



## **TPR: Dashboards compliance and enforcement policy: consultation document**

**Do you agree with the policy principles we have set out in this compliance and enforcement policy?**

Yes

**Do the key risk areas, within our regulatory remit, align to your understanding of where risks may exist for the saver? Are there any which are missing?**

It would be worth addressing the scenario where providers are running 'connected schemes' where relevant data should be provided to the PDS firm to enable them to be shown alongside each other in the core pension data view. If different schemes adopt different approaches or have a different understanding of what constitutes a 'connected or linked scheme', this could create inconsistent journeys and outcomes.

**Does the policy provide sufficient clarity on our expectations of governance bodies (trustees and scheme managers) and third parties?**

Whilst the policy outlines expectations, we believe this could be emphasised more strongly as it is crucial that these requirements are met if Pension Dashboards are going to achieve success and provide the consumer experience and outcomes as intended.

**Does the policy provide sufficient clarity on how we will monitor compliance?**

Yes

**Does the policy provide sufficient clarity on our approach to non-compliance?**

Yes

**Does the policy provide sufficient clarity on the elements we may take into consideration?**

Yes

**Does the policy provide sufficient clarity on the regulatory options and powers available to us?**

Yes



**Do you find the scenarios we have included assist with your understanding of our approach to compliance and enforcement?**

Yes, and as a principle, we find scenario examples a generally useful addition to consultation content which helps aid understanding and provides context.

**Are there any other key scenarios which you feel we need to include to provide additional clarity (bearing in mind we cannot give scheme specific advice)?**

With regards to matching and Scenario E, it would be useful to detail a similar or linked scenario where a potential match occurs and how this links into GDR requirements. Whilst we understand a scheme may hold not this data for up to 30 days, given there is no certainty the data relates to a customer, some schemes may be reluctant to retain this for the full period allowed. It would be useful to understand how this would be viewed by TPR and what the resulting action would be.

**Are there any aspects of our expectations you think would discriminate against, disadvantage or present an additional or exceptional challenge to anyone with a protected characteristic?**

A binary matching system and not showing possible matches could disadvantage certain groups, e.g. those ethnic groups with different naming conventions. For example, Chinese names usually start with the surname and then has the generational name and then the individual name. There may also be more potential for misspelling.

**Do you have any other comments on our draft compliance and enforcement policy?**

This is not specifically linked to TPR but it would be useful to have an ongoing dialogue between regulators and industry on the whole aspect of matching, how this is working in practice, lessons learnt etc. Given this is such an important area for schemes to get right and matching requirements between schemes will vary, this would help ensure the process is operating as intended and provide schemes with some confidence and certainty in their decision making.