



tisa

Leading on Investments and Savings

TISA Response to:

Pensions Dashboards: Working together for the consumer



28th January 2019

About TISA

TISA is a unique, rapidly growing, consumer focused membership organisation. Our ambition is to improve the financial wellbeing of all UK consumers. We work with our members 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.

Complementing our consumer policy development, TISA has become a major industry delivery organisation for consumer focused, digital industry infrastructure initiatives (TeX/STAR, Digital ID, MiFID II and Open Savings & Investment). This reflects TISA's commitment to open standards and independent governance.

TISA's current strategic policy and industry solution developments include:

- **Financial Guidance:** Making guidance more widely available to support financial decision making for those consumers who currently do not have access to advice.
- **Digital ID:** Development of a secure Digital ID for consumers of UK financial services. This will be key enabler for the digitisation of financial services.
- **Open Standards Development - Digitisation:** Building on TISA's range of open standards development projects (inc. TeX, MiFID II), TISA's members have launched a project to further open up UK financial services to consumers. This project - Open Savings & Investment – is aligned to the aims of Open Banking and has the core objective of enabling access to all savings and investments through the development/governance of industry open standards.
- **Financial education:** Helping young people manage finance, including KickStart Money - a three-year programme delivering financial education to 18,000 primary school children.
- **Retirement saving:** Strategic proposals for a holistic approach to saving for retirement.
- **Consumer engagement:** Focusing on vulnerable customers and millennials.

TISA also provides its members with support on a range of operational and technical issues targeted at improving infrastructure and processes, standards of good practice and the interpretation and implementation of new rules and regulations. This work currently includes: MiFID II, CASS, SM&CR and addressing cybercrime.

TISA members input to this response

TISA is pleased to present this response to the consultation which reflects a pan-industry viewpoint from TISA members representing:

- Pension providers – covering all major classes of legacy and current pension solutions
- Digital Platform Providers
- Distributors
- Industry Infrastructure providers.



The above-named organisations have contributed to this consultation response and were consulted in developing the responses in this report. None of the proposals should be assumed to be the individual policies of any of these organisations. They do, however, represent significant thought and debate and whilst not all organisations have had the same level of involvement, they all welcome the opportunities these proposals provide for a constructive dialogue with government, regulators and other financial services stakeholders.

Executive Summary

The pensions dashboard is an opportunity to re-engage millions of consumers with pensions saving and retirement decisions. Along with pension freedoms, government are looking to achieve a pensions landscape where the majority of consumers take personal responsibility for their retirement saving, assisted by higher levels of engagement and knowledge.

TISA fully supports the pensions dashboard and see this as a significant step change in the drive to help consumers in making informed decisions in their retirement planning, re-unite consumers with forgotten / lost pension pots and create a service that will secure overall improvements in consumers financial wellbeing.

We are pleased that the Single Financial Guidance Body (SFGB), supported by government, is to lead the Pensions Dashboards Delivery Group. TISA is well placed to support this work based on experience of similar initiatives and would welcome the opportunity to be actively involved in the Delivery Group.

This response combines the views of 16 TISA members who are leading financial services firms that are keen to be involved in the delivery of pension dashboards.

In summary – here are the key points covered in our response:

- The pensions dashboard will bring benefits to a large number of consumers – these benefits should be the core objective for the dashboard as it is designed / delivered.
- A dashboard solution which works for consumers will also have a positive impact on retirement solution providers who adopt the dashboard. Providers can harness these benefits and increase engagement, trust and confidence with their client bases. Ultimately, this translates into the pensions industry helping to rebuild the trust and confidence that has been eroded in recent years for various reasons.
- Open standards should be developed to support the collection / presentation of pension data to consumers. This will ensure the dashboard is developed in a way that secures its successful operation in the digital market, secures interoperability with other, related digital services and provides the basis to ensure the dashboard can be further evolved over time.
- A governance process needs to be developed to secure the control / on-going development of the open standards and the protection of consumers data / interests.
- There should be compulsion for all registered pension providers to provide data, to the required standard, to the dashboard.
- Government should make available state pension data to support the launch of the pensions dashboard.
- A Digital ID should be available at the launch of the dashboard to ensure consumers can securely identify themselves to dashboard providers. This Digital ID using standards that are compatible with the standards required by both UK financial services regulation and that required by government to release state pension data.
- It is important to identify timescales, both from an implementation / participation perspective and also from a legislative perspective. Government, industry and consumers need to have full clarity on what will be delivered, when it will be delivered and who the participants are throughout the implementation process.

- The dashboard should be free to a consumer to access, this is their personal information which is being displayed on the dashboard. If a consumer is charged an access fee, then take up will be lower and the potential benefits are lost. Furthermore, it could create negative perceptions of the pensions industry in general, the dashboard and pension providers.
- In order to set delivery timescales for the dashboard it will first be necessary to agree on the dashboards' remit, architecture and governance process. This will include agreeing the open standards required to collect and present the pension data in a consistent way, the means by which consumers will securely identify themselves to dashboard providers (Digital ID), the availability of state pension data and the phasing of the availability of data from pension providers.
- Delivery timescales can be optimised by re-use of the outputs from the dashboard feasibility study, current industry initiatives / bodies and the selection of a single provider for the Pension Finder Service (PFS) - based on the agreed open standards for the collection of data from pension providers. The provider of the PFS being the subject of a competitive selection process run by the dashboard delivery body.
- The information that the dashboard provides will be confusing and surprising to many consumers. With this increased exposure, combined with complicated and increased retirement options comes the need for consumers to seek support in deciding their next steps, whether this is pre, post or at-retirement. Whilst some consumers will receive regulated advice, the vast majority will not, and dashboards therefore create an inextricable link for the need for personalised guidance that supports informed decision making. Given there will be both public and private sector dashboards, we believe that industry needs to work in collaboration with government to agree the how this should be addressed in a way that offers some consistency for consumers.

We have gone into further detail on all the above points within the response from our TISA members.

Consultation questions and response

Wider benefits of a dashboard

Question I:

What are the potential costs and benefits of dashboards for:

a) individuals or members?

Consumer Benefits and Costs:

- The ability for a consumer to see their total pension savings (which make up a key part of their retirement savings) within a single dashboard will help aid a consumer's understanding of the progression they are making towards their retirement, particularly if this is also translated into an estimated retirement income. This will allow a consumer to start to take more control for their financial planning and wellbeing.
- Allowing a consumer to benchmark themselves against any existing or future expectations is an important aspect of engagement and will enable them to begin to consciously shape what their retirement might look like. Research has further shown that enabling consumers to benchmark their progress against their peer group can motivate consumers in making changes to improve their retirement planning.
- With an estimated £20 billion¹ of orphaned pension assets, the dashboard will help those who use it to reconnect with these pots and enhance their retirement outcomes.
- The pensions dashboard should help reduce the cost of advice. Having details of all a consumer's pension savings and which provider they are held with will reduce the initial work an adviser needs to undertake. However, benefits which would help reduce advice costs further are likely to be released in future phases of the development of dashboards (for example by adding non-pension savings such as ISA, cash accounts etc).
- In delivering all of the above benefits, it is crucial that the data presented to the consumer via the dashboard and associated calculations should be undertaken and displayed in a consistent manner, defined by a set of governed open standards designed to ensure consumers receive the right information in the same format, wherever they view their dashboard. Furthermore, the governance should protect the interests of consumers by ensuring only authorised agents (FCA regulated or government bodies) are allowed to use the standards and that they are protected if their data is mis-used or lost – please see below points on standards and governance.
- Further – in securing the consumer benefits summarised above, it is key that the scope of data provided to consumers is such that all a consumer's pension savings are covered by the dashboard (including the State Pension) – please see below points on compulsion.
- There should be no costs to the consumer for the use of the dashboard - unless the provider of the dashboard offers additional services to support the consumer in their decision making resulting from the provision of the dashboard data.

¹ PPI Briefing Note 109

Pension Provider Benefits and Costs:

- The development of pensions dashboards will help secure a number of significant benefits for pension services providers depending on their role in product provision and distribution – these include:
 - Being able to reconnect with clients through the provision of a modern digital service.
 - Building their relationship with their clients and supporting them in meeting their retirement plans / needs.
 - If embraced in their regular pension reporting to clients, it could potentially improve the quality and completeness of reporting.
 - Opens up the opportunity for providers to build on the dashboard to provide related digital / non-digital services that support their advice and guidance businesses.
- Costs for Pension Providers:
 - Many pension providers will have to make significant investments in the delivery of the data to support the dashboard due to the legacy (pre-digital) nature of their pension administration systems. Newer generation pension providers (AE / Master Trusts / online platform enabled providers) will have lower costs due to their more modern systems.
 - Both pension and dashboard providers will have to support the costs for their involvement in the development of the dashboard but will expect government to make available the budgets to support the SFGB relating to the delivery of the dashboard, and the costs relating to the provision of State Pension data to the dashboard. The government through this commitment could see long term benefits to the state as consumers become more self-reliant and better able to continue (as they move into retirement) to contribute to the consumer spending that supports the UK economy.
 - Some pension providers may not support the dashboard delivery unless there is compulsion to ensure all providers supply pension data to the dashboard – this position being based on the requirement for full pension data coverage to deliver the consumer benefits defined above.

Related key matters

- The value proposition of the dashboard (including the key features) and the consumer benefits need to be clearly articulated, supported and communicated by government and the SFGB; these should be developed and tested with different consumer segments.
- The Pensions Dashboard Delivery Group should develop a plan on how to build consumer awareness of pensions dashboards and their benefits, increase consumer engagement and potential to deliver better financial outcomes. The cost to access the basic dashboard service should be free to the consumer, whether it is the public model, or an industry backed dashboard. They should all display the same basic information.

- Should industry models wish to provide ancillary services to help consumers make decisions based on the information provided, then it is up to the provider to develop a transparent commercial fee structure.

b) your business (or different elements within it)?

Whilst there is no direct benefit to TISA, we see the pensions dashboard as a key element in our campaign to improve the financial wellbeing of UK consumers. The benefits articulated in the answer above highlight the transformative potential of the dashboard to help people plan their longer-term finances.

Architecture, data and security

Question II:

Do you agree with:

- a) our key findings on our proposed architectural elements; and**
- b) our proposed architectural design principles?**

If not, please explain why.

- We broadly agree with the architectural elements proposed, however more detail is required in defining the different relationships between each element and there could be additional elements required to deliver this, especially for different use cases (such as Delegated Authority/Power of Attorney).
- It is vital that the dashboard operates using open standards in a similar way to Open Banking. This has already been successfully tested with the prototype model so there is no need to re-engineer the architecture, however the model should be future proofed to ensure the dashboard can evolve and interact with other initiatives such as Open Banking over time and is not constrained through technology issues.
- Open standards are successfully demonstrated through the industry's development of the open standards for ISA, investment and pension transfers (see points below on TeX and STAR). These will support the data collection from pension providers, the data presentation to the consumer and the calculations that support the presentation of the data to the consumer.
- It is also worth noting at this point that the architecture needs to incorporate a comprehensive picture of the required governance which will be necessary to ensure appropriate transparency, and detail to allow for multiple participants to provide both authentication processes for customers and consumer-facing dashboards. We have included further detail on governance in XIII.
- A Digital Identity Service is a key enabler for any pensions dashboard; this identity service allowing consumers to securely identify themselves to the pension dashboard. Key considerations in the development of this component of the architecture are:

- A digital identity service must be available at the launch of the dashboard and should be seen as a key priority for the initial dashboard delivery.
 - The identity standards employed must meet the needs of the industry and its associated regulatory requirements.
 - The identity standards employed allow for government data on the State Pension to be passed to the pension dashboard.
 - The standards employed by industry and government must be compatible and work together in a seamless way for consumers.
 - The identity service must allow consumers to identify themselves to government, pension providers, the Pension Finder Service (PFS) and dashboard providers.
 - The identity service must be simple to use for consumers and, once a consumer has secured their Digital ID, allow its reuse for secure access to both SFGB and non-SFGB dashboards.
 - The identity service must allow for the maximum number of consumers to be successfully validated (inc vulnerable and 'thin-file' consumers).
 - The identity service must be free to the consumer to set up and use, the identity data should not be monetised.
- TISA is leading an industry wide project that is developing a Digital ID scheme for consumers of UK financial services. This project includes defining the standards, a trust framework, a technical/architectural design and business case. The TISA project is working with the Government Digital Service's Verify team to ensure the standards employed by industry are fully aligned with the Verify standards.

The verification and validation standards for the industry Digital ID project are principally based on the JMLSG guidelines and FCA Anti-Money Laundering regulation, however it is working towards being interoperable with Verify's Standards that are based on GPG 44 and 45. It is recommended that the Delivery Group decide which set of standards the identity authentication requirements are based on, however these should aim to be interoperable with GPG 45 and 44. The identity data may also be stored by the identity scheme and identity providers, as well as the pension scheme provider.

TISA will be very happy to share its work on the project and the identity standards it is employing.
 - The dashboard should be able to store client data with explicit consent (which can be removed in the same way). This will enable the dashboard to be used to provide ancillary services to enhance the consumer experience, which will require the details provided through the search request. Consent will not be a one-off event and we need to follow how Open Banking operates as closely as possible.
 - Upon access to the dashboard, the Pension Finder Service (PFS) will locate the relevant pension pots. Schemes should provide directly to the dashboard originating the request details of the latest valuation they hold and the valuation date. This means that valuations may be almost current (e.g. a Master Trust workplace pension scheme which is typically priced daily) or less current (e.g. a DB scheme).

Providing a complete picture

Question III:

Is a legislative framework that compels pension providers to participate the best way to deliver dashboards within a reasonable timeframe?

- Yes, we believe that in order for the dashboard to become as effective as possible, it needs participation from all pension schemes to ensure it provides a complete picture of all consumers' pension entitlements.
- If all pension savings are not included then consumers will quickly lose confidence in the dashboard, will stop using it and all potential benefits will be lost as it will be difficult to get people to re-engage again in the future. The only way in which this can be achieved is to legislate for mandatory participation over a timeframe.
- The dashboard should be project managed and broken down into phased releases, with each new release bringing increased consumer data and/or functionality. The Delivery Group should agree on initial scope for all releases.
- The Delivery Group will need to consider which pension products should be included for Day 1 and future releases. When legislation is written, it needs flexibility to allow for the inclusion of non-pension products over time in accordance with consumer demand.

Question IV:

Do you agree that all Small Self-Administered Schemes (SSAS) and Executive Pension Plans (EPP) should be exempt from compulsion, although they should be allowed to participate on a voluntary basis?

- No, although there may be some valid reasons for certain schemes being exempt, there is no guarantee that all members with benefits held in these wrappers will be aware that they have an entitlement and some of these pots may be significant.
- The creation of an exemption category will also lead to other schemes applying for similar treatment. To retain simplicity and ensure the dashboard meets its objective, all registered pension schemes should participate to ensure 100% coverage is met and there are no doubts that a consumer could be misled by the information displayed.

Question V:

Are there other categories of pension scheme that should be made exempt, and if so, why?

No, as per question IV we believe all registered pension schemes should provide the relevant data to the dashboard in line with the agreed timeframe.

Implementing dashboards

Question VI:

Our expectation is that schemes such as Master Trusts will be able to supply data from 2019/20. Is this achievable? Are other scheme types in a position to supply data in this timeframe?

- The priority is to develop open standards for the collection and presentation of pension data with subsequent application of the standards together with the security infrastructure before any data is collected. Open standards encourage competition and innovation which translates into enhanced services and reduced costs for the consumer and industry. Without this, then no schemes will be in a position to provide data.
- As the State Pension forms a significant part of most individuals' retirement income, this should be considered a priority for the initial implementation. The government needs to provide a commitment that they can provide State Pension data to the dashboard in a timely manner for Day 1 without adversely impacting timeframes.
- Legislation should ensure that public sector pension schemes provide the relevant data to the dashboard within the agreed timeframes.
- The initial wave of pension schemes on-boarding should be conducted on a voluntary basis. There are various benefits to schemes providing the data earlier than later, not least in the build-up of trust and confidence from their consumer base. It is important that there are sufficient schemes providing data for launch to ensure the dashboard engages consumers and that it is of value. The Delivery Group should determine which schemes should provide the data in the relevant timescales and this is, in part, dependent on the data set that is required. It may not be possible to include specific pension scheme types within a single timeframe, as a scheme type can be quite broad e.g. SIPP and the technology employed can vary significantly.
- It is important that consumers are aware which schemes are not currently providing data to ensure they do not disregard pots that they may have but are not showing.

Question VII:

Do you agree that 3-4 years from the introduction of the first public facing dashboards is a reasonable timeframe for the majority of eligible schemes to be supplying their data to dashboards?

- Four years from enactment of legislation is too long. We recognise that schemes will need to perform data cleanses to ensure the data quality is sufficient to meet the requirements of the dashboard standards and this may be more challenging for some types of schemes than others. A fixed date needs to be agreed by government and industry to provide everyone with the necessary clarity.
- As previously mentioned, the priority is to develop open standards for the collection and presentation of pension data with subsequent application of the standards together with the security infrastructure.

- We then need to balance a timescale which allows schemes appropriate time to gear up to providing this information with the fact that the dashboard will be operating without 100% coverage for some years.
- Assuming the dashboard adopts a phased implementation with various releases which build up information and functionality over time, scheme focus should be placed on the data fields that are aligned to dashboard requirements initially, although it is highly likely that there will be a percentage of pension pots where the current data cannot be found i.e. it is an orphaned pot.
- We need to accept that there may be a small percentage of scheme members who simply cannot be traced, and their data cannot be provided to the PFS.
- It is vital that industry has a role to play in helping construct the content of the legislation to ensure this meets industry and government requirements and for government to confirm when this is likely to be enacted.
- It will be important that consumers are aware that the dashboard may not provide a complete picture of their pension entitlements until all schemes are participating. Without this awareness, the dashboard could end up causing consumers to disregard non- displayed pension pots which they thought they may have had.

Question VIII:

Are there certain types of information that should not be allowed to feature on dashboards in order to safeguard consumers? If so, why? Are there any other similar risks surrounding information or functionality that should be taken account of by government?

- It is important that the Delivery Group consider how the data provided to the dashboard might be used by third parties and deem what is an appropriate level of information to meet the dashboard objectives and protect the interests of consumers. For instance, the inclusion of a Defined Benefit current estimated transfer value will allow many scheme members exposure to this information for the first time. This could then provide a motivation to transfer which would not have otherwise existed and allow third parties to use this data for potential transfers out.
- It is crucial that financial guidance or advice is sought prior to the taking of pension benefits. We should not be considering using the dashboard as a platform from which such retirement decisions can be triggered.
- It is important that the consumer knows where they can go next to help them understand the information they have just received via the dashboard and also help them determine what the next steps are. It is therefore very important that they are signposted to the SFGB, seek regulated financial advice or speak to their providers. Although not an objective of the dashboard project, there is an inextricable link between this and the need for a wider guidance framework to be put in place, where industry and government can provide tailored guidance, confident in the knowledge they are not straying into advice. Please see the section on Financial Guidance at the end of this response for further detail.

Question IX:

Do you agree with a phased approach to building the dashboard service including, for example, that the project starts with a non-commercial dashboard and the service (information, functionality and multiple dashboards) is expanded over time?

- Yes, we do not want to delay the implementation of the dashboard until we have a version with all the bells and whistles.
- We should be looking to provide a Minimum Viable Product which provides the basic information such as where the pot is held and fund value. Once this initial framework is up and functioning on a day to day basis, that is the time to consider increased functionality and have this implemented through a strict governance framework which ensures consistency.
- The Delivery Group should be responsible for determining what information and functionality is to be included through the creation of a backlog and each item can then be allocated to future phases based on deemed priority.
- There may not be the need to restrict a multi-dashboard model from day one if these meet the same standards as the non-commercial dashboard and the required governance of the standards has been implemented to protect the interests of consumers. It is important here to recognise that it is governance which should determine when a dashboard is ready to launch. If all the governance requirements have been met, then it should be largely irrelevant whether it is a non-commercial or commercial model which is first to market.
- It is crucial that the Delivery Group membership must be representative of all relevant industry areas.

Question X:

Do you agree that there should be only one Pension Finder Service? If not, how would you describe an alternative approach, what would be the benefits and risks of this model and how would any risks be mitigated?

- A single Pension Finder Service (PFS) provides a coherent platform and removes much of the complexity for dashboards and Integrated Service Providers (ISPs). This lowers the barrier to entry for technology companies to innovate at the dashboard and at the ISP layers in an open, competitive, low cost market. A single PFS will allow the dashboard to be brought to market in a timely fashion and for consumers to access the benefits more quickly than if a multiple PFS approach is used.
- Also – a single PFS at the start of the implementation of the pension dashboard will reduce the complexity of the project and allow for the testing of the open standards used in the collection of pension data. Multiple PFS' would make the initial implementation more complex and will complicate the testing / resolution of issues relating to the data collection standards.
- By employing open standards in the collection of pension data, the Delivery Group can select the best provider to support the delivery of the PFS.

- As the dashboard evolves through an open architecture environment which promotes open standards, competition and innovation, there may be a different PFS supplier for the industry to consider in the future; the use of open standards allowing the industry to adopt different suppliers of the PFS if there is commercial or functionality issues relating to the selected PFS provider. However, our key focus should be delivering the dashboard successfully within the agreed timeframes which currently aligns with the single PFS structure.
- We have attached a comprehensive report on the Role of the Pension Finder Service by Origo to the email submission.

Protecting the consumer

Question XI:

Our assumption is that information and functionality will be covered by existing regulation. Do you agree and if not, what are the additional activities that are not covered?

- Yes, regulation should cover what will be supplied by the dashboard, seeing as this is just another medium of providing existing information to consumers. As the functionality is enhanced over time, new regulation may be required dependent on the change.
- The Delivery Group will need to consider the transposition of eIDAS if the pensions dashboards are to rely on European nationals wishing to assert their identity from other Member States.
- All dashboard providers should be appropriately regulated to ensure that governance standards are met and to act as a deterrent to prevent bogus schemes from accessing dashboard services.
- In order to ensure the dashboard does not create additional opportunities and subsequent evidence of scam activity, the existing rules in place should be reviewed and extended if required to meet digital services.
- It is also worth noting at this point that the architecture needs to incorporate a comprehensive picture of the required governance which will be necessary to ensure appropriate transparency and detail to allow for multiple participants to provide both authentication processes for customers and consumer-facing dashboards. We have included further detail on governance in XIII.

Accessing dashboard services

Question XII:

Do people with protected characteristics, or any customers in vulnerable circumstances, have particular needs for accessing and using dashboard services that should be catered for?

- We all have the potential to be vulnerable either once or several times throughout life. The dashboard or data provider cannot know whether a user is vulnerable at the time of access. It is therefore crucial that all information is clearly displayed and calculated in a consistent manner, the dashboard remit is clearly communicated and the existing regime covering vulnerable clients is extended to cover the dashboard.
- It will be necessary for the non-commercial model and potentially commercial models to operate dashboard services through a non-digital channel to cater for those who do not have access to digital services i.e. provide a telephone service where the same levels of security are employed, and the same level of dashboard information can be provided.
- The Digital ID programme (outlined above) is also focused on how to create and verify digital identities for those that have no or little credit history and for vulnerable groups (such as those with dementia). This work can be shared with the Delivery Group. In accessing dashboards, accessibility issues need to be considered for groups with visual or cognitive impairments.
- The governance structure described above will support the protection of vulnerable consumers.

Governance

Question XIII:

The department has proposed a governance structure which it believes will facilitate industry to develop and deliver a dashboard. Do you agree with this approach? If not, what, if anything, is missing or what workable alternative would you propose which meets the principles set out in this report?

- Yes, this approach seems sensible and enables government and appropriate industry representatives to work in collaboration to deliver the dashboard and maximise the consumer benefits.
- In addition to the delivery governance a means to secure the governance and use of the open standards underpinning the dashboard needs to be established.
- Open Banking, TISA Exchange (TeX) and STAR are prime examples of how industry can create and maintain effective governance frameworks for open standards.
- The governance of the open standards underpinning the pension dashboard needs to include:
 - On-going development and maintenance of the open standards supporting the dashboard.
 - Service Level Agreements (SLAs) associated with the application of the standards.
 - Due diligence and authentication of dashboard providers.
 - Collection, analysis and distribution of relevant MI to support an understanding of the operation and usage of the dashboard.
 - Complaint and dispute resolution processes.
 - Protection of consumers data (meeting all regulatory requirements).
 - Liability management – protecting all stakeholders.

- It is proposed that there is a need for a programme of stakeholder management to ensure and enable industry participation, especially if there is to be a small Delivery Group.

Costs and funding

Question XIV:

What is the fairest way of ensuring that those organisations who stand to gain most from dashboard services pay and what is the best mechanism for achieving this?

- The SFGB must be provided with sufficient government funding to enable it to effectively lead, govern and support this initiative both within the project initiation implementation phases and on an ongoing basis. Similarly, DWP must be provided with the funding necessary to enable it to support the provision of basic State Pension data to the dashboard as this forms a significant segment of many consumer's retirement income.
- It will be hard to determine which organisations will gain most from the dashboard. This will be dependent in part on what can be facilitated through the dashboard throughout the release of the various phases. The funding structure should be determined by the Delivery Group using existing levy models, applying agreed metrics to ensure costs are apportioned fairly.
- To reiterate a point made in question I, the cost to access the basic dashboard service should be free to the consumer. This aspect should be included in the overarching governance process which can be best achieved using a Not for Profit industry body, operating in a similar way to TeX, which is a cross industry initiative supporting the common standards and SLAs for electronic transfers of wrappers and assets and is funded by the participating providers.

General

Question XV:

Do you have any other comments on the proposed delivery model and consumer offer?

- It is imperative that open standards are adopted to enable the collection and presentation of consumer's pension data. The agreement of these standards should be the first step to then assess implementation requirements and timelines. Open standards encourage competition and innovation which translates into enhanced services and reduced costs for the consumer and industry.
- The governance of standards can be best achieved using a Not for Profit industry body, operating in a similar way to TeX and STAR, which is a cross industry initiative supporting the common standards and SLAs for electronic transfers of wrappers and assets and is funded by the participating providers.
- The security of consumers' data is a fundamental requirement and the identity service is a key enabler for any pensions dashboard. TISA is leading an industry wide programme that is developing a Digital ID scheme for financial services, which includes defining standards, a Trust Framework, a technical/architectural approach and business case. TISA will share more detail from this programme into the pensions dashboard to ensure it is interoperable and there isn't any unnecessary duplication of work.

- The SFGB must be provided with sufficient government funding to enable it to effectively lead, govern and support this initiative both within the project initiation implementation phases and on an ongoing basis. Similarly, DWP must be provided with the funding necessary to enable it to support the provision of basic State Pension data to the dashboard as this forms a significant segment of many consumer's retirement income.
- The Delivery Group should be representative of all areas of the industry which have a connection with the dashboard initiative.
- The 2019/20 timeline is ambitious, so it is important that all decisions are made quickly.
- TISA is interested in sharing its expertise and experience in developing industry wide capabilities required to support the dashboard and to feed in the industry work it is undertaking in the development of financial guidance for consumers, development of a Digital ID for UK consumers and Open Savings & Investment, as well as its experience in the development of TeX.

Financial Guidance

The launch of pensions dashboards needs to be accompanied by appropriate financial guidance to support consumers in understanding the data being presented plus help them to engage in taking actions that will enhance their future financial wellbeing. While not linked to the dashboard project and should not hold up the delivery of the dashboard, it is important that consideration is given to how consumers will be supported in the use of the dashboard for the following reasons:

- The dashboard will be providing important and often crucial information to consumers, many of which will not comprehend the data or know what their next steps should be.
- Only 8% of the adult UK population (4m) received financial advice in 2017², with 92% relying upon other sources to make financial decisions, including guidance.
- This means that the guidance support received in relation to the pensions data will be a critical factor in the successful usage and consumer outcomes delivered by the pensions dashboard.
- Given that the SFGB is expected to launch a pensions dashboard in 2019, we recommend that the project include a workstream that is dedicated to testing the likely consumer needs and to develop suitable financial guidance support to meet those needs, such that this is launched in tandem with the pensions dashboard.

Furthermore, the workstream should also consider the wider need for financial guidance that will arise from dashboards offered by the private sector, bearing in mind that some of these organisations (particularly regulated financial services firms) may be well placed to offer appropriate guidance and others would be better placed referring consumers back to the SFGB dashboard guidance.

² FCA Financial Lives Survey 2017