



Response by TISA to:

**PDP Consultation: standards,
specifications and technical requirements**

Renny Biggins, Head of Retirement

renny.biggins@tisa.uk.com – 07802 324962

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 240 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** 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 – **TISAtch** (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 consultation - standards, specifications and technical requirements.

We are highly supportive of Pension Dashboards and recognise the potential that these have to engage consumers and ultimately enhance retirement outcomes.

We appreciate that the consultation itself covers a broad range of requirements, however a recurring theme we found when working through the consultation with our members is the need for lower level detail in several areas. There remains uncertainty as to the full requirements and obligations that are being placed on relevant firms. This makes it difficult to provide full and accurate responses to the questions.

In particular further information is required for complaints reporting – the bespoke nature of these mean the lower level detail is often not stored on administration systems. Confirmation of the full requirements with worked examples would help firms understand the full requirements and what this translates into for system build.

Response times is the other general area which requires further clarification. Given that there could be several firms involved in a dashboard proposition, there is a reliance that these are all functioning as intended to provide data. It is unclear when the clock starts ticking for measuring response times given this reliance. We would also expect an SLA to be defined as meeting a set percentage in the required timescales e.g. 95% of responses need to meet 2 seconds – could further details be provided.

More generally, given dashboards span across several governance bodies - FCA/DWP/TPR/FRC/PDP, it would be beneficial if the paper reflected this and provided a more holistic picture. This would be helpful, in particular for details around ERI and would reduce discrepancies such as whether arrangements which have been subject to a UFPLS are in scope or not.

To recap, our main recommendations are:

- Provide lower level detail on complaint reporting and response times with worked examples
- Encompass the requirements from all governance bodies to remove ambiguity and iron out discrepancies which exist

As we move ever closer towards the staging dates, the way in which dashboards are launched to the public will be crucial – we would be pleased to work with you in this regard and discuss any aspects of this response.

Question responses

Code of connection – security/service/operational

Do any of the proposed requirements pose a specific problem for your organisation, if so, what?

No specific problems have been identified based on the level of detail provided.

Are there any areas that you consider are missing from the code of connection?

PDP will send the primary contact a one-time security code. Could you confirm the format of the code and method of communication.

CoCo 2.2.1 States 'tbc' if Pel should be re-registered when a possible match becomes a confirmed match - please confirm. Please also confirm how re-registering a Pel would work in practice, as we understand a match would only occur on receipt of a new find request.

Do the proposed service levels seem reasonable for a digital service?

Yes

CoCo 2.1.3 requires view request responses within 2 seconds. This prioritises a fast response for the consumer. It may, however, create a barrier to calculating real time values for some providers. We would be particularly interested in views on this approach.

With regards to the proposed 2 second response and response times more generally, could more detail be provided with examples. We would expect the SLA to be based on X% of responses meeting the proposed timescales. Given responses are also reliant on third parties meeting their obligations, when does the response timescale commence?

Do the proposed steps for connecting to the dashboards ecosystem directly seem reasonable?

Yes

Do the proposed steps for connecting to the dashboards ecosystem (via a third-party connection) seem reasonable?

Yes

Does the proposed timeframe for completing these steps to connect seem reasonable?

Yes

Is it clear what pension providers/their third-party ISPs (Integrated Service Providers) or dashboard providers will need to do to connect?

Yes

Is there any additional guidance you need in relation to connection? And if so, what?

N/A

Data – format for matching and what is sent to Dashboard

Are you confident that the proposed data standards adequately cover the benefit structure of all pension providers? Can it express the correct values to all savers? If not, please share a brief description of the relevant benefit structure?

Further detail is required in this section to enable a more meaningful response.

There is currently a question as to whether arrangements which have been subject to a UFPLS withdrawal are in scope or not. DWP says they are, PDP says they are not. Which is correct?

Whilst we understand FRC are responsible for determining the calculation method for AS TM1, a more joined up approach to this section which would help schemes understand the requirements in more detail.

For DC schemes, the annualised value of the pot needs to be provided. This is new information that is not currently provided to scheme members today. It is crucial that this is provided in a clear and unambiguous way, so members understand what this figure relates to, the assumptions that have been used and the limitations which apply.

Does the ERI pot value relate to the value as at the date of calculation or the projected value at SRD?

How will dashboards deal with members who have left the scheme but ERI figures from the last SMPI are still visible?

What messaging is being proposed for arrangements which will not have a SMPI e.g. the value is less than £5,000 or the user has gone past their SRA?

The DWP recently announced an extension to the staging date for certain schemes. We understand there is a requirement for the FCA to adopt a similar approach, however nothing has yet been confirmed. Could it be clarified when further details will be published.

Can you confirm if the employment data items 2.202 and 2.203 are required for employer linked personal pensions?

Are the values allowed for the accrued (2.3xx) and ERI (Estimated Retirement Income) (2.4xx) warnings sufficient? Are there any other common reasons or scenarios you think these warnings should cover (bearing in mind we cannot support scheme-specific warnings).

The ERI is information that research shows is highly valued by members. It is essential that the information provided in the ERI is presented in a way which can be easily understood and not misinterpreted. Given members may base their retirements on the figures quoted, the limitations of illustrations and their nature needs to be clearly communicated.

Would the ability to add a short piece of free text to cover pension provider specific issues be workable for you, or introduce a new burden? If so, how many characters would be required and what topics would it cover?

We do not believe free text would add any value to the user experience and would create inconsistencies in member understanding. Where an arrangement is subject to specific rules such as a guaranteed annuity rate, a standard message should be included which directs the member to contact the scheme for further details.

Without a new unique reference to link two pension elements together, the benefit values may get presented separately in a dashboard. Would the requirement for a scheme to create that new reference and share it with their other administrators be more onerous than dealing with any potential downside from not presenting the benefit values together onscreen?

Given the employer's name should accompany any entitlement details where relevant, this should enable the user to identify where separate entitlements are linked e.g. occupational pension and an FSAVC – even where they are presented separately. This should be subject to user testing.

Design – layout/content/user journeys/messages

Do you have any challenges (or support) in relation to our developing policy on design standards?

No

Do you have any evidence to support your input?

N/A

Have we omitted any issues in developing our policy on design standards?

Do you agree with our approach to design standards principles and assumptions?

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?

Are we right to favour the user over the QPDS where there is any conflict between their needs?

The primary focus for all aspects of pension dashboards should be the user.

Reporting standards – data provided to regulators/MaPS

Please provide comments on our overall breadth of information required.

We do not believe this section goes into enough detail to provide full feedback. Lower level detail is required, in particular on how responses to the reporting provided is sent back to the scheme and the lower level detail required for complaints.

The individual nature of complaints does mean there can be a lot of data to store, which will often not be held on administration systems. Furthermore, there is already a reporting framework in place for complaints, so we do not see the benefit of this being duplicated.

Some worked examples along with lower level detail would be helpful.

Are there any technical barriers to you in supplying the reporting data?

Are there any barriers to providing both the auditing and monitoring data feeds in mostly near real time?

As highlighted in an earlier question, ‘real time’ needs to be defined more clearly – is this X% of 100 that need to meet the proposed SLA and given the reliance on third parties, at which point should the clock start ticking?

Management information and oversight data is to be provided daily. Do you have any alternative suggestions which would achieve our aims?

The transport method for data is to push data to an API housed on the central data architecture API gateway. Do you perceive any risks with this approach?

No

Technical – how to connect to central architecture and interoperate – API baseline design

Do any of the proposed requirements pose a specific challenge for your organisation?

The lack of lower level detail in several areas combined with the need and opportunity for conformance and sandbox testing means we cannot accurately answer this question.

It would be useful to know whether Alpha testing is achieving the standards and timescales that have been proposed.

Are there any areas where further detail is needed?

Yes, we believe all sections would benefit from a peer review with lower level information and worked examples provided as appropriate. This would be particularly helpful for the reporting section and details relating to time frames.

Additionally, it would be beneficial if the documents reflected a consistent view of DWP, FCA, TPR, FRC and PDP. Some sections such as the ERI are introducing new requirements and information that will be provided to users but do not provide the full details. A peer review would also iron out any discrepancies which exist such as whether plans which have been subject to a UFPLS are in scope or not.

Do the proposed service levels seem deliverable for your organisation?

Yes

Do the proposed timeframes seem reasonable?

Yes

Do you consider the notification requirement to be reasonable?

Yes

Do you consider the minimum requirement for at least a month's extension (for schemes with an existing date) to be reasonable?

Yes

Governance – maintaining and updating of standards

Do you have any comments on the change process and timeframes?

The process itself seems reasonable. We would emphasise that firms need to be provided with appropriate lead time to make all agreed changes. This should be reflective of the current pensions landscape and other regulatory changes that firms are dealing with.

Do you agree with our definitions of major and minor changes to the standards?

Are your clear on the differences between standards, statutory guidance and recommended practice?

Whilst the definitions are clear, we believe the documents would benefit from a peer review, to ensure the terminology is consistent throughout to avoid ambiguity.