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Pensions Dashboard Programme  
11 Belgrave Road  
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By email: [infopdp@maps.org.uk](mailto:infopdp@maps.org.uk)

Dear Sir / Madam,

**Financial Services Consumer Panel's (the Panel) Response to the Call for Input of the Pensions Dashboard Programme's (PDP) Working Group Papers**

The Financial Services Consumer Panel is an independent body established by statute to advise the Financial Conduct Authority (FCA). We represent the interests of individual and small business consumers in the development of policy and regulation of financial services in the UK.

We fully support the aims of the Pensions Dashboard and the aim of the PDP to create a consistent set of data standards that suits all types of pension entitlement. As the development of the Pensions Dashboard progresses we would like to draw your attention to the Panel's response to the DWP's Pension Dashboard Feasibility Report<sup>1</sup> which shares some of our wider concerns around data sharing and consumer consent, dashboard governance and the future of pension dashboards.

We have chosen to comment on the Data Scope Working Paper only. Please see our answers to the questions posed below which we are happy to be made public.

Yours faithfully

Wanda Goldwag  
Chair, Financial Services Consumer Panel

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<sup>1</sup> [https://www.fs-cp.org.uk/sites/default/files/fscp\\_dwp\\_pensions\\_dashboard\\_consultation\\_response\\_20190128\\_2.pdf](https://www.fs-cp.org.uk/sites/default/files/fscp_dwp_pensions_dashboard_consultation_response_20190128_2.pdf)

## Data Scope Working Paper Questions

- 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 should initial dashboards find? Please indicate any consumer or other research used in framing your response to this question.**

Complete dashboards are likely to be more critical for those closer to retirement age while those of a younger age are likely to be more accepting of an incomplete dashboard. Consideration of different sub-sectors of the population and their needs is therefore essential to delivering a viable dashboard that is acceptable to end users.

- 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?**

This question is most appropriately addressed through evidence such as the experiences from dashboards in other countries, and further behavioural research is welcomed which keeps the end user i.e. the consumer in mind.

- 7. Are there any segments of the population for whom the majority of their pensions could be covered early by selecting a subset of pension provider/scheme types?**

A decision that is informed by the willingness or current capability of pension providers/scheme types to supply data will not necessarily deliver the best outcomes for individuals. Different sub-sectors of the population will have differential levels of engagement and requirements. For example, those who are within 10 years of retiring may have a greater need for and make greater use of a dashboard than younger individuals; this may in turn provide better quality feedback for future dashboard developments.

- 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 all 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?**

No comment.