Progress update report

April 2024

pensionsdashboardsprogramme.org.uk

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Foreword

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This is the ninth Pensions Dashboards Programme (PDP) progress update report, covering our work to deliver the technical solution and facilitate connection to the dashboards ecosystem. It looks back at our achievements since October 2023, as well as looking ahead to our focus areas for the next 6 months.

After a legal connection deadline of 31 October 2026 was set last year, the Department for Work and Pensions (DWP) has now published a revised staged timetable for connection in guidance, ahead of the 12 months' notice previously promised. PDP is continuing to engage with wider industry to prepare for the first connection date in April 2025. We're also working closely with our group of 20-plus volunteer participants on their connection, which should begin in August 2024.

Updated drafts of data standards for dashboards have now been shared with volunteer participants and will be published soon, and drafts of other standards are being refined with industry and our partners. At the same time, we're considering our approach to user testing of dashboards, and this report provides more detail of the work that we will be doing to get this underway.

We've also launched a new pensions dashboards advisory group, including the members of our previous steering group and 8 new people appointed in February this year. The advisory group helps us to further our goal of successful delivery of dashboards in collaboration with industry.

Thank you to all those who continue to provide support and co-operation to make dashboards a reality.

Connection timetable in guidance

In June 2023, DWP announced the previous mandatory connection timeline for pension providers and schemes set out in legislation would be replaced by single connection deadline supplemented by guidance on timings for connection. The Pensions Dashboards (Amendment) Regulations 2023 set out a legal connection deadline of 31 October 2026 by which all occupational pension schemes in scope will need to have connected to the pensions dashboards ecosystem. The same obligation for personal and stakeholder pensions was set out by the Financial Conduct Authority (FCA) in its Pensions Dashboards Rules for Pension Providers.

Following a commitment to provide at least 12 months' notice for the commencement of staging, DWP published the connection timetable in guidance in March 2024, ahead of the first 'connect by' date in April 2025. The guidance was shaped by extensive engagement with industry, supported by PDP, at the end of 2023.

As set out in a written statement, the guidance provides a series of 'connect by' dates for pension providers and schemes to connect to the ecosystem based on type and size. While the connection dates are not mandatory, providers and schemes must have regard to the guidance when planning for their connection. Failing to do so could result in enforcement action by the relevant regulator.

The connection timetable in guidance provides a phased approach to manage the volume and flow of connections. This helps ensure all pension providers and schemes connect to the ecosystem on time and in a stable and staggered way. Connecting in line with the staging timetable will also support more extensive user testing, which will in turn make it possible to make dashboards available to the public as soon as possible. The legal connection deadline provides certainty for industry and also ensures connection remains mandatory.

DWP also shared guidance on deferred connection in February 2024, setting out the issues pension schemes should consider if they wish to apply to defer connection beyond 31 October 2026. Any applications for a deferred connection will need to be made by 8 August 2024. The guidance outlines the specific circumstances in which schemes may apply.

PDP will work closely with industry, the government and regulators to ensure pension providers and schemes are aware of their connection dates and are ready to begin connecting.

Preparing for connection

There are two different paths to connect to the dashboards ecosystem: connecting directly, or contracting a third party to provide a connection solution. It is expected that most pension providers and schemes will connect to the ecosystem by contracting a third party, either through their administrator or an integrated service provider (ISP).

Pensions Dashboards Programme

PDP is currently preparing guidance on connection, and will develop an online connection hub, including the code of connection, which it expects to publish later in 2024. For those providers and schemes who are connecting via a third party, there will be guidance on the connection hub to explain when and how they should contact PDP regarding their connection plans and anything else they need to consider. Most of the preparatory work can be carried out with their ISP and administrator.

For those building their own direct route to connection, PDP is preparing to start connection testing with them later this year, which should help to support wider industry connection beginning in April 2025. Pension providers and schemes building their own connection that have not engaged with the programme will need to get in contact as soon as possible to discuss their connection plans by emailing supportpdp@maps.org.uk

The Pensions Regulator (TPR) has published guidance which sets out what pension providers and schemes should be doing in order to be ready for connection. The Pensions Administration Standards Association (PASA) also published guidance in December 2023. They include guidance on the evidence that trustees should expect to provide to demonstrate that all the required steps to connect to the ecosystem have been taken.

The programme is working with a group of 20-plus volunteer participants, made up of pension providers and schemes, third-party administrators and ISPs. This cohort is building a direct route to connection with the dashboards ecosystem. As part of the delivery plan, volunteer participants will begin connection testing later this year to be ready for the start of the wider industry connection dates in guidance.

As connection progresses, PDP will work with industry to further refine processes and ensure connection is made as smooth as possible.

Standards

The Money and Pensions Service (MaPS), via PDP, is empowered by law to set mandatory standards that will facilitate ongoing connection to the dashboards ecosystem. Towards the end of 2023, PDP undertook engagement on an updated draft version of data standards. These standards explain how pensions data that will be returned on a dashboard must be formatted by pension providers and schemes. The feedback has helped to further shape data standards. An updated draft was shared with PDP's volunteer participants at the end of March 2024, and will be published on PDP's website soon. This follows a commitment that data standards would be published around the same time as DWP's connection timetable in guidance. All standards are subject to final approval by the Secretary of State.

PDP is continuing to work on finalising updated versions of standards that will support connection testing and wider industry staging. These include technical and reporting standards, as well as the code of connection, which covers security, operational and service standards. They will be published once they have been tested and validated with volunteer participants who are building a direct route to connection.

PDP is also updating the draft design standards, which the MaPS MoneyHelper dashboard will align to and must be adhered to by other dashboard providers. In March 2024, HM Treasury amended the Regulated Activities Order to make the provision of a pensions dashboard a regulated activity. As such, all commercial dashboard providers need authorisation from the FCA. Dashboard providers will have to follow FCA conduct rules and PDP standards.

User testing

Once the first pension providers and schemes are connected to the live dashboards ecosystem, PDP will undertake testing with real individuals using the service to see real data about their pensions. This is crucial to ensuring that the service is working effectively and that the end-to-end user experience delivers a positive experience that meets users' needs. This type of testing can be carried out at scale and provide insights on, for example, user behaviour and the success of data matching. User testing will also inform the Secretary of State's decision-making around the date that pensions dashboard services will be launched to the public, known as the dashboards available point (DAP).

PDP is considering its approach to user testing and plans to launch a user testing and planning group later this year, to develop and coordinate plans for user testing of the live service once industry staging has begun. This will include defining testing requirements and the activities involved, how users will be invited to participate in testing the service in a controlled environment, volumes of users, and how insights from this testing will be gathered and reported on.

PDP has engaged with a range of individuals from industry and partners who are interested in getting involved with user testing and will help develop user testing plans. This has identified expertise and experience developed from testing other digital services with pension savers which will be invaluable in testing dashboards in the live environment.

There is a need to robustly test dashboards as they develop, whether that is in design, end-to-end journey completion, user experience or security. Within the Money and Pensions Service, working with DWP and industry partners (including members of the PASA dashboard working group), there is research and testing underway to continue to develop the design and build of the MoneyHelper dashboard as well as other aspects of the user journey. The outputs of this work will generate a clearer sense of priorities for testing in the live environment, which will be the time to invite our wider stakeholder community to contribute to user testing plans for this phase. PDP will keep industry and partners informed of plans as they develop, and will provide plenty of notice before we embark on live user testing.

Advisory group

In February 2024, PDP held an open recruitment process for new members of its pensions dashboards advisory group. This body replaces the previous steering group. The advisory group is tasked with providing advice and input on a range of emerging operational and delivery topics, as well as other issues that are relevant to the success of the programme. The group provides an opportunity for industry and other experts to offer insights and help shape the delivery of pensions dashboards.

Following an open application process and review by a selection panel, 8 new members have been appointed to the advisory group:

- Geraldine Brassett – Senior Consultant, Willis Towers Watson
- Matt Burrell – Public Affairs Manager, Phoenix
- David Cheetham – Associate Principal, Brightwell
- Chris Connelly – Chief Strategy Officer, Heywood Pension Technologies
- Claire Neale – Police Pension Advisor, National Police Chiefs Council
- Graham Peacock – Retirement Proposition Lead, FNZ Group
- David Poynton – Product Manager, Equisoft
- Mark Rowlands – Director of Customer Engagement, NEST Corporation

These new members join the existing 10 members of the former steering group:

- Yvonne Braun – ABI
- Francis Goss – Cognacity
- Paddy Greene – Which?
- Kim Gubler – PASA
- Dominic Lindley – Independent consumer representative
- Dr Will Lovegrove – University College London
- Andrew Lowe – IFoA
- Nigel Peaple – PLSA
- Romi Savova – PensionBee
- Samantha Seaton – Moneyhub

Industry engagement

PDP leads a range of groups and forums to support industry and to gain their input on dashboards, to shape connection processes and guidance. These include a connection forum, a dashboards forum and occasional discussion fora all, of which are open to anyone with an interest to attend. The programme also supports and collaborates with industry, regulators and the government through various working groups, including a connection delivery group for volunteer participants, and a communications working group involving a cross section of industry representatives. A connection working group for potential

dashboard providers will be set up at a later date, once FCA rules on operating a dashboard have been finalised.

PDP also attends a number of industry, government and regulator-led groups, such as the ABI dashboard working group, the PASA dashboard working group, a software providers group, a Third Party Administrators' forum led by The Pensions Regulator, and a Joint Industry Forum led by the Society of Pension Professionals.

Throughout the year, PDP undertakes regular engagement with industry to raise awareness of the programme, provide the latest updates and answer questions about preparing for dashboards. In the last 6 months, representatives from PDP have given presentations and spoken at panel discussions at various external events. These have included the Professional Pensions Admin and Data Forum, the PMI DB Conference and the Private and Public Pensions Summit. The programme has also participated in a number of external webinars, arranged by organisations including Equisoft, the Pensions Management Institute, Willis Towers Watson, RSM and ITM.

PDP has also continued running webinars hosted by senior members of the programme, with guest attendees from the government, regulators and industry. In October 2023, PDP provided a re-introduction to pensions dashboards, followed by an update on programme progress in November which had 447 attendees. In 2024, webinars attended by more than 300 people from across industry have focused on more technical aspects of dashboards, including understanding the central digital architecture and find and view data, and understanding additional voluntary contributions (AVCs) and value data. Most recently we ran one featuring DWP's connection timetable in guidance.

The programme also continues to publish updates and informative articles on its website. In the last 6 months, these have included a guide to the central digital architecture, an overview of how PDP is engaging with industry, an explanation of what the connection timetable in guidance means for industry, and a look back to progress made in 2023. PDP's blog also features posts addressing some of the more common queries that have come up, on topics including standards, testing and public availability of dashboards.

Guest blog posts and articles have been provided for a number of industry publications, newsletters and websites, such as Professional Pensions, mallowstreet, the ABI and the Charities Pensions Club. PDP continues to send out regular email newsletters to provide programme updates and answers to frequently asked questions.

Senior Responsible Owner appointment

PDP has appointed a new Senior Responsible Owner (SRO) to lead its activities as it prepares to begin connecting industry to the dashboards ecosystem.

Iain Patterson, who has held a range of roles in the public and private sectors, will bring his digital technology experience to support and ensure delivery of the programme. Iain joins PDP from his role as

Senior Strategic Technology Adviser in the Central Digital and Data Office, which is part of the Cabinet Office.

Chris Curry, PDP's current SRO, will remain as Principal. He will continue leading the programme's engagement with industry to maintain the successful collaboration on delivering dashboards.

MoneyHelper update

The MoneyHelper pensions dashboard project is progressing with the creation of an independent pensions dashboard. MaPS is conducting research involving a wide range of users to test the accessibility and understandability of the proposed solution. This will ensure that the MoneyHelper pensions dashboard will securely meet the varying needs of all dashboards customers, including those with access requirements and varied digital skill levels. The dashboard will integrate into MoneyHelper's existing pensions and retirement guidance to help people make informed decisions for later life. This service will be underpinned by a digitally enabled customer support model currently in design.

As with other dashboards, the MoneyHelper pensions dashboard will securely connect to the PDP's central digital architecture and align with PDP standards. The MoneyHelper project team is working closely with the PDP to ensure the MoneyHelper pension dashboard is ready for testing with pension providers at the earliest opportunity.

Updates from partners

Department for Work and Pensions (DWP)

DWP remains committed, together with its delivery partners, to delivering pensions dashboards safely and securely. The recent publication of a revised connection timetable in guidance marks another significant milestone towards launching a service that will help transform how savers plan for their retirement.

Whilst the timetable is not mandatory, given that it is being published to ease the connection journey, DWP would strongly encourage trustees or managers and pension scheme providers to follow the dates in this guidance unless there are exceptional circumstances which prevent them from doing so. Trustees or managers and pension scheme providers must have regard to the guidance, which includes the connection timetable. This means the guidance must be taken into account when making decisions around connection.

Trustees or managers and pension scheme providers will need to be able to demonstrate, upon request, how they have had regard to this guidance. Otherwise, this may result in enforcement action by the

relevant regulator. Industry's adherence to the connection timetable in guidance will help PDP to undertake user testing at scale and pace. In turn, this will inform the safe and secure launch of pensions dashboards for use by the public at the earliest possible point.

On 12 April 2024, the DWP published the which will help industry understand the value requirements set out for trustees and managers of occupational schemes (Regulation 26 and Schedule 3 in the Pensions Dashboard Regulations 2022) and to assist them to calculate the annualised accrued value of money purchase benefits. This document provides details on actuarial calculations methodology and will support the PDP's Data Standards publication that will be published in due course.

Financial Conduct Authority

Pension providers

In July, the Financial Conduct Authority (FCA) revised its pension dashboard rules for FCA regulated pension providers to align with the new 31 October 2026 deadline in the government's regulations. All firms in scope of those rules must have regard to the DWP's recently published guidance on connection: the staged timetable.

Pensions dashboard operators

Government recently amended the Regulated Activities Order (RAO) to bring the new activity of operating a Pensions Dashboard Service within FCA regulation. Subsequently, on 27 March, the FCA published CP24/4: Further consultation on the regulatory framework for pensions dashboard service firms which supplements the package of proposals it consulted on in CP22/25: Proposed regulatory framework for pensions dashboard service firms (CP22/25).

In CP22/24, the FCA is:

- consulting on guidance designed to help firms understand the scope of the new regulated activity and who will require FCA permission to undertake it
- inviting feedback on two substantive changes to the initial proposals in CP22/25

The consultation runs until 8 May 2024. The FCA will consider feedback to both CP22/25 and this further consultation (CP24/4) before finalising its full set of rules and guidance for pensions dashboard service firms.

The Pensions Regulator

Over the last few months The Pensions Regulator (TPR) has been supporting DWP and PDP in the development of the connection guidance and data standards. DWP's publication of the staged timetable marks a key step forward for pensions dashboards. In the meantime, TPR has been encouraging schemes and their third parties not to lose momentum on preparing their data. Its October communications campaign featured a downloadable checklist which breaks down the essential tasks schemes need to start to stay on track.

TPR remains committed to supporting schemes as they prepare for dashboards. It continues to engage regularly and actively with industry,both to set out expectations, but critically to identify challenges and work collaboratively to resolve these. Following the publication of DWP's guidance, TPR will be writing to all schemes at least 12 months ahead of their date and guide them on necessary actions to prepare effectively.

In the background, TPR is also revising its draft compliance and enforcement policy to reflect the current legislative framework, and putting in place the processes and data needed to monitor compliance, including trustees' duty to have regard to the new guidance.