](#), as part of this ambition.

The trust framework is a set of common rules, including legislation, standards and guidance that different organisations can agree to follow, to deliver one or more of their services. All organisations using the trust framework can describe digital identities and attributes they've created in a consistent way. This should make it easier for organisations and users to complete interactions and transactions or share information with other trust framework participants.

We explain more about [the trust framework in our identity service information hub](#).

PDP considers this trust framework as pivotal to the creation of a cohesive and interoperable identity market for the UK. As such, we would prefer our identity service to be supported by the governance and rules of the trust framework.

What's next?

We expect the trust framework to be in place in 2023, which is too late for PDP's testing phases. As a result, the programme is in the process of procuring a single identity provider as an interim measure, which will support our testing phases and help prove the functionality of the central technical architecture. This procurement will lead to the award of a contract this winter, in line with our previous updates.

We will undertake the procurement under G-Cloud 12, through the Crown Commercial Service, with the aim to award a contract for two years, to start from January 2022.

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Data provider readiness

As a programme, we remain committed to supporting data providers with what they need to do to ready themselves for onboarding. We are entering an exciting stage of development as we begin the work to build the pensions dashboards ecosystem and enter our alpha stage of testing.

Together with DWP, TPR and FCA, we are holding quarterly meetings with industry bodies, such as ABI, PASA, PLSA and SPP to ensure open dialogue between the programme, our delivery partners and industry. The meetings are a valuable opportunity for us to update the industry on our progress and to receive feedback relating to any opportunities or challenges that this presents the industry.

We recognise data providers are at different stages of readiness, with some committed to early connection as part of testing our digital architecture, while others are yet to start preparing to onboard. The call for input we issued in May provided the first indication as to likely compulsory staging dates but we would urge all providers to get ready to connect to dashboards as soon as possible, as there are many benefits to early staging.

Data providers hub

To keep data providers informed about what they need to do to ready themselves for onboarding, we have created a [data providers information hub](#) to hold all the vital information that they will need to prepare, including steps to connection plus further explanation of the pensions dashboards ecosystems.

As we enter the key develop and test phase we will continue to keep the data providers hub updated with developments and also to share key experiences gained through the alpha phase of testing.

Onboarding

In our last update, we reported that we were working with the pensions industry to encourage providers to onboard early to the pensions dashboards ecosystem, as part of our testing phases.

In July, we announced that seven organisations have agreed to work with us during the initial (alpha) testing phase of the programme. The organisations include software providers, insurers and third party administrators. Collectively they provide software or pension administration solutions to a broad range of public and private sector pension arrangements, covering defined contribution, defined benefit, hybrid and regulated pension provision. We're very excited to be working with those providers.

The participating providers are:

- Aquila Heywood
- Aviva
- Capita
- ITM
- Legal and General
- Mercer
- Phoenix Group

What's next?

During initial testing, PDP will work with these organisations to:

- develop dashboard technology
- ensure that its processes make onboarding as easy as possible
- share the learning that it derives from this work across the pensions industry, to help all providers to prepare for connection to dashboards

This initial (alpha) phase of testing will begin in December 2021 and will continue until June 2022.

At the end of alpha, the participants will transition into beta testing, with live data. At that point we will invite other organisations to join subsequent testing phases.

We anticipate that the experience gained through the initial alpha testing phase will enable subsequent testing participants to progress more quickly through the process and help create a proven and efficient onboarding approach.

We already have a number of confirmed participants for the next phase of testing but remain keen to speak to organisations to schedule their early participation in testing, to ensure they have adequate time to prepare, particularly for those who will have early exposure to staging.

Call for input on staging

Staging refers to the process by which pension schemes and providers will be compulsorily onboarded to the ecosystem, as a consequence of DWP regulations and FCA rules.

PDP issued a call for input (CFI) on staging, which ran from May 27 to July 9, following our work with our regulatory and government partners to develop an initial set of draft recommendations on how staging might work.

The recommendations were not a formal legislative proposal but formed a valuable exercise, to gather key stakeholders' feedback, evidence and insights, to help inform government and FCA policy development.

The recommendations aimed to achieve the widest possible coverage, as quickly as possible, while taking into account the practical constraints and circumstances within the industry as well as regulators' and PDP's capacity limits.

We proposed that staging should take place over three waves:

- wave one, from April 2023: occupational schemes with 1,000+ members and FCA regulated providers of personal and stakeholder pensions
- wave two: medium occupational schemes (100 to 999 memberships)
- wave three: small and micro occupational schemes (99 or fewer memberships)

This approach would achieve connection of 99% of pensions in scope for dashboards in the first wave, within two years.

There was broad agreement with the proposed sequencing for schemes and providers to be connected into the ecosystem, together with a prevailing view that the overall proposed approach is logical and reflects the policy objectives and staging principles well.

However, several respondents indicated that the timeline may be too ambitious, with most respondents indicating their lead-in time would start from the point of sufficient certainty (ie regulations in place) and full technical specification.

We issued a summary of the [CFI response](#), which contains a full breakdown of the responses.

Key areas of feedback included:

Estimated retirement income (ERI)

In light of the challenge for consumers making sense of incomparable values in view data, several respondents advocated for launching with a find-first approach to reconnect people to their pensions first, and add estimated retirement income later. The rationale would be to allow time for standardisation, as well as for industry readiness reasons and to allow testing of the matching process first. However, other respondents advocated for estimated retirement income being available from day one.

Taking the feedback on this issue into consideration and the extent of the concerns evidenced, we are undertaking user testing of prototypes for different 'view' propositions, to explore different ways this could be approached, to aid the DWP's decision making.

Use of integrated service providers (ISPs)

Responses on the use of ISPs show that they are the preferred method for connecting into the dashboards ecosystem, which is consistent with other industry feedback we have received. A number of data providers are looking to work with their software providers or third party administration firms in the first instance but others are considering the broader ISP market before reaching a decision. Some larger organisations have indicated they will create their own ISP solutions, where they have the in-house capability to do so.

What's next?

We're working with government and the regulators to feed the evidence and insights gathered from the CFI into staging policy development, ahead of the DWP's consultation this winter, and the FCA's corresponding consultation on rules.

It is ultimately for the government and regulators to determine the staging approach and legislative framework. Once published, we will assess how that may impact on our planning and testing approach, particularly for those data providers that choose to stage early.

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Dashboard providers

The Money and Pensions Service (MaPS) will create a pensions dashboard, as required by government. We expect other organisations to create dashboards, as permitted by The Pension Schemes Act 2021. All these dashboards must meet the qualifying conditions that government will set in regulations.

Government has committed to making the provision of a qualifying pensions dashboard a regulated activity under the Financial Services and Markets Act 2000 (FSMA). Once it makes the appropriate legislative change, any entity that wishes to provide a qualifying pension dashboard must obtain FCA authorisation to do so.

As PDP moves into the develop and test phase of the programme, we are increasing our engagement with potential dashboard providers. We have created a [dashboard providers hub](#) on our website, which provides information and support with onboarding potential dashboard providers to the ecosystem. We will update this guidance regularly, as we gather further information and learn from our testing process.

In September, we started the selection process of possible dashboard providers to take part in our initial alpha testing of the ecosystem, which will begin in December this year. The MaPS dashboard will be part of this stage of testing and we will select up to three other potential dashboard providers to work with us during the alpha testing phase. We also started planning for how further participants can take part in the second, beta phase of testing.

Following their selection, we will start working with the alpha-phase dashboard providers to prepare them for early onboarding to the dashboards ecosystem in early 2022, in order to test the connectivity of the system.

What's next?

We will make a testing environment available for those organisations that are interested in exploring the service, to develop and refine their proposition in a safe environment, before applying for authorisation from the FCA.

Consumer protection, including the safety of users' data remains at the forefront of our testing activity. And the insights from our testing will help inform the FCA's rules for authorised dashboard providers, which it will consult on next year.

We are committed to an open sharing of any insights gained from testing during the alpha phase, together with any updates on the design guidance and technical standards.

Development of a user-centred design

PDP is committed to developing a user-centred design (UCD) for dashboard services, to ensure that consumers will have a positive user experience that is efficient and effective.

A central part of this involves developing design standards and guidance from a service design process, so that pensions dashboards will fully answer users' needs. These design principles will ensure a uniformity of experience, irrespective of which dashboard an individual chooses to use.

User research

Our interviews with potential dashboard users started in July and are ongoing. The user research covers a number of different topics, which all feed into the development of the service.

We undertook an information architecture project and some usability testing, to ensure that users understand the terminology we use on dashboards.

In order to develop the design standards, we will continue to undertake user research to understand dashboard users' needs: for example, what would make the dashboard service easy to use and what is the best way to present information in a clear and unambiguous way. The results of this research will feed into the service design.

We have built a prototype to help us understand the user needs, which we will test with users. This is not a full system but instead a series of visual mock-ups, which allows us to test how users find and interpret information, in order to feed this back into the overall design.

Our user research also allows us to test key design and display questions, such as estimated retirement income (ERI), for example. We have started to work with the user to help us understand how we can present projected pensions in way that is clearly understood by the user, as well as how we can deal with gaps and delays in pensions information being presented to the user.

We also carry out programme research, which feeds into our wider understanding of attitudes towards pensions dashboards. You can read about this in our [Programme research and insight section](#).

What's next?

We will continue our user research, to test different presentations of information and feed that into the service design. Having established the user needs, PDP will test the full prototype with users. This is an iterative process and analysis of the usability testing will feed back into the design, to inform the development of the central digital architecture.

We will undertake comprehensive iterative testing to ensure our design standards meet user needs.

We will continue to work with the Usability Working Group and external stakeholders on development of the design standards and share findings on the dashboard providers' hub.

Usability Working Group

The Usability Working Group has met monthly over the past year, to focus on user needs. As the programme develops and moves into the develop and test phase for the central digital architecture, we are reviewing the structure and purpose of this group.

What's next?

Now that our work has moved into the user research and usability prototype testing, we are hoping to welcome new members, who will be able to contribute with their specific experience in these areas.

If you have specific experience in these areas that you wish to share, please contact: eventsdpdp@maps.org.uk for more information.

MaPS dashboard development

PDP continues to work closely with the MaPS teams building the front-end dashboard. In July, the MaPS team published its qualitative research, which complements the PDP research work and explored:

- attitudes, behaviours, needs and expectations of potential dashboard users
- what additional guidance and support users need beyond a view of their pensions data
- what consumers would want to do upon seeing dashboards to inform customer journey design
- how open users would be to creating a profile

You can access [the MaPS research here](#).

Since May, the MaPS dashboard team has completed:

- a. the build of the customer journey map (to identify customer needs and pinch points by touchpoint)
- b. definition of the service blueprint, the customer end to end journey,
- c. the landing page design and consumer testing cycle for alpha
- d. the collection of MaPS business requirements for the customer log-in and registration journey

Following MaPS and DWP business case approval, we started procurement of API gateway, identity and alpha build services. We signed contracts in September and started onboarding suppliers in early October.

At the end of September, we commenced commercial activity to procure data governance services, which will enable MaPS to provide assurance on all data handled through the PDP program.

Over the coming weeks the team will focus on designing the supporting information pages on the alpha site and pensions dashboard environment concept design and supplier selection, contract negotiation and onboarding activities.

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Consumers

Over the last six months, the main focus of this workstream has been consumer protection. The programme aims to ensure data protection by design, building in best practice to the ecosystem, to ensure the safety of any data transferred within it. We also want to ensure consumers understand the information they receive via dashboards, which is why we're carrying out extensive user testing, which will feed into design standards.

We have detailed our [work relating to consumer protection](#) in a September publication, which covers activity across the programme.

Over the last six months, we have worked with our delivery partners and the pensions industry to refine our analysis of potential consumer harms and how to mitigate them within the dashboards ecosystem and beyond.

We have completed our work on the liability model for the digital architecture, which addresses gaps not already filled by existing routes to redress (against dashboard providers and pension providers) and includes a requirement of our supplier to develop a complaints handling procedure, as well as to accept users' complaints of inadequate service against the digital architecture.

We have also started work on the data protection impact assessment (DPIA), initially focusing on the processing of data within the digital architecture. This work has fed into the requirements for the central digital architecture.

What's next?

We will continue to work with the Department for Work and Pensions, HM Treasury, the Financial Conduct Authority, The Pensions Regulator and with industry and others, to ensure the correct protections for consumers are in place in relation to pensions dashboards.

We will continue to work with the supplier on creating the complaints handling process for the digital architecture.

We will expand the DPIA to cover the whole of the pensions dashboards ecosystem.

As the programme moves into its next phase, with the onboarding of the supplier for the central digital architecture and testing of the ecosystem, the consumer workstream will also work on a strategy for recruiting consumers to take part in this process.

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Programme research and insight

Our research and insight underpins decision making across the programme. Our research and analysis plan 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 also carry out a programme of user research, which informs our understanding of user needs and will feed into the service design. You can read more about the section on [Dashboard providers](#).

Analysing the existing evidence base

In June 2021, we published a [rapid evidence assessment](#) (REA) of the existing domestic and international literature on what has worked in increasing people's engagement with pensions via digital dashboards, carried out by the Behavioural Insights Team. The key findings from the REA were:

- the research in this area is in its early stages with many gaps
- there is lots of evidence on the barriers to engaging with pensions and how to increase engagement with pensions, some of which can be directly applied to dashboards
- there is some evidence on how to display information on dashboards and digital interfaces to increase understanding
- there is limited evidence on what user needs and user behaviours are and what information and functionality individuals need to see to increase their engagement

Following on from this research, we commissioned further work via Ipsos MORI, who we appointed in January 2021 to help fill priority evidence gaps for the programme.

Qualitative research

In August 2021 we published [a summary report of the findings of the first phase of our qualitative research](#).

Phase one fieldwork looked to:

- update the findings from various previous pensions dashboards research studies
- explore the appeal of the pensions dashboards concept itself
- examine views on potential dashboard display contents
- understand attitudes to particular elements of the envisaged customer journey
- investigate high-level needs and tolerances for an initially incomplete service

The key findings from the research showed that, broadly speaking, the pensions dashboards concept was received well and viewed as a big improvement on the current situation, confirming the findings from previous studies. The pandemic has changed some attitudes and behaviours, particularly bringing many more people into regular digital service usage. And the research found that pensions dashboards have the power to help increase pensions engagement among different groups of people.

We will publish a final report, following the completion of the second phase of fieldwork in the autumn that brings together the findings from both phases of the research. The aims of the second phase of the research are to:

- explore the appeal of the pensions dashboards concept for a range of potential dashboard users (including self-employed and joint decision makers), specifically the appeal of a find first service vs a find and view service

- identify potential usage purposes and occasions as well as provider and platform preferences
- identify information expectations and priorities
- investigate potential dashboard users' tolerances to the prospect of a phased launch (specifically in relation to the potential staged onboarding of pensions providers as well as the potential staggered return of pensions information)

Secondary analysis

Ipsos MORI have started work to quantify the size and nature of the population who will be using dashboards. This work is analysing two waves of the Wealth and Assets Survey, 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

What's next?

We will use the findings from the qualitative research to feed into policy development of the draft regulations that will be consulted upon over the winter by the DWP.

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.

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Programme governance and assurance

PDP has an established governance structure, which we outlined in our last report. You can find out more about [how we are set up on our website](#).

The Pensions Dashboards Programme is complex and its success relies heavily on collaboration with our delivery partners in government, industry regulators and the pensions industry itself. PDP holds monthly risk meetings, to monitor how our progress affects ongoing risks to the programme, in addition to the ongoing assurance provided by our governance groups.

We asked representatives from two of our governance groups about their contribution to working on the programme. Their contributions are below – please bear in mind that they hold diverse opinions, which do not necessarily reflect the view of the Pensions Dashboards Programme, government, DWP or MaPS.

Kim Gubler sits on our Steering Group, which is a strategic body, made up of pensions industry, consumer and fintech representatives, who hold a range of differing views. It is responsible for informing the design and delivery of the entire dashboards ecosystem.

Being on the PDP Steering Group has been a really interesting experience for me. I'm passionate about helping to drive this initiative, as are all my co-Steering Group colleagues. It's been an eye opener witnessing such an important government technology project develop, a massive amount of work has been done but there's so much more to do. The Steering Group isn't a decision making body, but that doesn't mean we aren't consulted and listened to.

I represent PASA on the Steering Group and, as such, I tend to look at the 'how' of dashboards – both operationally and for members. When an issue is particularly complex or multi-dimensional, I also consult with PASA's Dashboards Working Group. This means I can bring my own experience to the table as well as drawing on PASA's wider (and technical) expertise.

Each of us on the Steering Group brings different skills and perspectives to the table. This means the project is subject to diverse challenge, making it more robust. This threads through from the operational, to Fintech and the consumer.

Although clearly this is a government project, industry-specific skills are needed to ensure dashboards deliver on the promise. We don't always agree, but having access to such a range of experiences and views means our input is multi-dimensional. On a personal note, this has been great for me as it's pushed me out of my comfort zone and made me view solutions from all sides. I look forward to the time when looking up your pension details on dashboards is simply part of everyone's life.

Kim Gubler, Director, KGC Associates

Ann Harris sits on the sub-committee of the MaPS board, which has the delegated authority to direct the work of the programme, hold it to account and take investment decisions.

Working as a member of the sub-committee is both challenging and rewarding.

Overall, the committee reports to the MaPS Board, but it has delegated authority to direct the work of the Pensions Dashboards Programme (PDP) and to hold it to account. The sub-committee provides assurance to the Board that the programme is on track to deliver within plan, cost and timetable and recognise its priority within MaPS overall corporate plan. It is also important that the sub-committee ensures that PDP's remit is in line with the broad strategic framework of MaPS, that its business case is robust and that it has the necessary resources to deliver.

As a sub-committee member, I am expected to challenge proposals from the programme, provide expert advice within my knowledge and skillset, provide opinion or contribute to decisions in a timely manner. Each sub-committee member brings their own unique expertise to bear. In my case, that includes bringing experience of managing transformation programmes within government, business cases and in the context of MaPS, assessing any additional risks that proposals may add to the programme and ensuring that there are adequate controls and linkages in place to the overall governance oversight within MaPS.

The programme is complex with many external dependencies, which increases the risks that it has to manage but also make it incredibly interesting.

Ann Harris, Non-executive director, MaPS Board

Strengthening governance arrangements

PDP joined the Government Major Projects Portfolio (GMPP) in February. The GMPP comprises the largest, most innovative and highest risk programmes and projects that are being delivered across government.

We are working closely with the Infrastructure and Projects Authority (IPA) to provide much of our independent scrutiny, assurance and advice. The IPA sits at the heart of government and is responsible for supporting the successful delivery of all types of major projects and programmes.

We undertook an IPA review in July 2021: a key point in the programme lifecycle, as we pivoted from mobilisation to delivery. The review was scoped around our progress towards procuring a supplier for the central digital architecture, and more broadly the deliverability of the programme.

The outcome of the review was an amber assessment, which is in keeping with the outcome of our previous, DWP-led, review in September 2020.

This assessment recognises, and balances, the complexities and risks associated with delivery and the progress made. We have a number of recommendations to meet over the coming months as we prepare for the next stage of delivery.

Procurement governance approvals

Key Achievements

- PDP successfully secured all government approvals necessary to enter into contractual agreement to deliver the programme's central digital architecture.
- Capgemini announced as the successful bidder on 9 September and onboarding of this supplier is ongoing
- approval gained to proceed with procuring a third-party supplier to provide an identity service, expected to start this winter

PDP has completed the relevant documentation to obtain the associated approvals to proceed with two procurement exercises. The first procurement exercise, for the central digital architecture, received approval to proceed in April and successfully completed when contract and spend control approvals were received. The contract with Capgemini was subsequently signed on 3 September.

The identity service procurement is on a different timeline and we have received the necessary approval to start the exercise. Subject to receiving the necessary contract approvals, we envisage signing a contract this winter.

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Partner organisation activity

Department for Work and Pensions (DWP)

As detailed in the previous update, the Pension Schemes Act 2021 allows DWP to compel pension schemes to make individuals' data available to them via dashboards, whilst ensuring dashboards are properly regulated.

The Act provides scope for innovation and to engage a broad range of users by allowing for multiple dashboard service providers. The Money and Pensions Service will also develop and host a publicly-owned dashboard.

State Pension information will feature on pensions dashboards to give people a comprehensive view. DWP has already made the necessary changes alongside colleagues in HM Revenue & Customs and will continue to progress this work, to ensure that the infrastructure required to provide State Pension information will be in place ahead of the first publicly available dashboards.

DWP continues to work closely with its delivery partners to develop secondary legislation. This collaborative working is essential to advance the legislative position, informed by user research, insights from the regulators and building on extensive engagement with industry and other interested parties. This includes the recent Call for input on staging led by the Pensions Dashboards Programme.

The DWP plans to consult on its proposals for secondary legislation with interested parties this winter, focusing on data requirements, staged onboarding, the compliance regime and consumer protection. DWP's aim is to lay draft regulations before Parliament for debate in 2022, to remain on schedule to support the delivery plan set out by PDP, which indicated that the first pension schemes

will be compelled to make data available to users via dashboards in 2023.

The regulators working together

The regulators are preparing for duties to go live in 2023 through:

- providing input and advice to the DWP on the design of the legislative framework
- providing insights on their regulated communities to inform the staging proposals put forward in the call for input
- exploring in increasing detail the systems and data they require from the ecosystem so they can deliver their functions

FCA

The rules the FCA will make for the providers of personal and stakeholder pension schemes will take account of the corresponding legislative framework that the Government will introduce for occupational pension schemes. FCA will consult on those rules in due course, but it is clear there are steps firms could take now to prepare for dashboards. The FCA encourages the pension providers it regulates to engage with the material on the PDP's [data providers hub](#) at the earliest opportunity.

The government has committed to making the provision of a qualifying pensions dashboard an activity that is subject to FCA regulation. Therefore, when the appropriate legislative change is made, any party that wishes to become a pension dashboard provider must obtain FCA authorisation to do so. Once authorised, the pension dashboard provider will be subject to FCA regulation.

The FCA will consult next year on the full set of regulatory requirements. The consultation will:

- have regard to the emerging detail of the ecosystem design and build
- take into account its role in the areas of shared responsibility on which it is working collaboratively with PDP, MaPS, and TPR and government
- be informed by PDP's user research and prototype testing

Parties interested in becoming qualifying pension dashboard providers can [find further information about the standards that apply to all FCA regulated firms here](#).

TPR

TPR recognises that preparing for dashboards is a significant enterprise for the thousands of pension schemes it regulates, and their advisors/service providers.

TPR is gearing up to provide clear, targeted and timely education to trustees and managers on their new duties from 2022. It will also be engaging with the advisors and service providers, which trustees depend upon, to ensure trustees receive the support they need.

Pensions dashboards' success depends on schemes' participation, so in addition to planning education and engagement, TPR is also working to define and deliver the operational processes it will need to monitor, and if necessary, enforce, compliance with the duties from 2023.

