

SPP Response - PDP [Call for Input](#) on approach to identity verification

Submitted via online form, 16 March 2021

- 1. Do you agree that finding pensions and viewing pension details via a pensions dashboard should include a central digital identity, asserted to an appropriate standard, in accordance with the GPG 45? If no, what alternative approach would you recommend?**

Yes – we agree that a central digital identity in line with GPG 45 is a reasonable approach.

- 2. The proposal includes a level of confidence in identity and a level of authentication. Do you have a view on the level of assurance that needs to be achieved to provide comfort to release pension information? If Yes, what elements do you think are the primary factors? If No, what additional information would you need to be able to make an assessment?**

We consider that the Pensions Dashboard should operate with similar levels of confidence and assurance to those used by the Open Banking framework and the State Pension Forecast service.

- 3. The suggested levels of confidence (GPG 45) and authentication (GPG 44) are ‘medium’, which equates to the previous versions of the standard level of assurance two. Do you agree that this is the correct level? If No, what would you suggest is the correct assurance level for both proofing of identity and strength of authentication?**

Though we believe that the levels being proposed are appropriate, we would note that the term ‘medium’ may be perceived by those without a more detailed knowledge, as failing to meet expectations that pension data requires the ‘highest’ levels of security. It will therefore be important that the strength of the “medium” security being applied is made clear in communications.

- 4. Is there an alternative to the default levels of assurance from the Good Practice Guidelines and how would you anticipate them being measured?**

We do not have an alternative to suggest.

- 5. Does your firm have any view on proofing or authentication methods and operate a current internal standard that differs from the GPGs medium level? If Yes, could you please provide an overview that could help direct the programme’s approach?**

N.A. We are a professional body representing firms across the pensions industry and do not operate a standard in this way.

- 6. The architecture includes the central identity service to ensure that a uniform, controlled process exists, and that a user can easily manage their own consents. Please provide your thoughts on this approach and any challenges that you may foresee.**

We consider that it is vital that, whether there is eventually one dashboard or many, there is a consistent approach to verifying and authenticating identity. It is important that both pension schemes and dashboard users have full confidence that the approach ensures that data cannot be misused or accessed by the wrong person.

If, in due course, delegated access was to be permitted, for example to a user's financial adviser, then appropriate assurance will be needed on the robustness of the process to verify the identity of the delegate.

- 7. Are there any specific requirements that you would anticipate the Pensions Dashboards Programme having to meet when seeking: a. your firm's approval for a standard approach to identity assurance b. a cross industry agreement on a standard for identity assurance Identity approach**

a/ N.A.

b/ We understand from industry the expectation that all those with an interest, including providers, trustees and administrators, will require a clear understanding of the standard being applied, and also of any responsibilities they have. In particular they will want to understand the responsibility of the identity verification provider and where liability will fall if a failure of identity verification leads to data being disclosed to the wrong party.

We believe that industry would be supportive of the involvement of the Information Commissioner's Office in determining that the approach developed minimises the risk of data breaches.

- 8. What security related controls (other than identity proofing and authentication) do you see as important in your acceptance of the PDP solution for Pensions Dashboards?**

We believe that consideration should be given to carrying out some degree of passive screening (e.g. checking whether a death has been registered for the individual) whenever a user logs into a dashboard.