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Email: enquiries@fs-cp.org.uk

19 July 2022

By email: pensionsdashboard@dwp.gov.uk

Dear Sir / Madam,

Financial Services Consumer Panel response to DWP's consultation on Pension Dashboards: Further Consultation

The Financial Services Consumer Panel (the Panel) is an independent statutory body. We represent the interests of individual and small business consumers in the development of policy and regulation of financial services in the UK.

The Panel welcomes the opportunity to respond to the Government's consultation on Pension Dashboard Regulations. Our responses to the questions posed in the consultation are included at Annex A below.

The Panel responded to DWP's previous consultation on Pension Dashboards. Please see a copy of our response in Annex B.

Yours sincerely,

Helen Charlton

Chair, Financial Services Consumer Panel

Annex A - Questions

Question 1 – Do you agree that 90 days is a reasonable period between the DAP formally being announced, and the DAP itself?

The Panel believe that a DAP should only be announced when Dashboards are at the stage whereby they cover a large majority of the adult population. This should not just consist of a large majority of consumers who are genuinely engaged with their pensions, but all consumers. Importantly, this includes consumers in vulnerable circumstances and those who are digitally excluded. Firms will need to consider what additional support these consumers may need so that they can access and realise the benefits of the Dashboards.

Pension Dashboards are a genuine opportunity to increase engagement and understanding of pensions. The Panel would encourage a DAP being announced when:

- The dashboards have been through rigorous testing, are fully functional and user friendly
- Technological aspects of the dashboard are in full operation – no glitches no data sharing issues etc.
- All consumers (or a large majority) are able to access their pension information on the dashboard

It is critical that the DAP announcement and the DAP itself come at a time where the Dashboard is accessible and 'user friendly'. Otherwise, this may lead to consumers who would have engaged, disengaging as the technology does not work or they cannot access their details.

The Panel would also request consideration of communications around the DAP announcement – some consumers may not be aware of the Dashboard and its purposes. It is crucial that announcements are advertised through a range of channels, including but not limited to mediums that consumers would regularly access in their everyday lives, such as social media (this will help with consumer awareness), and that any communications are jargon free.

The Panel believe that 90 days is a reasonable period, however would stress that Dashboards should be fully operational and accessible from the DAP date. It is also important that prior to and following announcement of the DAP, DWP works with relevant stakeholders to support delivery to the 90-day deadline

Industry has expressed concern that 90 days is an insufficient length of time. We would encourage DWP to maintain the 90-day period unless industry provide evidence that additional time is needed and a clear explanation of what that time would be used for. The Panel remains concerned about the imbalance between the industry and consumer voice in influencing financial services regulation. Given the benefits of the Dashboards to consumers, we support prompt implementation and suggest DWP set a high bar for any delay.

As the DWP will be aware, the Government's Service Manual contains valuable guidance on how best to move a digital service through the development stages of alpha¹ and beta² testing and into live operation³. The Service Manual also guides departments on how to

¹ <https://www.gov.uk/service-manual/agile-delivery/how-the-alpha-phase-works>

² <https://www.gov.uk/service-manual/agile-delivery/how-the-beta-phase-works>

³ <https://www.gov.uk/service-manual/agile-delivery/how-the-live-phase-works>

measure the success⁴ of a digital service once it is live. We encourage DWP to apply this guidance when developing and refining the Dashboards.

Question 2 – Do you have any comments on the proposed powers to disclose information?

The Panel does not have comments on the specifics of the proposed powers. However, we consider that consumer, pension scheme member and policyholder protection, safety and soundness should be the foundation stone of the Pensions Dashboard Programme (PDP) and the information disclosure arrangements should support these principles. The ecosystem should be designed and deployed to take a joined-up approach in identifying and taking every opportunity to protect consumers and their data, this to be a key benefit, aim and outcome of the PDP.

⁴ <https://www.gov.uk/service-manual/measuring-success>

Annex B - Financial Services Consumer Panel response to DWP's consultation on the draft Pensions Dashboards Regulations 2022

Financial Services Consumer Panel
AN INDEPENDENT VOICE FOR CONSUMERS OF FINANCIAL SERVICES

Telephone: 020 7066 9346

Email: enquiries@fs-cp.org.uk

10 March 2022

By email: pensionsdashboard@dwp.gov.uk

Dear Sir / Madam,

Financial Services Consumer Panel response to DWP's consultation on the draft Pensions Dashboards Regulations 2022.

The Financial Services Consumer Panel (the Panel) is an independent statutory body. We represent the interests of individual and small business consumers in the development of policy and regulation of financial services in the UK.

The Panel welcomes the opportunity to respond to the Government's consultation on Pensions Dashboards Regulation.

The Panel does not have any comment on the specific questions raised however would like to raise the points described below.

With the current financial climate, it is important that consumers understand their pensions and prepare for financial security in later life. The Pensions Dashboard is an opportunity to reunite individuals with lost pots and transform the way consumers think about and plan for their retirement.

According to the FCA Financial Lives publication, pension ownership was higher for men (62%) than women (54%), evidence shows that consumers have varying interactions with their pensions based on their gender, earnings and other factors. The Panel would encourage DWP to consider this in relation to access to the dashboard and focus on ensuring consistent access for all consumers, regardless of their status.

Whilst the Pension Dashboard can change consumer habits for the better, dashboards are only available through digital mediums. This raises questions around in-person interaction post implementation. Whilst some consumers may be able to access their Pension Dashboard online, this cannot be assumed for all consumers and it is important that the FCA are aware of this and monitor its effect on consumers who are unable to access their Dashboard due to access issues (no internet, device etc.). The Panel would encourage both DWP and the FCA to consider how best they can implement the Pensions Dashboard in such a way where charities and third parties can help people (such as those without digital access or vulnerable individuals) access their Dashboards.

The Panel would encourage DWP to look to other countries such as Sweden to see what they can learn and implement within the UK.

Alongside accessibility, the Panel believe that the Dashboard needs to be functional and deliver real consumer benefit to those who can access it. The Panel would be interested to hear what considerations around function and beneficial outcomes DWP has made for those unable to access a Pension Dashboard. Feedback from user testing will be particularly helpful in identifying where functionality can be improved.

The Panel note that the results of the user testing has not been published yet, the Panel would be interested in the results and would like to understand how they will inform DWP's work and what changes are being planned because of the testing

Whilst the Panel are more consumer focused, there is still a need to ensure that industry requirements are also fairly considered so that it is feasible for firms to implement these and they do not pass on increased costs to consumers.

Finally, the Panel would like to thank DWP for the opportunity to respond to this consultation.

Yours sincerely,

Wanda Goldwag

Chair, Financial Services Consumer Panel