



Financial Data and Technology Association

Financial Data and Technology Association
c/o The University of Edinburgh
13-15 South College Street
Edinburgh
EH8 9AA

August 2020

Sent via Email to: infopdp@maps.org.uk

FDATA Europe Response to Pension Dashboards Programme (PDP) Call for Input
(https://www.pensionsdashboardsprogramme.org.uk/2020/07/06/data-standards-call-for-input/)

Table with 2 columns: Question/Field and Answer. Row 1: Forward: The Financial Data and Technology Association (FDATA Europe), on behalf of its members, is grateful for the opportunity to provide comments on the Pension Dashboards Programme Call for Input. Row 2: 1: Name: Ghela Boskovich. Row 3: 2: Organisation: Financial Data & Technology Association (FDATA). Row 4: 3: Email: ghela.boskovich@fdata.global. Row 5: 4: Are you happy for your responses to be made public? Y/N: Yes. Row 6: 5: Existing user research indicates that people have a low tolerance for incomplete dashboards and would rather wait until the majority of pension providers and schemes are 'online'. To be acceptable to individuals, what proportion of their pension entitlements: FDATA would defer to conclusions drawn from customer protection and advocacy groups research into this particular matter. As mentioned in the Pensions Dashboard Research project by 2CV in 2017, incompleteness makes little sense. It seems a minimum requirement would be for all the major providers as well as the State Pension should be included in the initial dashboard launch. If dashboard utility is neutral at 75% completion, and shows an uptick in efficacy and utility at 80% or 95% comprehensive data, we would recommend awaiting the launch of the dashboard until that minimum utility threshold is met. However, given the initial promise of providing aggregated

Company number: 09132280
Registered Office: Regent House, 316 Beulah Hill, London SE19 3HF
Correspondence address: c/o The University of Edinburgh, 13-15 South College Street, Edinburgh EH8 9AA

<p>should initial dashboards find? Please indicate any consumer or other research used in framing your response to this question.</p>	<p>pension data back in 2004, it makes no sense to lose any more time in bringing a pension finding dashboard to market even if it is not comprehensive. A proper consumer education campaign can provide context as to why the dashboard is non-comprehensive; provide a timeline as to when certain thresholds are expected to be available; and familiarise consumers with their options, retirement needs, advice for savings and planning, in preparation for a more complete aggregation of pension data.</p> <p>Dashboard utility is not entirely dependent upon having all pension data available or pooled. No time should be wasted waiting for pension providers to make that data available before consumer education and support is provided.</p>
<p>6: How long (i.e. how many months?) will most individuals find acceptable between first using a pensions dashboard (and finding only some of their pensions) and subsequently finding out that more of their pensions are now available to view?</p>	<p>FDATA does not have research indicating an acceptable timeline, however based on our members' provision of open banking/open finance solutions, they do have a regular cadence for pushing out updates and improvements to their apps and solutions.</p> <p>Moreover, based on current regulation that requires a reauthorisation of those services every 90 days, it makes sense for customers to expect re-engagement or updates at the same cadence.</p> <p>Bank statements are also produced quarterly, every 90 days.</p> <p>Regular engagement with consumers creates an expectation for updates within a given timeframe, and encourages better engagement behaviour.</p> <p>If consumers were to receive notification every 90 days informing them of additions to the dashboard, it encourages them to log in to check on possible updates to their particular dashboard.</p> <p>Mimicking the same update cadence they expect from their other financial service providers increases the chances that they will engage more frequently with their pensions and retirement services as well.</p>
<p>7: Are there any segments of the population for whom the majority of their pensions could be</p>	<p>FDATA proposes that it is not a matter of population segments, but provider readiness that matters in expediting delivery of the dashboard.</p> <p>We would reframe the question: are there types of pension providers/scheme types that are more ready than others?</p>

<p>covered early by selecting a subset of pension provider/scheme types?</p>	<p>The ability to provide data on request using straight through processing is all that is required of providers. Using standardised APIs to feed into the dashboard should be relatively simple for those providers using an open data architecture.</p> <p>Most workplace pension providers already provide such interfaces with third parties - typically payroll - for the straight through processing of contributions under auto-enrolment. Extending the scope of requests for data, to find members and details of their holdings is not a great challenge to a provider with open data architecture.</p> <p>Many other pension schemes will be able to be early adopters. Government should consider granting early adopters specific privileges as being "dashboard-ready". This kite mark should be a badge of honour for third party administrators, in-house pension administrators and for insurance companies.</p> <p>We appreciate that many such organisations may be partially ready, being able to meet the requirements for part of their book immediately. FDATA hopes the Government encourages such organisations to give access to part of their books as early as possible and not to have to wait in turn.</p> <p>Again, it is not a matter of which population subset would have the most access to their data, but rather which providers are data-sharing ready.</p>
<p>8: If you have identified one or more population segments in response to Question 7, what simple, cost effective communication approach(es) could be adopted to explain to <i>all</i> individuals (both within and outside of the specified segment(s)) which pensions they should and should not expect be able to view on initial dashboards?</p>	<p>FDATA submits that this is not the most useful question; why pre-determine population segments before knowing what data is most readily available?</p> <p>Data availability and provider readiness would prove a more informed approach in terms of rolling out the dashboard, as well as crafting consumer communication and education execution plans.</p> <p>Once data availability (and timeline to availability) is determined, it provides the order of priority as to which population segments will have access to their pension data via the dashboard.</p> <p>Rather than wait until the magic tipping point for data comprehensiveness is reached for a particular segment, which only further delays dashboard delivery, this approach allows those providers who are ready to provide data at speed. It also provides a view on which providers (who may focus on a</p>

	<p>specific segmentation) will need to be compelled or cajoled into providing APIs to expedite the dashboard delivery timeline.</p>
<p>9: Which data items do you anticipate could be used to definitively match individuals to their pension entitlements? Of the data items listed, are there some (or some combinations) that will provide a more accurate match than others?</p>	<p>FDATA submits that the fewest data points needed to confirm a match accurately should be the standard, especially in order to maintain privacy.</p> <p>FDATA supports deferring to the advice of data scientists on the minimum number, and which data fields, would provide an accurate match.</p> <p>We do support standards for data syntax and format; and we recognise that a number of pension providers may not have their data sets cleaned to a necessary standard. We assume that those providers are also not API ready, and therefore would be required to update their architecture as well as clean their data sets in order to be dashboard ready.</p>
<p>10: In Level 1b, we have set out the administrative data items that will be useful to individuals, as these items will enable them to see where their pension entitlements are. Which of these items would be most challenging for pension providers and schemes to supply? Please indicate in your response why this would be the case. (Employer data being applicable only to workplace pensions)</p>	<p>FATA does not have a view on this matter.</p>
<p>11: One of the DWP design principles is that dashboards will initially be used for presentation purposes</p>	<p>FDATA agrees that the most straightforward and simple ERI data for each pension should be displayed, for the initial version of the dashboard.</p> <p>However, we do recommend the dashboard eventually incorporate an aggregated view of all pension ERI combined for</p>

<p>only (i.e. they will not alter the source data). This means that initial dashboards cannot calculate projected pensions, meaning that pension providers/schemes must supply an Estimated Retirement Income (ERI) for each pension. This includes situations where there are multiple "tranches" within a pension, i.e. multiple ERIs with multiple Payable Dates may need to be supplied. The Level 2a data table sets out our assumptions on the simplest way for pension providers/schemes to meet this requirement. Please comment on these assumptions.</p>	<p>a consolidated view. This will have more utility as people are encouraged to understand their holistic view of retirement finances and requirements. It also reduces errors consumers may make as they manually add their pensions ERI; automated consolidation improves accuracy, and provides a true timeline as to pension maturity and any fluctuations that may cause to actual pension payout.</p>
<p>12: Are there any "disclosure items" (i.e. items required under current disclosure regulations) that are currently challenging to supply digitally? If so, please indicate how many months it would take to make these "disclosure items" available digitally?</p>	<p>FATA does not have a view on this matter.</p>

<p>13: Most data items in level 3 are not currently required to be made available to individuals under the current disclosure regulations. Would any of these (or other) areas of data be able to be supplied voluntarily for initial dashboards?</p>	<p>FDATA assumes that all data can be shared if the consumer grants permission for it to be shared. Under GDPR it is the consumer's data, the provider is the custodian of that data and must follow the directions from the consumer if the consumer decides to share that data with another regulated actor.</p> <p>Given that the dashboard governance requires a trust/verify framework for those participating in it, this trust framework ensures that any customer directed data is limited to sharing amongst regulated actors including the providers, the dashboard, and any third-party providers who play part in the trust framework.</p> <p>Under this guise, if use of the consumer grants consent via the dashboard for that data to be displayed or shared, it is not a matter of the pension provider voluntarily supplying that information; it is a matter of them being compelled under law to share that data as directed by the consumer.</p> <p>Therefore, Level 3 data items should not be considered 'voluntary'; they should be considered mandatory if the consumer decides to share that data. This is a matter of design, data readiness at the provider level, and functionality of the dashboard. Whether or not Level 3 data items are supplied in the initial dashboard is a matter of customer data right more than anything else.</p>
---	---