

Design standards: consultation

1 December 2022

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Foreword by Chris Curry



Chris Curry

Principal, Pensions
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This consultation on our proposals for the qualifying pensions dashboard services (QPDS) design standards represents another major step forward for dashboards. The appropriate presentation of a user's pensions information on dashboards is vital for the success of dashboards. Design standards are key to consumer protection, and consumer protection is at the heart of making dashboards a success.

In July and August 2022, we held a call for input on design standards. There was a great range of responses, and the feedback we received has helped to inform the proposals for consultation. Following the consultation on standards held at the same time – the [November 2022 versions](#) of which we have published – your insights on these draft design standards will help to complete the duties of pension providers and schemes and the requirement for QPDS. We've worked with the Financial Conduct Authority (FCA) to develop a coherent and aligned approach, and we're publishing the draft design standards at the same as the [FCA's consultation on its proposed regulatory framework](#).

Parliament has now approved the [Pensions Dashboards Regulations 2022](#) which empower PDP to set standards for dashboards. We're currently working to connect the State Pension and the Money and Pensions Service MoneyHelper dashboard, ensuring a safe and stable connection process ahead of work with over 20 early participants. As we approach April 2023, when the first mandatory connection window opens for pension providers and schemes, it will be important that PDP is able to produce a robust and secure set of design standards.

The consultation will run until 16 February, and we will host a webinar on 8 December 2022 to talk through our proposals. One of our guiding principles is that we need to work together to harness the real potential of dashboards. I encourage you to share your feedback in this consultation.

Background

Introduction

1. Pensions dashboards are apps, websites or other digital tools which will bring together an individual's private pensions they have not taken (including public sector workplace pensions and those with an insurer) and their State Pension, all in one secure place online. This should support better planning for retirement and financial wellbeing.
2. The Money and Pensions Service (MaPS) established the PDP in 2019 to be responsible for designing and creating the pensions dashboards ecosystem, which contains the central digital architecture (CDA) that will make dashboards work. This involves building and maintaining the CDA and the ecosystem governance framework. They both support and enable the implementation and the operation of multiple pensions dashboards. This will make dashboards possible, connecting millions of individuals to their information across thousands of pensions, via multiple pensions dashboards. For more information about the pensions dashboards ecosystem and its components, see <https://www.pensionsdashboardsprogramme.org.uk>.
3. 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 and schemes (which includes the trustees and managers of occupational pension schemes as well as the managers of stakeholder and personal pension schemes as well insurers) and QPDS, who are connected to the pensions dashboards ecosystem.

Design standards

4. The Pensions Dashboards Regulations 2022 give MaPS the responsibility to set design standards that all QPDS must comply with when presenting pensions information to the user¹. The regulations set out the scope of these standards: 'the way in which information is to be presented to users of pensions dashboard services'².
5. The extent of the pensions information to be displayed on dashboards is detailed in the secondary legislation. It includes: administrative data, signpost data, value data and contextual data provided by pension providers and schemes, as well as the State Pension data³.
6. Although the MaPS dashboard is not required to follow the design standards as it is not a QPDS, it will be adopting the framework set out in the design standards as far as it can.
7. QPDS are not the only parties affected by these design standards. Design standards will be important to the user, but they are also relevant to pension providers and schemes. It is the pension providers and schemes who have the legal obligation for putting together the pensions information

¹ See regulation 9(2) of the regulations.

² See Schedule 1 to the regulations.

³ See Chapter 2, Part 3 of the regulations.

and who have the responsibility for sending it to a QPDS. They will want to understand how this information they send is presented to the user.

8. Our design standards apply to England, Scotland, Wales and Northern Ireland⁴.
9. We are seeking views from relevant stakeholders on our proposed design standards. We also invite comments on any areas where further clarification or detail is required. The consultation draft for our design standards is set out in **appendix A**.

FCA regulatory framework

10. Our standards are separate from, but designed to complement, the FCA's regulatory framework for firms providing pensions dashboards. The FCA's regulatory framework includes Handbook rules for firms operating a pensions dashboard service (those rules will align to the FCA's statutory objectives). These rules cover:
 - a. how firms become (and remain) authorised to undertake the regulated dashboard service activity;
 - b. how firms are to undertake this regulated activity; and
 - c. rules on ancillary services connected to this activity.
11. The FCA is currently consulting on its proposed regulatory framework⁵. As detailed in the foreword to this paper, both the PDP and FCA recognise how the FCA's regulatory framework and the design standards need to be aligned. Therefore, we encourage respondents to read both the FCA's and our consultations before responding to either consultation.

Our approach to design standards

12. Pensions are the most important part of most users' retirement savings, and we want dashboards to play an important part in helping users to understand their pensions, to engage in their retirement planning, obtain advice or guidance and ultimately make informed decisions. Dashboard users will see information about their pensions all in one place online for the first time. We want dashboards to have immediate credibility with users. This means users having a good user experience whilst being adequately protected. This means dashboards should be engaging, accessible and inclusive whilst presenting pensions information in a clear and comprehensible manner.
13. It is important to put in place consumer protections (for example, to inform better decision-making or prevent scams). A key part of our consumer protection initiative has been to investigate how the user best understands the limitations of the pensions information being displayed on dashboards.
14. Our approach has also been developed to take account of the FCA's proposed regulatory framework and the DWP's policy. The latter includes the DWP's user comprehension and protection design

⁴ The regulations apply to Great Britain and corresponding legislation will apply to Northern Ireland; and the FCA's rules apply to the UK.

⁵ <https://www.fca.org.uk/publications/consultation-papers/cp22-25-proposed-regulatory-framework-pensions-dashboard-service-firms>

principles (especially its first principle on providing ‘clear information’) from when the DWP launched the dashboard project⁶:

- a. put the consumer at the heart of the process by giving people access to clear information online.
 - b. ensure the consumer’s data is secure, accurate and simple to understand — minimising the risks to the consumer and the potential for confusion.
 - c. ensure that the consumer is always in control over who has access to their data.
15. As we explained, and was detailed in our CFI, we have been informed by various sources when developing our design standards:
- a. we have used industry engagement (from our usability working and steering groups as well as our early participant dashboard providers) to gather their insights into what the user wants to see and their experiences when presenting pensions information to users.
 - b. to build our CDA (including the consent and authorisation service user interface) we have undertaken extensive user research. Through this research, we have learnt a lot about how users may interact with dashboards. This research has provided us with insights into a user’s needs, their understandings and their reactions to the information displayed on a dashboard.
 - c. we have also supplemented this research with qualitative research as well as with learnings from both the international dashboard experience and the UK’s pensions industry research.
16. This has all informed our initial proposals and ideas which we surfaced in our July design standards CFI. The CFI ran for six weeks and ran concurrently with the main standards consultation exercise. We received a great response: 56 responses to both consultations and 34 of those included responses in respect of the CFI (**see appendix B** for the list of respondents to the CFI). In **appendix C** we summarise our analysis of the responses to the questions asked in the CFI and explain how they influenced the consultation proposals.
17. Learnings and insights into design issues will only increase over time and as more QPDS connect to the pensions dashboards ecosystem. We will also develop a greater knowledge of user experience as we test and undertake more user research. In **appendix C**, we also outline how we expect design standards to evolve over time in the light of these learnings and insights.

About this consultation

18. **How long does it last?** This consultation opened on **1 December 2022** and will run for **11 weeks** until **16 February 2023**.
19. **Who should respond?** We welcome views from any interested parties. Primarily this consultation is aimed at:
- organisations interested in operating a QPDS

⁶ Paragraph 103 of the DWP’s Pensions Dashboards: Government Response to the Consultation (April 2019).

- finance and consumer representative groups with an interest in pensions engagement, financial wellbeing, data protection and security
- financial and technology (fintech) companies

We are also keen to hear from:

- pensions providers and schemes
- the pensions and lifetime savings industries
- individuals from minority groups, under-represented or disadvantaged groups (including groups who represent them)

20. **How do I respond?** Submit your consultation responses by **16 February 2023** [via our online survey](#).

When responding please indicate if you are responding as an individual and/or representing the views of an organisation.

21. **How will you use my consultation response?** The information you send to 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 may also share information with our key working partners: the FCA, the Pensions Regulator (TPR) and the DWP. Also, 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.

22. **Is my response confidential?** 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.

23. **Is there anything else I should know?** This consultation is being conducted in line with the [Cabinet Office consultation principles](#).

Consultation questions:

24. We have the following questions in relation to our design standards:

- our aim is for QPDS to be engaging, inclusive and accessible. Do our proposals achieve this aim? If they do not, what more do you think we could do?
- we have tried in our design standards to strike the right balance between ensuring consumer protection while also allowing dashboards the flexibility to tailor their communications and designs to their own audiences. Do you agree our approach strikes the right balance? Do you have suggestions about what more we could do to strike the right balance?
- we have not replicated the terms from the regulations or the FCA's regulatory framework in the design standards, as we do not consider we need to duplicate these and also given that QPDS must familiarise themselves with those terms in any event. Do you agree with our

approach that design standards should be read consistently with the regulations and the FCA's regulatory framework (see paragraph 16 of the draft standards).

- d. we consider it is important that QPDS are accessible and propose they are at least AA compliant with the industry standard: W3C Web Content Accessibility Guidelines 2.1 (or another equivalent) (see paragraph 25(b)(i) of the draft standards). Do you agree with this approach to ensuring accessibility? If you do not agree with this suggestion, then what other approach do you think we should adopt to ensure dashboards are accessible?
- e. we have explained what we mean by dashboards being inclusive (see paragraph 25(b)(ii) of the draft standards). Do you think we need to provide more explanation?
- f. we have not defined the terminology to be used by QPDS when presenting pensions information (see paragraph 25(c) of the draft standards), as we believe dashboards will be best placed to determine the most appropriate way of communicating to their customer base, and imposing uniform requirements on language could be counter-productive. Do you think this is right the right approach? If you do not agree with our approach, then how do suggest we should approach defining terminology?
- g. in a number of places, we have referred to the QPDS presentation of information in a 'neutral and logical manner'? Are you clear what this means in the light of the explanation in paragraph 39 of the draft design standards? How do you think we could clearer in explaining what we mean?
- h. in relation to the summary of pensions information on the QPDS:
 - i. do you agree with the approach of a summary of all of the pensions information provided the user can click through to the detailed pensions information in respect of each benefit? If you disagree, please explain what approach you would prefer.
 - ii. do you consider we are requiring the right amount of information to be displayed in the pensions summary? If you do not agree with our proposals, what information do you think we are missing or what information do you consider to be superfluous?
 - iii. do you agree with the rules are proposing for how the summary is constructed? If you do not agree, then can you explain why not and highlight any omissions you consider we have made.
- i. do you think we should allow graphical representations of all the found pensions on QPDS (see paragraph 46 of the draft standards)? If you do not agree, could you explain why?
- j. do you think the mandated explanation mitigations we have put in place for graphical representations are adequate? Please explain what you would consider to be adequate mitigations.
- k. are we right to require QPDS to have prominent links to the CDA displayed on each page (see paragraph 45a) of the draft standards)?
- l. we have not required QPDS to communicate information around delegated access (to a MaPS guider or, in specific circumstances to a Financial Adviser) as this takes places at the consent and authorisation service. Do you think we should require QPDS to explain the

possibility of delegated access earlier, even if the QPDS is not providing a delegated access functionality (which would be in respect of the Financial Adviser only)?

Please also feel free to submit any other comments you wish to make in respect of our proposed design standards.

Timetable

25. We aim to issue our design standards at the same time as the FCA finalises its regulatory framework for QPDS. Our current assumption is this will be, in or around, summer 2023. We will publish a consultation response at the same time.

Analysis: CFI responses and the FCA's consultation

CFI responses

19. In July, we published our call for input (CFI) as we wanted to surface our developing ideas for design standards and to get feedback. We have used the CFI responses to help us refine our current proposals.
20. In the CFI we asked a number of questions. In **appendix C**, we outline the responses received, including where these supported our position or influenced us to take a different approach.
21. We also shared a summary of the responses received with the FCA.

FCA consultation

22. In developing both the CFI and this consultation, we worked closely with the FCA. We consider that our proposals complement those in the FCA's consultation on the regulatory framework for pensions dashboards.
23. A number of the respondents highlighted that they could not fully respond to our CFI without sight of the FCA's QPDS proposals. Whilst recognising this we considered it was best to begin the dialogue with the industry on our proposals as soon as possible, and we are pleased to now be consulting on design standards in parallel to the FCA's consultation on their regulatory framework.
24. There were number of areas raised by CFI respondents which respondents correctly speculated were for the FCA. These included: data export, the user's onwards journey as well as marketing/advertising. These areas are covered in the FCA's consultation.
25. We always knew there would be the potential for crossover between the FCA and PDP's policy areas. A key issue for us was to make sure there were no important gaps. On the other hand, we wanted to avoid duplication and the possibility of regulatory arbitrage. In light of the feedback and our discussions with the FCA, there are a number of key areas (initially covered in our CFI) which now fit better within the FCA's framework and are, therefore, now covered exclusively in the FCA's consultation. These are:
 - a. the content of the view data warnings;
 - b. the explanation of the limitations of the dashboard service; and
 - c. the user's onward journey.

Amended approach

26. In the CFI, we detailed the aims and principles which have guided us when developing these design standards. We referred to this as our approach. Following the CFI, and as part of putting together this consultation, we have refined the approach. In **appendix C**, we have explained how our approach has evolved. This evolved approach is included in the draft standards.

Appendix A: design standards: consultation draft

Introduction

1. This standard applies to a firm providing a qualifying pensions dashboard service (QPDS) and its presentation of pensions information to dashboard users (users)⁷.
2. Pensions information is the totality of information that a pension provider or scheme (occupational stakeholder and personal pension schemes and insurers) as well as the State Pension sends to the QPDS and which the QPDS must display to the user (under the regulations⁸, the Financial Conduct Authority's rules for pensions providers⁹ and our data standards¹⁰).

Background

3. Pensions dashboards are apps, websites or other digital tools which will help individuals view their pensions information online. They will bring together an individual's pensions they have not yet taken, including their State Pension as well as any with a pension provider or scheme, supporting better planning for retirement and growing financial wellbeing.
4. This standard is issued by the Money and Pensions Service (MaPS). MaPS set up the Pensions Dashboards Programme (PDP) in 2019 to design and create the pensions dashboards ecosystem and the supporting governance framework.
5. The pensions dashboards ecosystem contains the central digital architecture (CDA) that will make pensions dashboards work. It will connect 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/ecosystem/>.
6. MaPS is also responsible for operating its own dashboard.
7. Standards are separate from, but designed to complement, the FCA's regulatory framework for pensions dashboard service firms. Firms which operate a QPDS will need to be (or become) FCA authorised, get the regulatory permission to undertake this new regulated activity and meet any Handbook rules and guidance that the FCA may introduce for firms undertaking this activity.

Audience and jurisdiction

8. This standard applies to all QPDS regardless of whether the dashboard is an app or a website and regardless of the type of digital device used (for example a desktop, tablet or smart phone).
9. It applies to all QPDS subject to the dashboard duties in the regulations and the FCA's regulatory framework.

⁷ Under regulation 9 of the Pensions Dashboard Regulations 2022 (the regulations).

⁸ Pensions Dashboard Regulations 2022.

⁹ <https://www.fca.org.uk/publications/policy-statements/ps22-12-pensions-dashboards-rules-pension-providers>

¹⁰ Link will be included to the approved data standards. Current published detail can be found here: [Updated dashboards standards released following consultation | Pensions Dashboards Programme](#).

10. This standard does not apply to a dashboard's display where the user is a financial adviser to whom the user has delegated access¹¹. The financial adviser is in a different position to the user as they should be experienced in interpreting pensions information. The user's detailed pensions information must still be available to the financial adviser on the dashboard.

Other guidance

11. This standard must be read in conjunction with the PDP's other standards and, in particular, the PDP's data standards.
12. It must also be read and implemented alongside the FCA's Handbook rules and the DWP's State Pension design standards¹².

Use/evidence

13. Standards are mandatory requirements and, therefore, a QPDS compliance with this standard is compulsory.
14. Standards and guidance may be admitted in any proceedings relevant to a pension provider, a scheme or a QPDS' compliance with their dashboard duties – this also applies to the obligations owed by any other party (for example, a pension provider or scheme's sponsor employer or administrator). It will be the decision of the body hearing the proceedings (including any regulatory proceedings conducted by the FCA or The Pensions Regulator (TPR)) to assess the evidential weight to be attached to the standard or guidance.

Version

15. This is December 2022 version of our design standards.

Terminology

16. Terms used in this standard are to be read consistently with the terms in the regulations and the FCA's regulatory framework as well as our data standards.
17. The term 'tranches' is taken from the regulations. It is used for a defined benefit pension scheme that has elected to make several returns to illustrate that different amounts of a benefit are payable from different dates, different periods of or at different rates¹³.
18. The 'McCloud-like remedies' term is used in respect of a public service scheme illustrating two alternative pensions (which are all set out in the regulations)¹⁴.
19. These terms are used interchangeably: pensions with benefit; and QPDS with dashboard.

¹¹ Under regulation 8(4)(b) of the regulations.

¹² See regulation 10 of the regulations.

¹³ See paragraph 2(4) of Schedule 3 to the regulations.

¹⁴ Under paragraph 2 of Schedule 3 to the regulations.

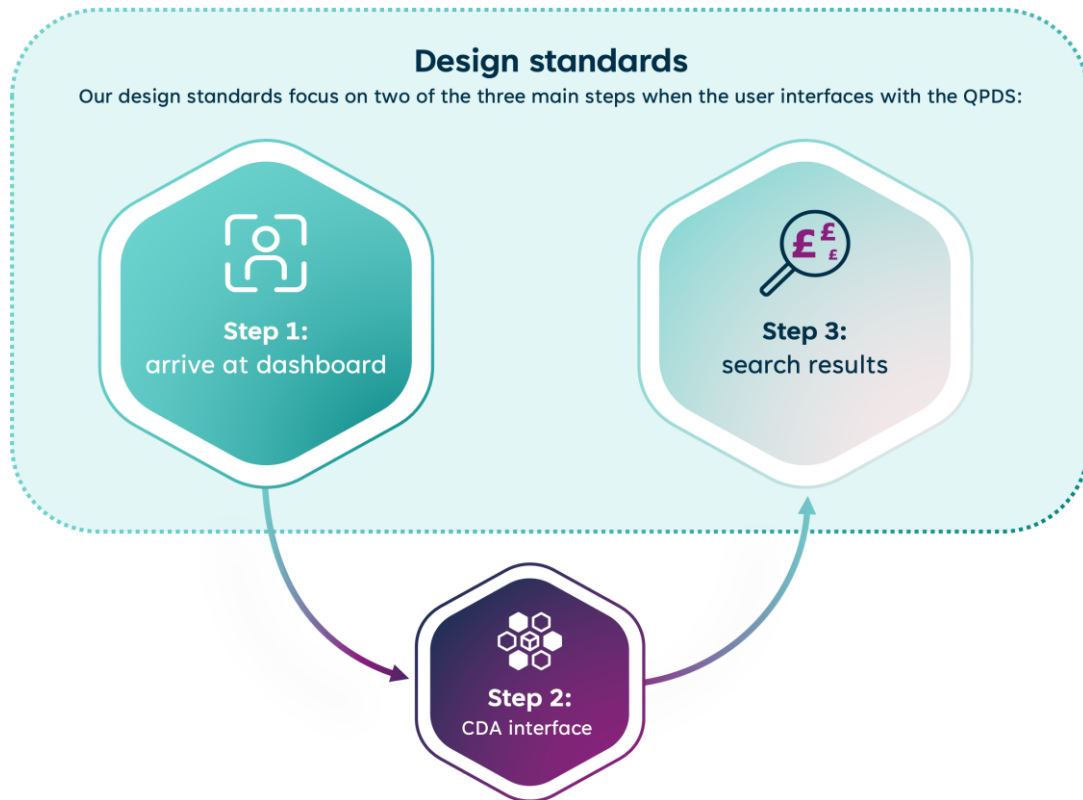
Our approach

20. Pensions are the most important part of most users' retirement savings, and QPDS play an important part in helping users to understand their pensions, engage in their retirement planning, obtain advice or guidance and ultimately make informed decisions. Dashboards provide their user with the opportunity to see their pensions information all in one place online for the first time. Due to their importance, dashboards should have immediate and ongoing credibility with users. This means QPDS must ensure that their displays of pensions information are engaging, accessible and inclusive whilst presenting pensions information in a clear and comprehensible manner.
21. These design standards set out a framework for how a QPDS must structure the display of pensions information to the user and the requirements relating to this display to achieve these aims. It also covers other display requirements. Below we have set out our approach when putting together this framework and summarised some of the key requirements for dashboards when implementing the framework:



The user's journey

22. The structure of this standard is built around the user's dashboard journey. The core user journey is illustrated below:



23. Not every step along the user's core journey will be at the QPDS. Step 2 takes place when the user is at the PDP's consent and authorisation service. These design standards only relate to QPDS; and, therefore, cover two of the three separate steps (1 and 3) when the user interacts with the QPDS.

24. Within each step and the other display requirements there are several activities. These are covered by these design standards and summarised below:

Step 1: Arriving at the dashboard	Step 3: Search results
<ol style="list-style-type: none"> 1. Explaining the dashboard service 2. Handover to the CDA (for a pension find or authentication) 	<ol style="list-style-type: none"> 1. Display of view results: summary 2. Display of detailed pensions information 3. Updated pensions information

4. Links to: the CDA, service explanations, PDP's central user support service
5. Graphical representations

Communication

25. When a QPDS is implementing the requirements set out in these design standards it must comply with the following:

- a. QPDS functionality or communication must be consistent with our framework as well as the regulations and the FCA's regulatory framework. Within the ambit of the design standards there is scope to tailor the dashboard offering and communication to reflect the QPDS client-base. For example, when communicating with users, a QPDS could use text or a video.
- b. dashboards must be engaging, accessible and inclusive. Dashboards are an opportunity to promote pensions understanding amongst the population as a whole and this can only happen if all users can be engaged. Users can only be engaged if they can use dashboards or feel comfortable in using them as well as comprehend the information being displayed. To this extent QPDS must be:
 - i. **accessible by design:** to achieve this a QPDS must be at least AA compliant with the industry standard: W3C Web Content Accessibility Guidelines 2.1 (or another equivalent).
 - ii. **inclusive by design:** to achieve this they must always be designed for use by those with additional or out-of-the-ordinary experiences and needs, and particularly with protected characteristics in mind (for example, we recommend avoiding the use of gendered language). Also where a dashboard's users could include customers in vulnerable circumstances with, for example, little pensions or financial services knowledge, the dashboard should be designed with these users in mind.
- c. when displaying pensions information the QPDS must always present it alongside a term to enable the user to immediately understand what the information relates to. We refer to this term as a label. The label is not a complete explanation of what the pensions information means. For this reason, the QPDS must always offer a detailed explanation of what a label for a pensions term means (including, any material assumptions or information) to the user (for example, an 'information' button or a collapsible box). It will be a decision for the user whether they access this more detailed explanation. When developing these labels and further explanations, the QPDS must consider the terminology and explanations set out in the Regulations, the FCA's regulatory framework and our data standards. For example:
 - i. a defined benefit accrued pensions value could be labelled 'DB accrued pension'; however, this will not usually be the value the user will be entitled to at the moment. It is an expression of what the value could be to the user, for example, were they

able to retire at the calculation date, take their pension in a certain manner and with no reductions applied. It is these concepts that must be conveyed in the detailed explanation.

- ii. defined contribution values are calculated using a standardised prescribed methodology which assumes the user will not take a tax-free lump sum and will use their pension pot to purchase a single-life annuity which does not include any inflationary increases¹⁵. It is this level of detail which must be included in any detailed explanation.
- d. QPDS must display the pensions information and are not permitted to amend it (including undertake calculations in respect of values) and present the modified pensions information on the dashboard. This does not restrict a QPDS from enhancing the display of the pensions information to better illustrate its presentation. For example:
- i. for pensions values returned showing an annual income, the QPDS may elect to present the income as a monthly amount¹⁶,
 - ii. instead of a benefit's payable date, the QPDS might frame it as 'payable in x years' time', or
 - iii. when referring to when a value should be available, the QPDS may inform the user it should be available by, say, 'Friday' or '10 October' (where, for example, the QPDS is aware the pension provider or scheme is a defined contribution occupational pension scheme who must return the value data within no more than 3 days).
26. The design standards set out a framework. When QPDS are developing their own offering in the light of this framework and these requirements, they must undertake user research in respect of their proposals to ensure it delivers an effective and comprehensible means of communicating to the user and meets the requirements of our framework. QPDS should keep records of this research for at least three years.

¹⁵ [Actuaries | Actuarial Policy | Actuarial Standards | Actuarial Standard Technical Memorandum: AS TM1 Current Versions | Financial Reporting Council \(frc.org.uk\)](#)

¹⁶ Except for the initial summary of pension information.

Step 1: arriving at the dashboard

27. When a user arrives at the dashboard, the QPDS must explain what the purpose of dashboards is:

- a. this is to find and show to the user the pensions information in respect of any State Pension and UK workplace pensions, stakeholder and personal pensions,
- b. but only in respect of relevant members (defined as active, deferred and pension credit members)¹⁷ and for State Pension, those who have not yet reached their State Pension age.



28. QPDS must explain it will not store the pension information it receives from the pension provider or scheme on the dashboard once the user's session has finished.

29. Before handing a user off to the CDA to undertake a new pensions find search, the QPDS must:

- a. explain the CDA is a separate service run by MaPS.
- b. include the following explanation of who MaPS is and what it does:

“The Money and Pensions Service (MaPS) is an arm's-length body sponsored by the Department for Work and Pensions, established at the beginning of 2019, and also engages with HM Treasury on policy matters relating to financial capability and debt advice.

MaPS helps people – particularly those most in need – to improve their financial wellbeing and build a better, more confident future. Working collaboratively across the UK, MaPS makes sure customers can access high-quality money and pensions guidance and debt advice throughout their lives, how and when they need it.”

- c. communicate what will happen as part of the CDA find process:
 - i. **verifying the user's ID through the identity service:** it is important that the user knows that they will need to verify their identity and they will need to interact with another service to do so. This prompt is also important so the user can prepare (for example, by putting together important information) to complete verification¹⁸.
 - ii. **overall:** after the CDA has verified the user's identity, the user will be asked to supplement the verified information with some additional information. All this information will be sent to pension providers and schemes to help them see whether they have a pension for the user. If a pension provider/scheme finds a pension that matches their details, the QPDS will have access to a notification (sent to the CDA) that enables the user, via the QPDS, to retrieve their pension information.

¹⁷ See Schedule 1 to the regulations.

¹⁸ which the PDP will detail when the identity service has been finalised.

Step 3: search results

30. After the user is returned to the dashboard from the CDA, following a new search or for a subsequent view request against found pensions (without going through the find process again), there are two sequential stages for the presentation of pensions information on a dashboard:

- a. **summary of pensions information** – this is the summary of pensions information the user has requested for each matched pension.
- b. **providing more detailed pensions information** – this is how QPDS are required to display the detailed pensions information.



Summary of pensions information

31. The purpose of the summary is to display to the user all the key pensions information for all the pensions found and possible matches all within the same webpage/display. A page break, pagination or scrollable page is permitted where the number of pension information returns cannot be reasonably displayed all in one screen display. This is permitted provided there is clear communication at the top of the summary about how many pensions have been found and a clear communication of how to access the summary not shown on the initial screen.
32. The summary is also the gateway for the user to access the detailed pensions information in respect of each pension found.
33. The summary should have an entry in respect of each benefit. This includes where the user has a number of benefits under the same pension provider or scheme (for example, a user with a deferred defined benefit and an active defined contribution benefit under the same scheme must see two entries on the summary).

In the following table, we have broken down what information the QPDS must display in the summary in respect of each circumstance for a benefit return:

Type	Pension provider or scheme	Estimated retirement income (ERI) value*	Date payable**	Reasons for not displaying pensions value in summary	Indication of when pensions value should be /should have been available	User action recommended* **	Link to detailed pension information****
a) possible match	✓					✓	✓
b) value available c) value available but subject to a McCloud-like remedy d) value available but the pension is subject to tranches	✓	✓	✓				✓
e) value not currently available – being calculated f) value not currently available – new member	✓			✓	✓		✓
g) value data not available – exemption (for example, the value of the users DC pot is below £5,000, scheme wind up, or subject to the PPF)	✓			✓		✓	✓
h) match only – no further information provided (for example, the time to calculate the benefit has expired or the pension provider/scheme’s system is offline)	✓			✓	✓	✓	

*Annualised estimated retirement income value. For (c) the QPDS must show one of the two ERIs returned and indicate there is another alternative ERI. For (d), the QPDS must show the total ERI payable from the beginning of the last tranche. For both, the summary should indicate there is more important information about how the ERI could be paid in the detailed pensions information page.

** The payable date the pension provider/scheme has selected.

***For (a), (g) and (h), the QPDS must explain what the further action required is and why (ie contact the pension provider or scheme) in the detailed pensions information page. In the summary, it is enough to have a link which indicates that the user has to, for example, 'click' on it to find out what action is required and why.

****For (a), the link to further information will be to the pension provider/scheme contact information.

34. The QPDS must follow these rules for the presentation of the summary:
- display the pensions information contained in the summary in a list or tabular form.
 - have an entry in respect of every view request the QPDS has issued.
 - the State Pension (if available) must always be displayed first in the summary.
 - pensions value data must be displayed in an annual format.
35. A QPDS must group these found pensions together:
- all possible matches.
 - pensions in the same pension scheme (but not pension provider).
 - pensions where there is a pensions link¹⁹.
 - pensions with the same employer.
 - other found pensions not covered in sub-paragraphs (a) to (d).
36. Subject to the groupings in paragraph 35, QPDS must display found pensions and groups (or possible matches) selecting from the following display order methodologies for their primary, secondary etc display methodologies:
- in alphabetical order in respect of pension provider/scheme,
 - chronological order of payable date or when pensionable service began (ascending or descending), or
 - ERI value (from largest to smallest or vice versa).
37. Under the DWP's State Pension design standards, the QPDS must display key messages depending on a range of scenarios. The QPDS need only display the State Pension forecast on the summary. The prescribed messages must not be displayed on summary but in the detailed pension information.
38. During the user's session, further pensions information from a pension provider or scheme could be sent to the QPDS after the initial display of the summary. Where this happens, the QPDS must inform the user of the receipt of this further information and offer to take the user back to an updated initial summary. When displaying the updated summary, the QPDS must indicate where there have been new entries.
39. Once the summary list has been displayed to the user, or updated as described in paragraph 38, the QPDS may allow a user to select a different order in which to the summary is presented or, for example, to show monthly amounts. In any event, the QPDS must only offer logical and neutral

¹⁹ Link will be included to the approved data standards. Current published detail can be found here: [Updated dashboards standards released following consultation | Pensions Dashboards Programme.](#)

display options to avoid conveying a perceived hierarchy or suggesting one pension is better or more appropriate than the other.

Providing detailed pensions information

40. When the user navigates from the summary to the detailed pensions information, the QPDS must allow the user to see all their pensions information returned by the pension provider, scheme or State Pension in relation to just that pension in a single space. The only exceptions are:
 - a. for those pensions where there is a pensions link²⁰ when all the pensions information in respect of the linked pensions must be shown together in a single space.
 - b. for possible matches, all the pension provider/scheme contact information must be contained in a single space regardless of which summary entry the user has clicked through from. (On this page, QPDS must be careful to explain that user's should contact the scheme within the 30 days' time limit, otherwise the pension provider or scheme must delete the record of a possible match. However, QPDS must be careful to explain to the user that this will not mean any pension held will be forfeited in the absence of a user contacting the pension provider or scheme).
41. The space may be in one webpage/display or, for example, by using a cascade, scrollable functionality where the user can select to unlock further information from a single webpage/display. Where this functionality is used, then the QPDS must communicate to the user there is more information available.
42. The detailed pensions information must always be presented in a neutral and logical manner, even when the QPDS offers the users options for the order in which in this information is displayed²¹.
43. Each of the scenarios detailed in the table in paragraph 33 (with the exception of b) will require the detailed pension information page to provide an explanation of the relevant circumstances and, where action is required, what the action is.
44. As part of the detailed pension information, the QPDS may graphically represent a pension's value data (for example, using a time and money graph). This may be a better way to illustrate tranches and McCloud-like remedies.

Other display requirements

45. On every QPDS webpage/display page, the QPDS must contain:
 - a. A prominent link(s) to the CDA so the user may:
 - i. undertake a new pensions find search,
 - ii. change their delegations, or
 - iii. amend the dashboards they have authorised to display their pensions information.
 - b. A link back to the explanation of what a dashboard service is and how it works²² (for example, a link back to the 'About this service' page/tab).

²⁰ Link will be included to the approved data standards. Current published detail can be found here: [Updated dashboards standards released following consultation | Pensions Dashboards Programme.](#)

²¹ For the same reasons as given in paragraph 39.

²² The information as detailed in paragraph 29.

- c. A link to the PDP's central user support service²³. This is a function provided by the PDP that all QPDS must offer. The aim of the service is to help direct users to the right party when the user has a pensions issue as a result of using a dashboard (for example, if the user's issue is with the information displayed on, or missing from, a dashboard, then the service may well direct the user to the pension provider or scheme in the first place).

Other display options: totalling and graphical representation

46. If the QPDS provides pensions totalling or graphical representations of the data, then the QPDS must explain the differences between the types of pensions (when there is more than one) used before the representation can be displayed. This would include explaining the material differences:
 - a. in risks and uncertainty between each pension type (for example, the differences between a defined benefit pension and defined contribution pension),
 - b. in the methodologies and assumptions (used to calculate the pension value data) between each pension type; and
 - c. that some of the pensions displayed may be subject to inflationary increases that are not reflected in the totalling or graphical representation.
47. There must be a link from any additional QPDS functionality back to the summary.
48. Where this (or other) functionality is used (including when the QPDS offers the users options for how pensions information is displayed), the QPDS must ensure the pensions information is presented in a neutral and logical manner²⁴.

²³ As required under regulation 12 of the regulations.

²⁴ For the same reasons as given in paragraph 39.

Appendix B: consultation respondents

ABI
Aegon
AJ Bell
Altus
Aon
Armed Forces Pension Scheme
B&CE
Bravura Solutions
Capita
Curtis Banks
Dominic Lindley
Equiniti
Financial Data and Technology Association
Hargreaves Lansdown
Heywood Pension Technologies
HS Pensions
Legal & General
LGA- Local Government Pension Committee
Mercer
Moneyhub
NEST
PASA- Pensions Administration Standards Association
Phoenix
PLSA- Pensions & Lifetime Savings Association
Quietroom
RNIB
Royal London
Scottish Widows
The Society of Pension Professionals
TISA- The investing and saving alliance
Wesleyan
West Yorkshire pension fund
Which
Willis Towers Watson

Appendix C: Our analysis of CFI responses

1. **We have structured our analysis of CFI responses around the questions we asked in the CFI.** There was quite a bit of feedback, and hopefully respondents can see how we have taken on board a lot of their comments. In the consultation draft we have added a lot more detail, which was deliberately excluded from the CFI. There were a number of comments in respect of sequence and structure which we have taken on board (for example, we have removed the ‘waiting’ and ‘found pensions’ stages as they cluttered the user experience). We also took on board a number of suggestions about how to improve presentation.
2. **Do you have any input in relation to our developing policy on design standards? Have we omitted any issues in developing our policies on design standards?** We have combined our analysis in respect of both of these questions as there was quite a bit of crossover when respondents answered these questions:
 - a. Our design standards are neutral on whether the user is accessing the dashboard through an app or a website and whether the device is a desktop, smartphone or tablet. We have made this clear in the proposed design standards and acknowledge that in the event presentation of the detailed pensions information is an issue, then the QPDS may use another webpage or part of the app provided the QPDS makes the user aware of how many pensions have been found (a requirement for the summary page). Also, a cascade, scrollable approach is permissible for displaying the detailed pensions information provided the user is aware there is more information to explore. This all may be appropriate for QPDS displays on smaller screens.
 - b. Most respondents favoured our approach to allow QPDS room to tailor their offering to their client base. They opined that too much prescription would stifle innovation and undermine their ability to provide a dashboard universe of diverse offerings. This, they claimed, would frustrate competition, which was highlighted as one of the crucial benefits of allowing the private sector to offer provide dashboards. Therefore, we have kept our approach which allows the QPDS room to develop their own offering. We have also clarified this also extends to allowing room for bespoke functionality and innovation provided the QPDS meets our framework and requirements. However, as the shape and content of their dashboard rests with the QPDS, we have underscored the importance of the QPDS comprehensively user-testing their service and how this user-testing is compulsory.
 - c. We have retained the discretion to be directive in certain areas. This has been deployed where we think it is required to ensure there is a broadly consistent, well protected approach for the user. In particular, we have applied this approach to establish the framework that each QPDS must apply and for the presentation of the all-important summary of pensions information.
 - d. We also listened to those respondents who were worried that without some form of direction in the pensions summary, then this could lead to misleading presentations. Respondents were concerned it would be possible for QPDS to present the summary to suggest a perceived hierarchy. A hierarchy could suggest to users better pension providers/schemes. We agree with this risk. To address it, we have been clearer in our rules in respect of how a QPDS must construct the pensions summary. In doing so, we have also listened to respondent suggestions how we should prune back the summary to provide only the essential pension information and avoid information overload for the user.
 - e. Respondents feared when we published a final set of design standards that these standards would never evolve. This was never our intention and we are glad to clarify our position to avoid misunderstanding. Our design standards will evolve as we learn more about how users consume

and process pensions information (especially before the Dashboard Availability Point) as well as how QPDS implement these standards. Not only will we update our design standards but we will consider to what extent we need to publish design standards guidance. We have also updated our approach to standards document²⁵ which explains how we will go about maintaining and updating standards.

- f. Respondents pointed out that although pensions providers might not be able to provide some of the user's pension information straight away, the QPDS could let the user know how long this might take and if any additional steps are needed. This was a suggestion we have taken in board for the summary of pensions information.
 - g. Respondents also queried what we meant by display logic and what kinds of and, as requested, we have explained what we mean by this whilst removing the label – as it was pointed out by respondents there was a range of understanding as to what the term could mean.
 - h. Accessibility and inclusivity were always to be important requirements for dashboards. Accessibility was a CFI principle and now we have added inclusivity too. We have also now added the detail about how QPDS can meet the accessibility requirement. It is through the being at least AA compliant with the industry W3C Web Content Accessibility Guidelines 2.1 (or another equivalent) standard. This standard has been endorsed by HMG as reasonable way to test accessibility: [Make your website or app accessible and publish an accessibility statement - GOV.UK \(www.gov.uk\)](#). We are aware this guideline is being updated and will update the reference to the next version in due course, provided it remains appropriate. In the draft standards, we have also unpacked what we mean by QPDS being inclusive.
 - i. We have removed the reference to the user having a good experience. Respondents suggested this was too subjective and we should instead concentrate on the requirements in our design standards which would contribute to the user having a good experience. We agree with this and have made the necessary amendments.
 - j. We have removed the identified erroneous references to displaying holdernames when presenting pensions information. QPDS will be provided with the holdername but will also, through an API, be sent the name of the pension provider or scheme for each found pension. It's the name of the found pension which will be relevant to the user and not the holdername.
 - k. We have also removed the application of the design standards to the QPDS guest or user accounts. We agree with respondents who explained these were not for design standards as they did not relate to the display of pensions information and were operational issues for QPDS.
3. **Do you have any evidence to support your input?** Thank you to those who submitted further evidence to support your submissions.
 4. **Do you agree with our approach principles and assumptions (for developing our design standards)? In you or your organisation's experience (please provide evidence if you are able), are there any important principles or assumptions missing in our approach?** We have combined our analysis in respect of these questions as there was quite a bit of crossover in respect of the respondents' answers to these questions:
 - a. A minority of respondents wanted QPDS to be able to offer additional features beyond the presentation of pensions information. These would involve dashboards being able to undertake calculations. For example, some suggested allowing calculations on the QPDS would facilitate modelling capability and comparison tools (so users could relate their pensions against, say, someone else in a similar financial position or with similar retirement aims). This is not within

²⁵ [Approach to governance of standards | Pensions Dashboards Programme.](#)

- the gift of the PDP or the design standards and would require a change in the DWP's current dashboard policy and then a legislative change.
- b. It was suggested we should have user education as one of our principles. Increasing user awareness, sense of control, engagement with pensions and more informed user choices are overarching policy objectives for dashboards set by government. Design standards will aid user understanding and support these objectives under our user engagement requirement. We believe proper engagement can only result from understanding and understanding flows from education. We have made this clear in our proposals.
 - c. A theme that emerged from responses related to dashboards explaining the assumptions underlining the value data calculations. In particular, there was strong feeling that dashboards should explain the Financial Reporting Council's ASTM1 methodology and assumptions²⁶. It's the regulations and FCA regulatory framework have set out the values and pension information to be displayed on dashboards, and we are setting out our requirements for design standards within these regulations and regulatory framework. Under those requirements, dashboards are required to display the value data and indicate the methodology used to calculate them and explain what the terms mean. The regulations and FCA regulatory framework have stopped short of requiring pension providers and schemes to provide the detailed assumptions used to calculate these values as part of the pensions information to be displayed on dashboards. Mainly to avoid information overload for the user. However, some contextual information is required to be sent by pension providers and schemes to be displayed (e.g., whether there are any inflationary increases or not) and under design standards we propose to require dashboards to explain how values are calculated (including the risks associated with the calculation method).
 - d. We will not be adopting the DWP's design principles as suggested by some respondents. As we explained in the CFI, they have already influenced our approach to design standards, which detail our principles and assumptions.
 - e. A number of respondents suggested that we should have an approach where the minimum amount of information is presented to the user and then they have the opportunity to delve into further information under a cascade option. We agree with this, and we have adopted it through our summary approach.
5. **Are we right to favour the user needs over the QPDS' needs, where there is any conflict between them?** The overwhelming majority of responses to this question thought we were right to favour the user. Some questioned whether there ever would be this tension. They suggested the interests of both would always be aligned, especially as the QPDS has an interest in maintaining their client base. Regardless of the merits of that line of argument, no one took issue with the proposition and we have retained it.
 6. **Other comments:** There was a suggestion in respect of possible matches and allowing pension providers and schemes to communicate a reference code to the user on the QPDS to speed up resolution when the user contacted them. This was an excellent, efficient idea and we have made amendments to our data standards to facilitate this approach.

²⁶ [Actuaries | Actuarial Policy | Actuarial Standards | Actuarial Standard Technical Memorandum: AS TM1 Current Versions | Financial Reporting Council \(frc.org.uk\)](#).