



**Response by TISA to:
Pensions Dashboards: staging call for input**
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About TISA

The Investing and Saving Alliance (TISA) is a unique, rapidly growing membership organisation for UK financial services.

Our ambition is to improve the financial wellbeing of all UK consumers. We do this by focusing the convening the power of our broad industry membership base around the key issues to deliver practical solutions and devise innovative, evidence-based strategic proposals for government, policy makers and regulators that address major consumer issues.

TISA membership is representative of **all sectors of the financial services industry**. We have **over 200-member firms involved in the supply and distribution of savings, investment products and associated services**, including the UK's major investment managers, retail banks, online platforms, insurance companies, pension providers, distributors, building societies, wealth managers, third party administrators, Fintech businesses, financial consultants, financial advisers, industry infrastructure providers and stockbrokers.

As consumers, the financial services industry and the economy react to and recover from the effects of the pandemic, the importance of the three key pillars of work that TISA prioritises has never been more apparent:

- **Strategic policy initiatives that influence policymakers** regarding the financial wellbeing of UK consumers & thereby enhancing the environment within which the industry operates in the key areas of **consumer guidance, retirement planning, later lifetime lending, vulnerable customers, financial education, savings and investments**.
- TISA is recognised for the **expert technical support provided to members** on a range of operational and regulatory issues targeted at improving infrastructure and processes, establishing standards of good practice and the interpretation and implementation of new rules and regulations covering **MiFID II, CASS, ESG/RSI, operational resilience, Cyber Risk, SM&CR** and a range of other areas.
- **Digital transformation initiatives** that are driving ground-breaking innovation and the development of industry infrastructure for greater operational effectiveness and revenue promoting opportunity for firms. TISA has become a major industry delivery organisation for consumer focused, digital industry infrastructure initiatives – **TISAtech** (a digital marketplace that brings together financial institutions and FinTechs for greater collaboration and innovation) and **TURN** (TISA Universal Reporting Network – a digital platform providing a secure data exchange for financial services using blockchain technology) – alongside projects **Digital ID** and **Open Savings & Investment**. This reflects TISA's commitment to open standards and independent governance.

Executive Summary

TISA welcomes the opportunity to respond to the PDP staging call for input.

We are strong supporters of Pension Dashboards and believe they have an integral role to play in the engagement and education of consumers, so they can make informed decisions throughout their entire pensions journey.

Whilst not specific to this consultation, it is important that an appropriate support framework accompanies the rollout of Dashboards. Guidance needs to be provided at scale to consumers of all ages, given the raft of information that consumers will be exposed to, many for the first time.

Although many of the questions relate to providers specifically, we agree in general with the staging process proposed. It is important that maximum coverage can be achieved as efficiently as possible during this period.

Clear and effective communication will be crucial during the live phase of the staging process. Users must be aware that their full entitlements may not be shown, otherwise the displayed entitlements may be considered as their total, and those who subsequently crystallise displayed pots may never see the need to revisit the Dashboard again.

Many providers are reliant on technology partners to provide the digital solutions required to participate. Timescales for readiness will therefore be taken out of provider's hands in these instances.

Given that the basic state pension will form a significant part of most individual's annual retirement income, it is crucial this is included at the very earliest possible stage.

Lastly, a great deal of confusion still exists over what has been agreed and what has not in terms of infrastructure and data standards. Generally, firms believe many principles have been agreed but the lower-level detail has not. It will be hard for firms to provide accurate answers to many of the questions raised until such time as full details are known and clearly communicated.

We look forward to our future involvement as the project progresses and would be happy to discuss any appropriate aspects with you.

Question responses

Question 1:

Q1: We will be sharing the content of your responses with DWP, TPR and FCA to feed into the government's policy development. Please confirm you are happy to be identified when we are sharing.

Yes, we are happy to be identified.

Q2: Please tell us the name of the organisation on whose behalf you're responding.

The Investing and Saving Alliance (TISA).

Q3: Please select which category/categories of respondent best represents you:

Consumer group.

Q4: [Pension & data providers:] Based on the information, how long do you estimate you will need to be ready to connect, and why? From what point in your working assumptions does the lead time start (eg draft regulations, regulations laid before parliament, or approved)?

Several pension providers will be dependent on their tech provider for a solution and this will determine timescales.

Q5: [Pension & data providers:] If different from your response to Q4, how long would it take you be able to provide all the required view data?

N/A

Q6: [Pension & data providers:] Would response time be material to onboarding ie would longer response times for ERI or accrued value information (rather than real-time) facilitate earlier staging? If so, what sort of response time would make a difference?

This will depend largely on the number of anticipated requests for information and confirmation of what ERI actually means. Currently there is confusion within the industry over what needs to be supplied e.g is ERI a SMPI or something different?

Q7: [Pension & Data Providers:] What further information, if any, do pension providers need to get ready for dashboards?

There are a number of moving parts currently still subject to consultation that will impact on the answer to this question. The final requirements for the Simpler Annual Benefit Statement has yet to be confirmed for instance.

More generally, there appears to be no clear understanding with providers of what the exact requirements are in terms of infrastructure, data, matching etc.

Although crystallised benefits are not being displayed initially, where an arrangement is partially crystallised should the uncrystallised element still be shown. If an arrangement has been subject to a partial UFPLS, should this be shown. Details such as this needs to also be worked through.

Q8: Do you have any further evidence on consumer needs and/or the acceptability of a dashboards service displaying partial information for a limited time?

During the interim period, if only partial information is communicated (e.g. not all schemes are participating), then this needs to be clearly communicated to consumers. If not, this could create a false sense of security and create more issues than it solves.

Q9: Do you see any barriers to early staging?

As per response to Q6.

Q10: This question particularly applies to data providers, what is your appetite for staging early? Are there things PDP could do to encourage you to onboard earlier?

On a general note, the question will be asked what is the point for us staging early if the dashboard is not up and running until an agreed level of participation is reached? Providers are likely to align staging to the agreed dates. There are some firms interested in early staging if the dashboard is functional at that time.

Q11: Do you agree with our recommendation to prioritise occupational schemes with 1,000+ members and FCA regulated providers in the first two years?

Yes – an overarching principle which should be adopted for staging is to do this with a priority of getting those schemes which represent the biggest % of entitlements onboarded at the earliest opportunity. It should be recognised however that some of the smaller schemes may be representative of the sort of pension pots which people tend to lose touch with, so this needs to be managed within the staging rollout.

Q12: Do you agree master trusts should be the first to stage? Do you have any further evidence that speaks to their deliverability?

Yes but no evidence.

Q13: Do you agree that non-commercial master trusts should stage as part of the next cohort? In the absence of a legal definition of non-commercial, is 20,000 members a suitable proxy to differentiate them from master trusts competing in the AE space?

Yes.

Q14: Do you agree FCA regulated pension providers should be among the first to stage? Do you have any further evidence that speaks to their deliverability?

Yes but no evidence.

Q15: Taking into account any existing plans to consolidate systems, and the potential to use an ISP (in-house or external), what specific challenges, if any, do FCA regulated providers of personal pensions face in getting all or part of their business dashboard-ready? Please provide evidence of the nature and scale of those challenges and how those challenges might be overcome.

Yes but they may be reliant of tech providers to provide the solutions, so this needs to be taken into account.

Q16: Do you agree that DC schemes used for AE should be the second cohort to stage? Do you have any evidence that speaks to the deliverability of this?

Yes but no evidence

Q17: Do you agree that non-commercial master trusts not included in cohort one should join cohort two?

Yes

Q18: Do you agree with the rationale for requiring mixed benefit schemes with DC sections used for AE to be part of cohort two? Do you have any evidence on the impact of this? How far does this differ from current disclosure practice ie issuing annual benefit statements? What is the scale of the population impacted?

No idea and no evidence

Q19: Do you agree the largest DB schemes should be staged from Autumn 2023 and all DB schemes with 1,000+ members should be staged within the first wave (within two years from April 2023)? Do you have any evidence that speaks to the deliverability of this?

Yes but no evidence

Q20: [DB schemes:] What are the specific challenges for DB schemes in connecting to dashboards? Which data elements are challenging, and why? Please provide any supporting evidence.

Frequency of data requests will provide some challenges in providing up to date information. It needs to be agreed if DB data is refreshed by the trustees/provider/administrator on a periodic basis.

Q21: [Largest DB schemes, over 50,000members:] When is the earliest in 2023 the largest DB schemes (over 50,000 members) could reasonably be expected to comply? Why? Please provide any supporting evidence.

N/A

Q22: Do you agree that all public service schemes should be staged as early as possible within the first wave? Do you have any evidence that speaks to the deliverability of this?

Yes but no evidence.

Q23: [Public sector schemes:] What specifically are the challenges presented by the McCloud Judgement for public service schemes in terms of dashboard readiness? What is the earliest that public service schemes could reasonably be expected to connect?

N/A

Q24: Do you agree that all remaining DC schemes with 1,000+ memberships should be staged by the end of the first wave (within two years of April 2023)? Do you have any evidence that speaks to the deliverability of this?

Yes but no evidence.

Q25: Do you have any additional evidence on the ability of medium schemes to participate in pensions dashboards?

N/A

Q26: Do you have any evidence about the potential impact on savers of deferring medium schemes until the bulk of large schemes have staged?

N/A

Q27: Do you agree that small and micro schemes should form a third wave, after large and medium schemes? If so, when would be a reasonable timeframe for staging these schemes, and why?

N/A

Q28: Do you have any evidence about the potential impact on savers (eg lost pots) if small and micro schemes were delayed until after 2025?

Consideration should be given to certain micro schemes where the likelihood of disengagement is low – such as a one-person SSAS.

Q29: Do you have any evidence of practical obstacles to our recommended sequencing and timing for staging?

N/A

Q30: How well do our recommendations meet the policy objectives and staging principles?

It feels that some of the policy objectives have been somewhat lost or blurred over time. It would be useful for these to be reiterated and when staging dates agree, communicate and format these in a similar way to the staging for employers during the rollout of AE.

Q31: Do you have any evidence on where lost pots are most likely to be located and the impact, therefore, of our staging recommendations on reconnecting savers with lost pots?

There are a variety of scheme types which may run higher risks of orphaned pots than others. Non-contributory DB schemes, rebate only PPs schemes where the branding has changed multiple times etc.

Q32: Do you have any evidence on equalities impacts of staging and impacts on under-pensioned groups?

No

Q33: As a data provider do you intend to connect your data via an ISP type solution? If not, what is your intended alternative?

N/A

Q34: As a pension provider will you work with your existing software provider or seek an alternative ISP provider?

N/A

Q35: If you are a software provider we would like to ask you a few more questions to further understand how your organisation is preparing for staging. Please choose Yes if you are happy to answer the four additional questions. Please choose No if you are not a software provider or you are a Software Provider not wanting to answer more questions.

N/A

Q36: [Software providers] As an existing software provider do you intend to extend your ISP offering beyond your existing client base?

N/A

Q37: [Software providers] Are you considering developing and providing an ISP solution as a new entrant into the market? What sectors of the market do you envisage providing ISP solutions to?

N/A

Q38: [Software providers] What is the anticipated lead time for bringing ISP solutions to market?

N/A

Q39: What factors will influence the pace at which ISP providers can connect clients to the dashboards ecosystem? What can be done to accelerate market coverage to better facilitate connectivity for data providers?

N/A

Q40: PDP would like to carry out additional research* with organisations who will be providing pension information for users to view on dashboards. We want to further understand what will be involved for you to successfully on-board with the pensions dashboards ecosystem and respond to these requests. If you're happy to be contacted about this, please include details of the people we can reach out to here:

N/A