To be submitted via online form

16 February 2023

SPP response to PDP Pensions dashboards design standards consultation

Design standards: consultation

Our aim is for qualifying pensions dashboards services (QPDS) to be engaging, inclusive and accessible.

Q 1 Do our proposals achieve this aim?

Yes.

Q 2 If not - what more do you think we could do?

We agree with the proposal. Allowing operators some flexibility around the "look and feel" and, potentially, how information is presented will be positive. We understand that the aim is to meet the needs of consumers and providers, and a proper balance would be achieved within the proposed framework. However, we would like to note that excess flexibility could confuse users or lead to a lack of consistency amongst different dashboards (although the basic information should be the same).

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.

Q 3 Do you agree our approach strikes the right balance?

Yes.

Q 4 Do you have suggestions about what more we could do to strike the right balance?

The standards do not clarify how a potential user or a third party can verify that the Dashboard service is authorised and legitimate. We think this is key as the lack of clarity on authorised dashboard providers could be a space for potential scams, spoofing, and personal data leaks to unauthorised third parties.

On that note, an official website with a public list or register, including a link to the QPDS provider's official website and a list of authorised third-party apps or websites linked to them, could be a

solution to address the related issues, including the FCA registration plus a way to check on FCA's website. Another option is to establish a specific requirement for QPDS to display the information about the registered authorisation (i.e., an FCA register number and a link to confirm that information, not just a warning for users to check the FCA register as indicated in the FCA consultation), and the permission to operate the service. Both options, although not completely bulletproof would reduce risks and should not be difficult to apply for a limited initial group of QPDS.

The answer also depends on who will be responsible for advertising dashboard services. If advertising relies entirely on administrators, then there is a potential big gap that needs to be filled. As people move into different occupational schemes throughout their active working life, it is expected that many individuals are not in contact with their pension's administrators and, therefore, their personal information (e.g., address, contact number) is not up to date and/or individuals are do not know the administrator of their benefit(s) (e.g., this could lead to mistrust of communication(s) from "unknown" sources). If the policy aim is to increase awareness of and accessibility to pension information, further clarification is needed on how the policy will address these practical concerns. Moreover, it would be important to have clarification on the policy intent on advertising and how potential scams or spoofing or other types of deceiving, will be prevented.

All in all, it would be necessary to have a clear general approach to prevent scams or similar situations, as it is reasonable to expect that some users will not check or have a full understanding of the information. On a related note, and considering that both consultations are linked, in the FCA consultation on Dashboard Standards, there is a section (e.g., 5.138 and onwards) on personal data scams, and the measure is that the FCA will protect users and actively look for an illegitimate website. It would be advisable to have PDP's view on how the proposed standards will contribute to this.

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.

Q 5 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).

Yes.

Q 6 Do you have any further comments on this question?

No further comments.

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).

Q 7 Do you agree with this approach to ensuring accessibility?

Yes.

Q 8 If no - then what other approach do you think we should adopt to ensure dashboards are accessible?

We agree to use an existing standard.

We have explained what we mean by dashboards being inclusive (see paragraph 25(b)(ii) of the draft standards).

Q 9 Do you think we need to provide more explanation?

No.

Q 10 Do you have any further comments on this question?

No.

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.

Q 11 Do you think this is right the right approach?

No.

Q 12 If no - then how do suggest we should approach defining terminology?

Terminology is quite subjective and depends on the information provided by the scheme. Leaving schemes to communicate could be a sensible approach. There is a concern that, due to the lack of common terminology, a potential lack of consistency across providers in how pension information is described could appear.

However, we understand that defining concepts could lead to creating a completely new glossary, which could be difficult and not suitable for all schemes. In that sense, we think it would be important to ensure that providers preserve the consistency between the information provided by the scheme and how it is displayed to the user.

Q 13 Are you clear what this means in the light of the explanation in paragraph 39 of the draft design standards?

Yes.

Q 14 How do you think we could clearer in explaining what we mean?

We think this would be for user testing to decide and if the information, as displayed, looks "logic" and "neutral". There is a judgment element for the provider, and as long as they present the information provided by the scheme in an appropriate way, it should be fine. However, there could be problems if providers try to adapt the information provided by the scheme, aimed at making it more "logical". It must be noted that the danger of not defining to what extent something is "logic" or "neutral" is that the meaning of both terms is pretty subjective. In that sense, although supportive of the approach and the proposal, we would welcome further clarification in paragraph 39.

In relation to the summary of pensions information on the QPDS:

Q 15 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?

Yes.

Q 16 If no - please explain what approach you would prefer.

We have concerns that any associated warnings shown with this view could confuse users and, therefore, suggest the warnings are detailed when the user clicks through to view the detailed pensions information. No further comments.

Q 17 Do you consider we are requiring the right amount of information to be displayed in the pensions summary?

Yes.

Q 18 If no - what information do you think we are missing or what information do you consider to be superfluous?

No further comments.

Q 19 Do you agree with the rules are proposing for how the summary is constructed?

Yes.

Q 20 If no - then can you explain why not and highlight any omissions you consider we have made.

No further comments.

Graphical representations of found pensions

Q 21 Do you think we should allow graphical representations of all the found pensions on QPDS (see paragraph 46 of the draft standards)?

Yes.

Q 22 If no - could you explain why?

We are supportive, as long as not misleading and neutral, aimed at making information more accessible. Also, it must have appropriate caveats and be displayed as an additional view option, not the only one.

Mandated explanation mitigations for graphical representations.

Q 23 Do you think the mandated explanation mitigations we have put in place for graphical representations are adequate?

Yes.

Q 24 Please explain what you would consider to be adequate mitigations.

No further comments. On a related note, it would be ideal to have an example of how a graphical representation in compliance with mitigations would look like or consider a user test to be sure that the standards meet the policy intention.

Links to the CDA displayed on each page.

Q 25 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.

Q 26 Do you have any further comments on this question?

The concept seems logical, but practicalities need to be considered of different device capabilities, like the size of the screen (e.g., some detail may not be visible on small screens or the mobile version of the website) or limitations of hardware (e.g., older devices could not be able to run the programme, and a lite version could be needed).

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.

Q 27 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)?

Yes.

Q 28 Do you have any further comments on this question?

We think that it might be relevant for the user to have an understanding of what delegation entails, even before they do grant access to a third party and regardless of the existence of delegation. As control over delegation is critical, it would be ideal to have a register of who (a third party) has access to the information.

Q 29 Please also feel free to submit any other comments you wish to make in respect of our proposed design standards.

A formal note: on page 12, right side, on "Dashboard display", the last bullet point has a double "may" on either side of the wording in brackets. Also, on the left side, the last three bullet points should be sub-bullets for the item above.

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