Reset complete: Time for dashboard delivery?

> **Has the 'reset' of the pensions dashboards project, announced in March 2023, offered a valuable chance to review and refine projects, or has it killed the momentum behind the project? David Adams asks if the dash to build dashboards is about to resume**

> **Summary**
> • The 'reset' of the dashboards programme timetable should have some beneficial effects, but has slowed momentum.
> • A new timeline for connection dates will be published in DWP guidance during 2024, leading up to a legally binding final connection deadline of 31 October 2026.
> • This year should also see the release of data, technical and design standards for dashboards, further details on how regulators will enforce dashboard requirements; and the start of detailed planning for user testing.
> • There may be capacity constraints likely to affect availability of technical expertise in the years leading up to 2026.

A delay to a project overseen by the UK government is probably less surprising than news of such a project being completed on time. But while the 'reset' of the development of pensions dashboards, announced in March 2023, caused great frustration in some parts of the industry, it was greeted by sighs of relief elsewhere.

Building the dashboards ecosystem is difficult because it is so complex. It requires input from parties including the Department for Work and Pensions (DWP), both the Financial Conduct Authority (FCA) and The Pensions Regulator (TPR), the data providers (trustees, managers and providers of thousands of DB and DC pension schemes, other pension vehicles and products), the integrated service providers (ISP) and administrators supporting those schemes, vehicles and pension providers, the government's MoneyHelper dashboard, provided by the Money and Pensions Service (Maps), plus the growing number of commercial dashboard providers; and the PDP itself, which will run the Central Digital Architecture (CDA) at the heart of the ecosystem.

The hope must be that the reset will help ensure each of those elements function properly. But inevitably the reset has also reduced the momentum that had been building ahead of the original initial connection deadline, which would have been in August 2023.

The new staging timeline will not be set out in legislation as before, but will instead be published in DWP guidance, based on industry consultation and expected to be published in Q1 2024. It will provide at least 12 months' notice before the first connection dates. A final connection deadline of 31 October 2026 has been set in amendment regulations by the DWP; and the government

and the PDP have suggested that the Dashboards Available Point (DAP), the moment when the dashboards are made available for public use, could be before the October 2026 deadline.

Meanwhile, the Pensions Dashboards Programme (PDP) has been consulting the pensions industry and technology experts on data, technical and design standards for dashboards. The data standards will be made available before the other new standards in 2024, which will also see the start of detailed planning for user testing that will follow the first connection dates.

In addition to resources TPR and the PDP have already provided, in December 2023, the Pensions Administration Standards Association (PASA) published Connection Ready Guidance for schemes working on dashboard projects. This is based around five key steps PASA says schemes must take now: Consulting TPR's Pensions Dashboard Checklist, engaging with administrators and suppliers, developing a detailed understanding of compliance requirements in relation to the scheme's operations, identifying gaps in its ability

to meet those requirements; and agreeing delivery plans.

Lost momentum
It is reasonable to suggest that a delay in refining all of these processes could enhance their final form, but it is also clear that, as ITM chief innovation officer, Maurice Titley, who is also co-chair of the dashboards working group at PASA, says, the reset was "a point where momentum was lost".

Mercer actuary and principal, Mark Woodward, believes many larger pension schemes have continued to make good progress on dashboards projects throughout 2023, but other schemes have put work towards dashboards on the back burner. PDP principal, Chris Curry, is keen to portray the reset as a chance to improve the effectiveness of the dashboards programme and projects across the industry.

"We know there were parts of the industry that were struggling with the initial timeline, so it's been an opportunity for them to catch up," he says. "Although [schemes] want to know when they can connect, there's a lot of work that can be done without that connection date, so when we do have those new timelines people will be ready."

The regulatory regime that the FCA and TPR will enforce to ensure schemes and providers comply with the new timeline and other dashboards programme requirements has not been finalised. But even before regulatory enforcement, once the new connection timeline has been published it will be clear that many schemes will need to have completed dashboard projects well before October 2026, says Titley.

But he stresses the need for more details about exactly what each scheme must do. "There is a need for details on the next level down, to show how long it is likely to take an average scheme to complete the work required," he says.

One aspect of this work being high-lighted by TPR is the challenge schemes and administrators face in preparing data for use in the dashboards.

In October 2023, TPR launched a campaign to promote the need to prepare this data, stressing the amount of time that may be needed to clean data so it can be used to match pension pots with their owners. Many schemes will also need to make pension calculations in real time, which some have never needed to do before.

Dashboards and other technology providers continue to refine products and services, even before the full list of technical, design, regulatory and timeline requirements with which they will need to comply has been finalised.

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Dashboard provider Moneyhub is enabling pension providers to connect to its Replica CDA for sandbox exercises in advance of the completion of the real CDA.

Moneyhub CEO, Samantha Seaton, says there is also a lot of activity underway involving pension providers beginning user testing. "We get to see some of that user testing … and [end users] are always delighted and a bit surprised that they can see all their pensions in one place," she says. She also reports new players entering the market. She says she can't name them at present, but that they include companies that "I don't think the industry would expect to be pensions dashboard providers" – another potentially promising sign for the future.

2024: A year of action
Schemes, administrators, dashboard and other technology providers will all need to contribute to the effort to complete dashboard projects on time, says Titley. But he suggests that one key challenge is likely to be capacity constraints across the industry due to demand for administrators and other service providers from every scheme or provider approaching connection deadlines.

Woodward agrees. "The key message we're putting to our clients is that it's crucial to start now," he says. "Don't rely on your administrators. Be proactive. Start planning now and avoid a mad scramble in 2026."

In the longer term, Seaton has high hopes for the technical capabilities that dashboard providers will make available to schemes, providers and consumers over the years ahead. "The UK will be the only country in the world to offer multiple dashboards and that means you are creating innovation," she says.

Curry believes the dashboards will also complement other improvements made to the UK pensions system in future, such as the pot for life concept. "Pot for life is likely to be quite a long way into the future, but if people want to do that consolidation they will need to know where their pensions are," he says. "We see the dashboard as a complement to that sort of activity." ISP Bravura Solutions' principal business consultant, Jon Hawkins, says the reset has been "frustrating", but that the industry needs to be ready for the next phase of the programme.

"We're just waiting for the updated standards and operational protocols, then we'll be ready to go," he says. "If 2023 was the year of the pause, 2024 has to be the year of action. The dashboard projects and programme will be part of the new pensions system, alongside the pot for life and consolidation of small pots. This is the first part of that new pensions infrastructure. It's really exciting – but we need to get on with it."

Written by David Adams, a freelance journalist