

# Consultation:

standards, specifications  
and technical requirements

July 2022

## Contents

1. Foreword.....	2
2. About this consultation .....	3
Purpose of the consultation .....	3
Standards and guidance included within this consultation .....	4
Call for Input: Design Standards.....	4
Duration and timetable .....	4
Who is this consultation aimed at .....	4
How to respond to this consultation.....	5
Consultation principles .....	5
Confidentiality and data protection .....	5
3. About the standards and guidance .....	6
Standards and guidance included within the consultation .....	6
Statutory guidance .....	6
‘Recommended’ guidance .....	6
How we have developed these standards .....	6
Power to set the standards .....	7
DWP consultation response .....	7
Interaction with the FCA and HMT’s consultations.....	7
Adherence to the standards .....	8
Appendix A: consultation questions.....	9
Appendix B: summary of all consultation standards and guidance .....	13

## 1. Foreword

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Pensions dashboards have the potential to transform retirement planning and engagement with pensions. For the first time, everyone will be able to use a simple and clear online service that shows their State and occupational or personal pensions, all in one place. Once available, people of any age will be able to get a holistic view of their expected retirement income.

Dashboards will become an essential tool for retirement planning, but more than that they have the potential to engage people much earlier with their pensions. The possibilities to increase pensions savings and support earlier retirement planning are significant and dashboards will fundamentally empower consumers to build an understanding and take action or plan for later life.

In order for dashboards to fulfil their true potential and deliver this transformation to pensions engagement, the consumer experience needs to be protected and uniform. To achieve this, the foundations must be solid and pension providers and potential dashboard providers will need to prepare for the work ahead and connecting to the dashboards ecosystem.

This consultation is an important step to support industry to prepare for dashboards and the standards aim to provide the solid foundation for this challenge. **The purpose of these standards are** to ensure the security, stability, and effective operation of dashboards. They set out the technical and operational detail underpinning the primary and secondary legislation and outline the requirements for all pension providers and dashboards connecting to the ecosystem.

Our aim is that the standards and supporting guidance included in this consultation will enable both pension providers and potential dashboard providers to prepare for the connection and meet their dashboards duties. In this consultation we ask a range of questions to support refinement of the standards ahead of final publication. All pension providers and qualifying pensions dashboard services must adhere to these standards, so it is essential that they provide the right levels of clarity and detail

Delivering dashboards to provide the maximum benefit to consumers requires a dedicated effort across industry, Government and MaPS and the regulators. The standards, and adherence to them, ultimately set the end consumer experience and we are inviting inputs to help shape this work.

## 2. About this consultation

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### Introduction

Pensions dashboards will help individuals view their pensions information online, securely, and all in one place, thereby supporting better planning for retirement and financial wellbeing. Pensions dashboards are apps, website or other tools which will bring together all an individuals' private pensions (including public sector workplace pensions) and their state pension, in one secure place online.

The Money and Pensions Service (MaPS) established the Pensions Dashboards Programme (PDP) in 2019 to be responsible for designing and creating the pensions dashboards ecosystem, which contains the digital architecture that will make dashboards work. The PDP is a function of MaPS and is responsible for building and maintaining the central digital architecture (CDA) and the governance framework to support and enable the implementation and the operation of multiple pensions dashboards. This will make dashboards possible, connecting millions of individuals to their information on thousands of pensions, via multiple pensions dashboards. For more information about the pensions dashboards ecosystem and its components, see <https://www.pensionsdashboardsprogramme.org.uk>.

The purpose of standards is to ensure the security, stability and effective operation of dashboards. They set out the technical and operational detail underpinning the primary and secondary legislation and outline the duties for all pension providers (which includes the trustees and managers of occupational pension schemes as well as the managers of stakeholder and personal pension schemes) and qualifying pensions dashboards services (QPDS) connecting to the ecosystem.

Standards are separate from, but designed to complement, the FCA's (Financial Conduct Authority) regulatory framework. As the FCA regulates the conduct of firms carrying out an activity, the FCA's Handbook rules will apply to QPDS firms and can impose standards on those firms (aligned to FCA's statutory objectives) when carrying out the qualifying pensions dashboard service. The FCA will consult on its proposed Handbook rules in due course.

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

### Purpose of the consultation

As the Department for Work and Pensions' (DWP's) intention is for the new legislative framework to come into place from April 2023 (subject to its staging proposals applying to pension providers), we want to give the pensions industry as much notice of our plans and our direction of travel for their duties.

We are seeking views from relevant stakeholders on the content and application of these consultation draft standards and guidance. We also invite comments on any areas where further clarification or detail is required.

## **Standards and guidance included within this consultation**

A detailed list of the questions we are asking across the range of consultation drafts is contained in Appendix A.

The standards and guidance that we are seeking views on in this consultation can be found on the PDP website and in Appendix B.

## **Call for Input: Design Standards**

At the same time as this consultation, we have also issued a 'call for input' on the design standards. Design standards will set out the requirements for the presentation of the pensions data on dashboards and design of the dashboards, including; messaging, signposting, onward customer journeys. We are asking for responses to our 'call for input' to be returned within the same time and manner as responses to the consultation.

## **Duration and timetable**

This consultation opened on **19 July 2022** and will run for six weeks until **30 August 2022**.

We will publish our response to this consultation on our website.

We aim to issue our final standards (apart from design standards) as close to the date the new legislative dashboard framework becomes law – our standards cannot come into force beforehand. In our consultation response, we will explain how we will be presenting the final documents and/or content.

## **Who is this consultation aimed at**

Although we welcome views from any interested parties, primarily this consultation is aimed at:

- pension providers,
- organisations interested in setting up QPDS, and
- organisations interested in supporting pension providers to comply with their duties:
  - pensions administrators,
  - pensions administration software providers, and
  - firms interested in offering Integrated Service Provider (ISP) services.

We are also keen to hear from:

- pensions and lifetime savings industries,
- finance and consumer representative groups with an interest in pensions engagement, financial wellbeing, data protection and security, and
- financial technology (Fintech) companies.

This consultation applies to England, Wales and Scotland and Northern Ireland.

## How to respond to this consultation

Please provide your consultation responses and email to [infopdp@maps.org.uk](mailto:infopdp@maps.org.uk).

When responding please indicate which standard, guidance or call for evidence you are responding to and whether you are responding as an individual or representing the views of an organisation.

## Consultation principles

This consultation is being conducted in line with the [Cabinet Office consultation principles](#).

## Confidentiality and data protection

The information you send us may need to be passed to colleagues within PDP/MaPS. It may be published in a summary of responses received and referred to in the published consultation response.

We also anticipate that we may share information with our key working partners: the FCA, the Pensions Regulator (TPR) and the DWP. All information contained in your response, including personal information, may be subject to publication or disclosure if requested under the Freedom of Information Act 2000.

By providing personal information for the purposes of the public consultation exercise, you consent to its disclosure and publication. If this is not the case, you should limit any personal information provided, or remove it completely.

If you want the information in your response to the consultation to be kept confidential, you should explain why as part of your response, although we cannot guarantee to do this.

### 3. About the standards and guidance

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#### **Standards and guidance included within the consultation**

It is important for there to be uniform mandatory requirements on all pensions dashboards ecosystem participants, to ensure the ecosystem functions effectively and efficiently, while putting the interests of consumers first. These are standards. Standards set out the technical and operational detail that underpins the primary and secondary legislation. They outline the mandatory requirements on QPDS and pension providers detailing how operationally, technically or in practice they must meet the duties set out in the regulations/rules.

Standards provide more flexibility than primary or secondary legislation, allowing for further iteration and development as the service matures: as this is a digital service, we need to be able to implement changes in service requirements in a simple and timely manner, without always amending legislation. How we will approach changing standards is outlined in the governance approach.

We are not only consulting on standards but other products. Two of those products are distinct types of guidance:

#### **Statutory guidance**

This only applies to pension providers. They must either follow this guidance or have good reason for departing from it. Where they depart from this guidance, the pension provider should be able to demonstrate that they have achieved the same result via their alternative path. The status of this comes from the DWP's secondary legislation.

#### **'Recommended' guidance**

Some guidance is recommended. Where possible, this guidance should be implemented where possible to enable optimal user outcomes.

In Appendix B we explain which products are guidance and when they have a different standing. In the final standards and guidance, we will explain how to differentiate between the standards and guidance when we are using different sets of guidance.

#### **How we have developed these standards**

This consultation is the result of intensive, and extensive, work with the DWP, the Government Digital Service, FCA and TPR as well our suppliers (Cap Gemini and Origo). We are especially grateful to the pensions industry's assistance and the time they have given up helping us develop the content and the policies as represented in these consultation draft standards. This includes the industry secondees lent to the PDP, the various PDP steering and working groups, the assistance of industry subject matter experts, the support and engagement of industry bodies as well as our alpha dashboard and data

providers (who are helping us test the CDA and our policies as we build them), webinar attendees as well as specific queries we have received directly and via stakeholders.

## Power to set the standards

The power to issue set standards and mandatory guidance is set out in Part IV of the Pensions Schemes Act 2021 (and the equivalent Northern Ireland legislation when it is put in place). This will be supplemented in the secondary legislation (applying to QPDS and occupational pensions schemes) and the FCA rules (which apply to personal pension schemes).

The DWP is responsible for putting in place the secondary legislation. Neither the DWP nor FCA has finalised these provisions. Both have issued consultations in respect of their proposals and the [DWP have published a response document](#) which confirms their policy. The secondary legislation is due to be published later this year.

Even though the power to issue standards and guidance currently (the longer-term governance has yet to be decided) rests with MaPS as the responsible entity, the standards and guidance have been developed by PDP on behalf of MaPS. Any references to PDP within individual standards and guidance documents should be read as such.

## DWP consultation response

This consultation is based on our understanding of the DWP's policy position as set out in their [consultation document response](#). The FCA's rules for personal pension schemes must take in account the DWP's secondary legislation (see (the to be brought into force) section 137FAA(8) Financial Services and Market Act 2000). To the extent there is any material changes between our understanding and the DWP's final secondary legislation or the FCA's final rules, we will consider whether to re-consult on these areas.

The DWP's secondary legislation will apply to Great Britain. We are working on the assumption similar secondary legislation will be put into place for Northern Ireland and the FCA's rules will apply to Northern Ireland. Therefore, the products which are subject to this consultation will be of application to the United Kingdom.

## Interaction with the FCA and HMT's consultations

Operating as a QPDS will be a FCA regulated activity. HM Treasury will be introducing legislation to make this clear. The FCA will also be introducing QPDS Conduct of Business Rules. This will be subject to a separate consultation.

### **Adherence to the standards**

Standards will be used to check QPDS and pension provider compliance with, amongst other things, their dashboard connection and reporting obligations.

Where appropriate, we will work with QPDS and pension providers to help reconcile any potential compliance issues. However, as adherence to the standards is an important requirement, and vital to the security, stability, and credibility of the pensions dashboards ecosystem, we will also put in place processes to escalate *all breaches* we identify to FCA/TPR.

Failure to adhere to our standards or have regard to our guidance can be used as evidence of breach of legal duties and may be used by the FCA or TPR in any regulatory action. Also, we reserve the right to disconnect any pension provider or QPDS from the ecosystem for breaching their dashboard duties, which for pension providers would mean they would not be able to meet these obligations.

## Appendix A: consultation questions

Standard, Guidance etc	Consultation questions
Code of connection	
Operational standards	Do any of the proposed requirements pose a specific problem for your organisation, if so, what?
Security standards	Are there any areas that you consider are missing from the code of connection?
Service standards	Do the proposed service levels seem reasonable for a digital service?
Connection guidance	<p>CoCo 2.1.3 requires view request responses within 2 seconds. This prioritises a fast response for the consumer. It may, however, create a barrier to calculating real time values for some providers. We would be particularly interested in views on this approach.</p> <p>Do the proposed steps for connecting to the dashboards ecosystem directly seem reasonable?</p> <p>Do the proposed steps for connecting to the dashboards ecosystem (via a third-party connection) seem reasonable?</p> <p>Does the proposed timeframe for completing these steps to connect seem reasonable?</p> <p>Is it clear what pension providers/their third-party ISPs (Integrated Service Providers) or dashboard providers will need to do to connect?</p> <p>Is there any additional guidance you need in relation to connection? And if so, what?</p>
Data	
Data standards	Are you confident that the proposed data standards adequately cover the benefit structure of all pension providers? Can it express the correct values to

Usage guidance	<p>all savers? If not, please share a brief description of the relevant benefit structure?</p> <p>Are the values allowed for the accrued (2.3xx) and ERI (Estimated Retirement Income) (2.4xx) warnings sufficient? Are there any other common reasons or scenarios you think these warnings should cover (bearing in mind we cannot support scheme-specific warnings).</p> <p>Would the ability to add a short piece of free text to cover pension provider-specific issues be workable for you, or introduce a new burden? If so, how many characters would be required and what topics would it cover?</p> <p>Without a new unique reference to link two pension elements together, the benefit values may get presented separately in a dashboard. Would the requirement for a scheme to create that new reference and share it with their other administrators be more onerous than dealing with any potential downside from not presenting the benefit values together onscreen?</p>
Design	
Design Standards: Call for Input	<p>Do you have any challenges (or support) in relation to our developing policy on design standards?</p> <p>Do you have any evidence to support your input?</p> <p>Have we omitted any issues in developing our policy on design standards?</p> <p>Do you agree with our approach to design standards principles and assumptions?</p> <p>In you or your organisation's experience (please provide evidence if you are able), are there any important principles or assumptions missing in our approach?</p> <p>Are we right to favour the user over the QPDS where there is any conflict between their needs?</p>
Reporting	
Reporting standards	Please provide comments on our overall breadth of information required.

	<p>Are there any technical barriers to you in supplying the reporting data?</p> <p>Are there any barriers to providing both the auditing and monitoring data feeds in mostly near real time?</p> <p>Management information and oversight data is to be provided daily. Do you have any alternative suggestions which would achieve our aims?</p> <p>The transport method for data is to push data to an API housed on the central data architecture API gateway. Do you perceive any risks with this approach?</p>
Technical	
Overview guidance	Do any of the proposed requirements pose a specific challenge for your organisation?
API (Application Programming Interface) Standards	<p>Are there any areas where further detail is needed?</p> <p>Do the proposed service levels seem deliverable for your organisation?</p>
Technical (other)	<p>Do the proposed timeframes seem reasonable?</p> <p>Is there any more guidance you need in relation to these requirements?</p>
Early connection	
Early connection guidance	<p>Do you consider the notification requirement to be reasonable?</p> <p>Do you consider the minimum requirement for at least a month's extension (for schemes with an existing date) to be reasonable?</p>
Governance	
Setting standards	<p>Do you have any comments on the change process and timeframes?</p> <p>Do you agree with our definitions of major and minor changes to the standards?</p>

Consultation Document	
	Are you clear on the differences between standards, statutory guidance and recommended practice?

## Appendix B: summary of all consultation standards and guidance

Standard or Guidance	Brief description and link to consultation	Applies to		Standard or guidance		
		QPDS	Pensions providers	Standard	Have regard to guidance	Recommended guidance
Code of connection						
Operational standards	Onboarding procedures, dispute management processes and service level failure protocols <a href="#">Code of connection</a>	✓	✓	✓		
Security standards	The minimum amount of assurance that the provider provided for connection purposes and security assessment procedures <a href="#">Code of connection</a>	✓	✓	✓		
Service standards	Cover matters service availability, connection state changes (such as scheduled downtime or maintenance), and notification requirements <a href="#">Code of connection</a>	✓	✓	✓		

Connection guidance	Details the process to be followed when connecting to the Ecosystem <a href="#">Connection process and guidance</a>	✓	✓		✓	✓
<b>Data</b>						
Data standards	Outlines the formatting of the data items to be provided dashboards <a href="#">Data standards</a>		✓	✓		
Data usage guide	Explanatory guidance to support the Data Standards <a href="#">Data usage guide</a>		✓			✓
<b>Design</b>						
Design standards: call for input	Detailing our current position on the requirement for the dashboard display of the view data as well as messaging, signposting, onward customer journeys. <a href="#">Design standards: call for input</a>	✓				
<b>Reporting</b>						
Reporting standards	Details reporting and auditing requirements	✓	✓	✓		

	Reporting standards					
<b>Technical</b>						
Overview guidance	Explanation of how the pensions ecosystem operates, including technical requirements <a href="#">Technical standards</a>	✓	✓			✓
API (Application Programming Interface) Standards	Explains the connection mechanism and the access management protocol used <a href="#">Technical documentation</a>	✓	✓	✓		
Technical (other)	Methodology for the generation of tokens, GUIDs (globally unique identifiers) and Pels (Pension Identifiers) <a href="#">Technical documentation</a>	✓	✓	✓		
<b>Early connection</b>						
Early connection guidance	When to apply for earlier connection to the pension ecosystem (including for pension providers with <100 relevant members)		✓		✓	

	<u>Early connection guidance</u>					
<b>Governance</b>						
Setting standards	Outline of how we will keep standards up-to-date and amend them (including timings and notification) <u>Approach to governance for standards</u>	n / a	n/a	n/a	n/a	n/a