



PDP: Design standards: consultation

- a. 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 agree in general with the principles-based approach, which provides the flexibility for schemes to innovate. However, there are areas where more prescription and/or guidance is required, in particular around the messaging content e.g. for assumptions and methodologies used (see response to j) to ensure consistent consumer understanding, irrespective of which PDS firm is used.

It would be useful if the consultation provided more E2E user journeys, in particular to cover delegated access and typical access scenarios, cross referencing standards that have already been agreed. Whilst we recognise there is a need for DWP/TPR, FCA and PDP to take responsibility for different components, the result of having separate consultations and publications makes the responsibilities blurred and the piecing together of the overarching user journeys challenging to understand.

We would request that there are several E2E user journeys created which covers the entire remit of Dashboards so we can fully understand the user experience.

- b. 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 agree that the right balance is being struck in some areas but it would be useful for firms to have minimum standards which must be achieved in others. The consultation refers throughout to extensive user research – it would be beneficial if this was shared in full with industry so we have the same insights as PDP and are put into a position where an accurate assessment can be made of the proposals. Minimum standards could include prescription and more guidance to ensure consumer outcomes are consistent, irrespective of which PDS firm is used to access their information.

- c. 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).**

The segmentation of the requirements and responsibilities which is highlighted in the multiple consultations that are in progress creates challenge for industry to join these all up into a seamless consumer journey. It would be useful if a single document was created which joins this all up to provide an overall picture, which will be crucial to support firms develop their respective propositions and understand their roles and responsibilities.



- 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?**

We agree with this approach.

- 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?**

When we consider the inclusivity of dashboards, we also need to ensure that user journeys are consistent across all PDS firms and the same levels of understanding derived from warning messages and signposting are achieved. A degree of prescription in some areas may be required to ensure that the broadly welcome flexibility does not compromise these outcomes.

- 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?**

It would be useful to share relevant details of the extensive user research to help consider the right approach. We need to ensure that there is a consistent level of consumer understanding generated through Dashboards – if different wording designed to convey the same message or warning does not achieve this, then there is a need for an element of prescription or guidance.

- 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?**

‘Neutral and logical’ are subjective terms and we believe more clarification is needed – especially given the importance of the information and potential consumer outcomes this could trigger. It would also be useful to understand what the consequences for a PDS firm would be if the presentation of information is not deemed ‘neutral and logical.’



- 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.**

Yes, we agree with this approach.

- 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?**

We agree with the information that should be displayed in the summary.

- 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.**

With regards to the groupings, can you please confirm what is meant by a 'single space.'

Where pension entitlements exist which are not connected, is the intention to group these together in a 'single space' in the same way that linked entitlements are, which could create a false perception of some sort of link or should they be displayed on separate screens or spaces?

- 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?**

We believe that graphical representations can have more impact and generate better engagement and understanding in some instances and agree that information should be able to be presented this way.

Given that the State Pension will play a significant part in many households' annual retirement income, it should be considered how best this could be displayed to assist with retirement planning.

- 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.**

We agree that the wording to differentiate the types of pension information displayed is important. This is an area where more guidance or prescription is crucial in order to generate consistent consumer understanding. Wording required to cover the requirements in 46a/b/c could vary considerably between PDS firms in terms of length, detail and complexity and run the risk of disengaging or misleading consumers, ultimately resulting in poor or no decisions being made.

- 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)?**

Yes, we agree with this approach.



- I. **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)?**

In order to help firms meet the requirements and build robust, consumer focused propositions, access to a variety of user journeys is needed, covering various and typical scenarios that will be experienced. A consumer is likely to be going back and forth through the screens to gain a better understanding of their pension entitlements and this level of detail from a user journey perspective has not been shared in any publications. This will help ensure PDS firms understand all the roles and responsibilities, the trigger points for warnings and communications and the intended user experience as a whole. This should encompass the delegated access journey.

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

The general feeling from our membership is that the piecemeal way in which the total requirements have been approached creates challenges in joining this all up and generates concern that gaps could exist or there is a lack of joining up, which lead to poor consumer outcomes and/or Dashboards not fulfilling their potential.

A single document which brings everything together would be useful, complete with a set of user journeys and details of the extensive user research that has been undertaken.

We also believe that there are several areas which require more guidance or an element of prescription to ensure that consistent consumer outcomes are experienced across all PDS firms.