

Pensions Dashboards - PDP publishes consultation on standards



Alert | 20 July 2022

Introduction

On 19 July 2022, the PDP published a [consultation on draft standards and guidance on pensions dashboards](#), along with a [call for input](#) on the design standards.

Key points

- The draft standards outline the mandatory requirements for dashboard providers and pension providers, detailing how operationally, technically and in practice they must meet their legislative duties.
- As well as the draft standards, the PDP is also consulting on draft guidance and its approach to governing the standards in the future.
- The PDP has also issued a “call for input” on its design standards, which will set out requirements for the presentation of the pensions data on dashboards and the design of dashboards.

Background

The PSA21 sets out a framework for the introduction of a pensions dashboard service, a digital interface that is designed to enable individuals to see all their pensions information in one place. Under draft regulations, which were [consulted on](#) earlier this year, trustees of schemes in scope (all registrable UK-based occupational pension schemes with 100 or more members, excluding pensioners) will need to:

- register their scheme with MaPS and connect to the “digital architecture” by their staging date
- ensure their scheme can receive both “find” requests (a request sent by the pension finder service to all schemes searching for a pension match) and “view” requests (a request to see the relevant pensions information)
- co-operate with MaPS when preparing to connect, maintain appropriate records, and report certain information to both TPR and MaPS.

Compliance with the dashboard requirements is being phased in from spring 2023, starting with master trusts and large DC schemes used for automatic enrolment.

The Pensions Dashboard Programme (“PDP”)

MaPS established the PDP back in 2019 to be responsible for designing and creating the dashboard ecosystem, which contains the digital architecture that is essential to make dashboards work. The PDP is a function of MaPS and is responsible for building and maintaining the central digital architecture for dashboards, as well the governance framework to support and enable the implementation and operation of multiple pensions dashboards.

Purpose of the consultation

The PDP is seeking views from “relevant stakeholders”, including trustees, other pension providers and organisations supporting pension providers with their dashboards duties, on:

- the content and application of the draft standards and guidance, and
- any areas where further clarification or detail is needed.

What are standards?

The “standards” are referred to in the draft regulations and are intended to “ensure the security, stability, and effective operation of dashboards”. They set out the technical and operational detail underpinning the legislation and outline the requirements for all pension providers and dashboards connecting to the dashboards ecosystem.

Compliance with the standards is mandatory. As the draft regulations require trustees to comply with the standards, any non-compliance would be considered a breach of the regulations and could therefore result in enforcement action being taken by TPR. It could also lead to disconnection from the dashboard ecosystem.

What standards are being consulted on?

Data standards

The data standards set out the data formatting requirements pension providers must follow when returning pensions data. They are intended to help the pensions industry build a common set of “message handling tools” to receive data from the pension finder service, or pensions dashboards, and reply with the appropriate data.

Reporting standards

The reporting standards provide a description of the data that both pension providers and dashboard providers must supply to regulatory bodies, the PDP and the DWP, to help monitor the effectiveness of the ecosystem.

Technical standards

The technical standards set out what data providers and dashboard providers will use to interface with the central technical architecture and/or each other.

Code of connection

The code of connection combines the required security, service and operational standards, which ecosystem participants must adhere to.

The code of connection sets out how data providers and dashboards providers are to connect to the dashboards ecosystem and what they need to do to remain connected. It sets out the mandatory requirements, as well as the recommended ways in which participants should implement them.

What else is being consulted on?

The following draft guidance is also out for consultation.

Data standards usage guide (recommended guidance)

The data standards usage guide describes the usage and purpose of the data, and explains when to send each section of data. It is intended to help pension providers understand how to choose which data items held in their systems are required and provides an explanation of the standard data definitions.

Connection process and guidance (statutory guidance)

The connection process and guidance sets out what connecting to the ecosystem will involve and explains what dashboard providers and pension providers should expect when connecting and the steps they will need to take. It also provides guidance on the likely duration of each step.

Early connection guidance (statutory guidance)

The early connection guidance sets out when pension providers can apply for earlier connection to the dashboard ecosystem than their connection date provided by TPR and the process they need to follow.

The draft guidance is either:

- statutory guidance, which pension providers must either follow, or have good reason for departing from. Where providers depart from this guidance, they should be able to demonstrate that they have achieved the same result via their alternative path, or
- “recommended” guidance, which should be implemented where possible to “enable optimal user outcomes”.

Approach to governance of standards

As well as the standards and guidance, the PDP is also consulting on its “approach to governance of standards”, setting out how it will monitor and review the standards, as well as the process for amending the standards in the future. Keeping the standards outside of legislation is intended to provide more flexibility and allow for further iteration and development as the service matures.

Design standards – call for input

The design standards will set out requirements for the presentation of the pensions data on dashboards and the design of dashboards, including “messaging, signposting and onward customer journeys”, which is intended to “ensure a consistently positive experience for users, regardless of which dashboard an individual chooses”.

The PDP has issued this “call for input” to get feedback and thoughts on its developing ideas for the design standards. It will use this input to help refine its proposals, before publishing draft design standards for consultation. The design standards are intended to be in place shortly after April 2023.

Next steps

The consultation and call for input both close on 30 August 2022. The PDP is aiming to publish its final standards (other than the design standards) shortly after the final regulations come into force, which is expected to be towards the end of this year.

In the meantime, trustees should be pressing ahead with their dashboard preparations and can use TPR's [recent guidance](#) and [checklist](#) to help with this.

For any assistance with your preparations, or if you would like to discuss any of the above, **please speak to your usual Sackers contact.**

Sacker & Partners LLP
20 Gresham Street
London EC2V 7JE
T +44 (0)20 7329 6699
E enquiries@sackers.com
www.sackers.com

Nothing stated in this document should be treated as an authoritative statement of the law on any particular aspect or in any specific case. Action should not be taken on the basis of this document alone. For specific advice on any particular aspect you should speak to your usual Sackers contact. © Sacker & Partners LLP July 2022