



# Pensions Dashboards: Working together for the consumer

## Consultation Response

We are advocates, thought-leaders and champions for the Pensions Dashboard. We have a passion and absolute commitment to deliver for the consumer and have spent 4 years working with industry and Government to bring a solution to an advanced state of readiness. We welcome Government's commitment and are delighted to respond favourably to the consultation.

January 2019



ORIGO

[www.origo.com](http://www.origo.com)

# Contents

---

## Table of Contents

Introduction .....	3
Executive Summary .....	5
Consultation Responses .....	6
Contact Details.....	19

# Introduction

---

Origo is one of the UK's leading FinTech businesses, an organisation with a not-for-profit ethos owned by and operating at the heart of the UK Pensions Industry. We are pleased to have supported the Pensions Dashboard initiative from its inception, including the Pensions Dashboard Prototype Project. We continue our support by investing in our solution on behalf of UK consumers, responding to the Department for Work & Pensions consultation and providing a series of briefing papers, including this one. We are passionate advocates of the Dashboard's founding principle: increased consumer engagement with all of their pension pots.

We are industry thought-leaders on this topic. Our vital role in the pensions industry, experience of delivering mission-critical industry services and significant sustained investment over 4 years to deliver the Pensions Dashboard uniquely positions us to provide input to DWP's consultation into delivering Pensions Dashboards<sup>1</sup>.

Our Pensions Dashboard Project Working Group was established in 2015 and helps us define requirements and review solutions. We have worked closely with over 40 of the UK's Pensions Providers in our Project Working Group, and 14 of these have volunteered to be part of our Technical Design Authority for the Pension Finder Service (PFS). Industry trade bodies, consumer bodies and Government stakeholders also contribute to the Project Working Group. We have reviewed our response to DWP with these industry organisations to provide a comprehensive industry view and we have shared our response widely with stakeholders and highlighted the key points via our media channels.

We have demonstrated a total commitment and ability to deliver the Pension Finder Service component of the architecture. This has been developed in line with the DWP stated requirements and refined during the Government, industry and Open Identity Exchange projects of the last 4 years.

We bring a unique skill set of Pensions and IT experts. Our solution is at an advanced state of readiness and fully meets the indicative requirements of the DWP. We have taken significant steps to de-risk delivery and stand ready to finalise our solution which is:

1. **Collaborative** - The Pensions Dashboard requires significant Pensions Industry input. As Origo is both owned by and works in partnership with the industry we meet this requirement. Our existing services are mission-critical to the Pensions Industry and we have an excellent track record of providing innovative and robust services: Our Unipass service is the industry authentication standard for Financial Advisers; our Origo Transfer Service is used by 100+ pension companies. Our Pensions Dashboard Project Working Group was established in 2015 and comprises over 40 organisations, who have helped us define requirements and stand ready to acceptance test a finalised solution.
2. **Innovative** - We have already demonstrated our capability through the OIX "Pension Finder Alpha project", the Pensions Dashboard Prototype Project, the OIX "Digital ID for Pensions Dashboards" project and our own developments which have been shared with the industry. The Origo solution is built upon a

---

<sup>1</sup> <https://www.gov.uk/government/consultations/pensions-dashboards-feasibility-report-and-consultation>

world class integration platform and market leading security technology that emphasises strong messages of quality, ability to scale and modern innovation.

3. **Robust & Ready** - Origo has continued to invest in and develop its Pension Finder Service, meaning that it is viable, robust and cost-effective in meeting the indicative requirements of DWP and the Pensions Industry. Our solution has been scale tested for 15 million consumers and is future-proofed e.g. the UMA-based Delegated Authority capability allows consumers to share their dashboard with Advisers or with staff at the Single Financial Guidance Body. We stand ready to provide a production-ready solution to meet the Government's timetable with service starting in 2019.
4. **Cost Effective** - Despite the complex nature of the UK Pensions landscape, our investment gives us confidence that with the estimated target of consumer adoption, the central components of the architecture can be provided at a lesser cost on a per-citizen basis than in other European countries that have implemented a Pensions Dashboard.

The UK has an opportunity to deliver a **world-leading** Pensions Dashboard architecture that will enable consumers to access their pensions data and at the same time control who can get access to this data. Combining assured citizen and delegate digital identity with modern open-standards based Application Programming Interfaces (APIs) and open security standards paves the way for a solution without parallel. No other country operating Pensions Dashboards has implemented such advanced citizen-centred functionality.

We are keen to hold further discussions with industry and Government to progress this critical project, in line with the commitment to launch in 2019.

# Executive Summary

---

Origo is delighted with the contents of DWP's report: "*Pensions dashboards: Working together for the consumer*". The recommendations are consistent with the detailed policy and technical submissions that Origo has input to DWP and that we have discussed with our Project Working Group, with other stakeholders and that we have promoted in our press releases, white papers and public commentary.

Based on our extensive experience **we agree with the Government that there should be a single Pension Finder Service which is run on a non-profit basis**. This view has been supported, refined and challenged by industry projects spanning 4 years and represents a secure and cost-effective operational model which is in the best interests of both the consumer and industry.

**We agree with the proposed architectural elements and overall design principles.** The architecture proposed, including a single utility Pension Finder Service, has the following characteristics and benefits:

- enabler for competition and innovation;
- alignment with Government and industry security requirements;
- advanced consumer consent and delegated access controls;
- cost-effective approach in the best interests of consumers;
- incorporates learning from other countries and from UK Open Banking;
- pragmatic approach to onboarding to meet 2019 timescales.

**Origo has already proven and demonstrated a solution meeting the DWP's core design principles:**

- puts the individual at the heart of the process by giving people access to clear information in one place online;
- ensure individuals' data is secure, accurate and simple to understand – minimising risks to the user and the potential for confusion; and
- ensures the individual is always in control over who has access to their data.

This should provide confidence to industry that the proposed architecture is feasible.

We are fully confident that our Pension Finder Service, central Authorisation Server and other core components are ready to provide the key "plumbing" to meet a 2019 launch. This will help to minimise the onboarding effort throughout industry so that robust services can be established to deliver consumer benefit in a timely fashion.

A robust and fully scalable infrastructure is required to underpin the service. With our experience in collaborating to provide reliable cross-industry shared services, we have established a trusted reputation for delivering mission-critical services at scale. Based on work **which has already been completed** we are certain our solution can support a population-scale service connecting millions of people (with corresponding verified digital identities) to their pension pots in a robust and secure service.

# Consultation Responses

## Wider Benefits

No	Item
<b>I a</b>	<p><b>What are the potential costs and benefits of dashboards for: a) individuals or members?</b></p> <p>Ideally, there should be no direct cost for scheme members or individuals. This will encourage maximum engagement and benefit for consumers, assist them with their financial planning and help to reunite them with lost pension pots.</p> <p>Individuals will benefit from a simple, aggregated view of their complete pension holdings, the ability to easily start the advice or guidance process and ultimately to have more engagement with their long-term savings thereby promoting informed consumer financial planning.</p> <p>In time, other significant benefits can be achieved - there are numerous opportunities to enhance the offering and improve consumer outcomes. However, for launch the key objectives of “what have I got, where is it and what do I do next?” should be the absolute focus and priority.</p>
<b>I b</b>	<p><b>What are the potential costs and benefits of dashboards for: b) your business (or different elements within it)?</b></p> <p>From an industry perspective there will be a direct cost to providers, schemes and administrators to ensure their data, systems and processes are “dashboard ready” i.e. able to respond to the Dashboard Open APIs.</p> <p>The initiative will provide a timely opportunity to adopt best-practice digital processes and increase engagement with members. This should lead to more efficient and cost-effective business practices and methodologies and more streamlined customer experiences.</p> <p>When the Pensions Dashboards ambitions are realised, consumers will be encouraged to save more, ultimately leading to increased pensions investment which will benefit the industry.</p> <p>The most cost-effective model is a single infrastructure that will support multiple dashboards to minimise the time and cost of getting the ‘plumbing’ in place and then delivering ongoing value and innovation for consumers.</p>

## Architecture, Data and Security

No	Item
<b>II a</b>	<p><b>Do you agree with: a) our key findings on our proposed architectural elements</b></p> <p>Yes – we fully support the proposed architecture.</p> <p>The model of a lightweight central Pension Finder Service has been challenged, refined and supported by industry projects spanning 4 years. We support DWP’s view that there should be a single utility service governed by a Pensions Dashboard Implementation Entity. Our ongoing engagement with Pension Providers and Administrators shows that they share this preference for a cost-effective operational model.</p> <p>The architecture proposed, including a single utility Pension Finder Service, has the following characteristics and benefits.</p> <p><b>Enabler for competition and innovation</b></p> <p>Industry requires a Pension Finder Service to provide true utility features (where duplication serves no purpose except to increase cost and complexity) and for this to be separated into a centrally procured delivery. This will allow for a consistent, cost-effective and timely delivery of the core infrastructure: ‘the plumbing’. This fully supports delivering ongoing innovation and competition across all areas of FinTech to provide the end consumer dashboard experiences and help Pension Providers with the challenges of integration.</p> <p>For Pension Providers, this means that their investment can focus on dashboards, data and consumer products that address market needs and to drive their business rather than on duplicating time and costs on underlying central infrastructure.</p> <p>A single Pension Finder Service provides a coherent platform and removes much of the complexity for dashboards and Integrated Service Providers (ISPs). This lowers the barrier to entry for technology companies to innovate at the Dashboard and at the ISP layers in an open, competitive, low cost market.</p> <p>A Pension Finder Service must be able to operate at scale, with capability to support hundreds, potentially thousands, of transactions per second. As an enabler, it may also be required to implement design patterns that enable API throttling techniques (traffic management) for “Find” requests and responses. This will be determined by industry Service Level Agreements which could be either pre-defined or configurable for each Pension Provider or ISP.</p> <p><b>Alignment with Government and industry security requirements</b></p> <p>The proposed architecture is designed with the consumer experience and security at its heart, whilst addressing the cost of provision, assurance and taking privacy-by-design and security-by-design principles into account.</p>

No	Item
	<p>The single Pension Finder Service will operate as a trust anchor by ensuring that a valid consumer identity assertion is required before orchestrating an industry-wide search for the consumer's pensions. Pension Providers and ISPs trust the messages coming from the Pension Finder Service without having to re-authenticate the consumer's identity. This improves the consumer experience and avoids the need to duplicate security development costs at the Pension Providers and ISPs while helping to meet the specific security and assurance requirements of Government and industry.</p> <p>Operating as a well-governed central utility service, where all security efforts are focused, means that the opportunity of security attacks on the industry is minimised. It also helps to minimise the security attack threat vector. Without a trust anchor, great cost, complexity and security risk is added across hundreds of organisations.</p> <p><b>Advanced consumer consent and delegated access controls</b></p> <p>Based on the proposed DWP architecture, previous projects have already proven a sophisticated approach which enables a consumer to securely delegate access to their pensions data to regulated financial advisers and guiders working for the new Single Financial Guidance Body.</p> <p>The architecture facilitates delegation for the purposes of guidance and advice using an approach based on centralised consent management. This also enables consumers to access all their pensions data and at the same time have explicit control over who can get access to this data. Such access can be made timebound and is capable of being changed or revoked by the consumer. This approach to consent allows for complete transparency, lowers the overall cost of service provision (as consent capture does not have to be replicated by participants in the architecture) and will help lower the cost of advice.</p> <p><b>A cost-effective approach in the best interests of consumers</b></p> <p>The proposed architecture is in the best interests of UK consumers due to the innovation it will enable while ensuring strong protections and controls. The overall cost of delivering the initiative is also minimised by not replicating core infrastructure elements for every participant. Ensuring efficiency is to the absolute benefit of consumers.</p> <p>A single utility service represents the most cost-effective and least-risk approach for a fully functional robust, service to be launched by the end of 2019. Such an approach has been well proven in all previous Dashboard projects including the Pensions Dashboard Prototype Project and the Open Identity Exchange project "Digital ID for Pensions Dashboards". These existing competitive evaluations have encouraged innovation resulting in a DWP and Government Digital Service approved design pattern for attribute exchange of State Pension data which is robust, efficient, innovative and economical. This will support the rapid progression of the PFS infrastructure element of the Pensions Dashboard. A single Pension Finder Service delivers a robust and reliable utility service provided with a not-for-profit ethos. Competition would not drive down costs on this element as they are largely fixed.</p>

No	Item
	<p><b>Learning from other countries and from UK Open Banking</b></p> <p>The proposed architecture has fully considered the experience from other countries and from UK Open Banking. It enables and provides for an innovative landscape of “Open Pensions”, specifically for the scale and complexity of the UK market.</p> <p>These findings confirm that the innovation and value realised by the consumer is in having an easy to understand view of their data and is of most benefit when full coverage of pension schemes is available.</p> <p>The research from all other countries endorses the architectural approach of a single, secure, centralised infrastructure. No other country has multiple Pension Finder Services or duplicated central utilities. This conclusion has also been endorsed by all previous feasibility studies by the Pension Finder Alpha Project, Pensions Dashboard Prototype Project (HMT/ABI) and by OIX and has informed DWP’s feasibility study recommendations.</p> <p><b>Pragmatic approach to onboarding to meet 2019 timescales</b></p> <p>A key consideration is the smooth on-boarding of Dashboards, ISPs and Pension Providers to meet the required timescales for delivery. The architecture supports a phased, well-controlled roll-out which will be essential for timely and successful delivery.</p>
<b>II b</b>	<p><b>Do you agree with: b) our proposed architectural design principles?</b></p> <p>Yes. The citizen is at the heart of the Pensions Dashboard. Their needs are supreme under GDPR and within Government.</p> <p>The design principles described in the Feasibility Study are citizen-centred and follow the primary principle of privacy-by-design. This leads to positive outcomes such as eliminating aggregation (a topical security concern). Citizen confidence in the security and integrity of the Pensions Dashboard will be key to its uptake.</p> <p>We have the following additional observations.</p> <p><b>Single Pension Finder Service</b></p> <p>The role of the single Pension Finder Service is central to the DWP’s target architecture. Some commentary in the public domain implies that the Pension Finder Service is a data aggregator. This is not the design specified by DWP which explicitly states that the Pension Finder Service is not a centralised data aggregator and it does not contain pension data. This is specifically to reduce the security threat.</p>

No	Item
	<p>The single Pension Finder Service can be implemented as a true utility with controlled and optimised costs. Importantly it also enables an open and competitive market for Integrated Service Providers (ISP) to emerge. It is at the ISP layer that the matching process and algorithms are applied. It would appear from some industry commentary that this is being confused with the role of the Pension Finder Service. Competition will not drive down costs on the Pension Finder Service element as they are largely fixed.</p> <p>We know from experience what a considerable undertaking it is to build a Pension Finder Service to act as a trust anchor, provide an authorisation service, integrate with digital identity providers and orchestrate the ‘Find’ process across the entire pensions industry. It requires highly complex software design, scalable infrastructure and significant investment. There is also a significant requirement to assure such a solution to the requirements of Government and industry for the protection of the consumer.</p> <p>To suggest that this type of function is easily implemented within individual dashboard technology is incorrect. Repeating functionality across multiple PFSs is inefficient, costly and would lead to greater complexity. This would delay the launch of the Dashboard initiative by at least 2 years negatively impacting on the pensions industry and citizens.</p> <p>We recommend that post-consultation DWP should provide more detailed information on the proposed architecture to provide more focus to further industry discussion and commentary. We have attached a supplementary document titled “<i>The Role of the Pension Finder Service</i>” which may help. This document has been created to:</p> <ul style="list-style-type: none"> <li>• Explain and summarise the role of the Pension Finder Service;</li> <li>• Compare and contrast various alternative options for its provision, as explored in previous industry projects;</li> <li>• Inform industry views to address the question of whether there should be a single Pension Finder Service.</li> </ul> <p>This document justifies the approach of a single Pension Finder Service and explains the merits of such a solution. This is consistent with industry consensus and recommendations made in previous phases of the Pensions Dashboard initiative.</p> <p><b>Principle (f) regarding dashboards use of data should be considered in more detail with the industry.</b></p> <p>We agree with the principle that there should be no aggregation or persistency of the data in the central components including the Pension Finder Service (although we would expect there to be security and audit logs persisted).</p> <p>We agree that the information presented on dashboard screens should be read-only and not used to alter source data. However, adviser software and D2C FinTech will want to use the dashboard data for wider purposes such as goal-based planning or financial advice. This will be essential as an enabler for lower cost advice and guidance for consumers.</p>

No	Item
	<p>We disagree that “data should not be persisted” in a front-end representation of Dashboard data – though this must be at the explicit consent of the user and not a default option. Without the ability to persist in the Dashboard presentation layer, then it will be difficult to innovate around the data and will reduce the likelihood of commercial Dashboards being able to deliver truly behaviour changing solutions. Preventing Dashboards from caching data may also lead to unintended consequences such as overloading the pensions industry with data requests.</p> <p>Provided all customer facing software is governed and regulated to use the Dashboard ecosystem, then we see no reason why data cannot be used beyond the initial dashboard ‘find and value’, providing that appropriate consumer consent is given, recorded and in accordance with EU GDPR.</p> <p><b>An Identity Scheme that provides appropriate assurance about the identity of users of Dashboards is viewed as a fundamental component of the solution.</b></p> <p>There is significant value in having a trust scheme (framework) that enables all data providers to search/match using consistent identity data that is both assured to an agreed level and has been approved by consumer privacy groups.</p> <p>Paragraph 147 of “Pensions Dashboards: working together for the consumer” states that Government expects identities used to access Pensions Dashboards to conform to the National Cyber Security Centre’s Good Practice Guide 45 (GPG 45) on ‘Identity Proofing and Verification of an Individual’.</p> <p>In addition to this, we anticipate the need for direct Government involvement in defining detailed requirements for consumer protection and access to state pension data.</p> <p>It is important that the Government provides early clarity and direction on the following areas so that the 2019 timescale can be met:</p> <ul style="list-style-type: none"> <li>• The specific selection process for a digital identity trust scheme (including the required technology) to support the Pensions Dashboard;</li> <li>• Government’s specific requirements for identity assurance including the specific level of assurance required under GPG45 for access to a consumer’s state pension data; and</li> <li>• How will selected/accredited identity providers be enabled to use the Government’s Document Checking Service (Passport Office and DVLA) should LOA2 identities be required by citizens in the private sector. Without this there will be a barrier to universal nationwide adoption and friction in consumer journeys.</li> </ul> <p>This information is required in order to meet the stated timetables, inform investment decisions and establish a successful private-sector identity ecosystem which will support Pension Dashboards.</p> <p>To ensure interoperability, the best experience for the consumer and to reduce overall cost and friction it would be helpful for Government to ensure the Dashboard identity solution is aligned to Government’s strategy for digital identity.</p>

No	Item
	Government, the Single Financial Guidance Body and the Pensions Industry need to quickly specify the required level of assurance for a consumer's identity and set up a trust scheme that has provider and Government backing. The level of assurance should be sufficiently high to allow confidence for data access and subsequently performing transactions in the fullness of time.

### Providing a complete picture

No	Item
III	<p><b>Is a legislative framework that compels pension providers to participate the best way to deliver dashboards within a reasonable timeframe?</b></p> <p>Yes.</p> <p>We would also recommend an accelerated timeline to build on the work that has already taken place in the industry over the past 4 years. This will allow the Pensions Dashboard to benefit from the momentum already in place with core components built and financial services providers who have already planned how to provide their data. Importantly, this will deliver early wins for the consumer.</p>
IV	<p><b>Do you agree that all Small Self-Administered Schemes (SSAS) and Executive Pension Plans (EPP) should be exempt from compulsion, although they should be allowed to participate on a voluntary basis?</b></p> <p>We think the Delivery Group under the Single Financial Guidance Body should determine scope.</p> <p>Thought should be given to how non-professionally run SSAS can be included in the regime of compulsion. This may include a role for professional trustees/administrators.</p> <p>However, with an ISP market being created we see no technological reason for exemption. The fundamental aim is for a consumer to have a view of all of their pensions in one place. The international experience showed that members want to see their full pensions data being available on a dashboard for all schemes which would include SSAS and EPP for a complete picture to be provided.</p>
V	<p><b>Are there other categories of pension scheme that should be made exempt, and if so, why?</b></p> <p>No.</p> <p>A comprehensive view for the consumer should not have exemptions.</p> <p>It should be noted that the overall design approach is flexible, future-proofed and supports a flexible and pragmatic approach to adopting the target architecture. Data items, pension scheme types and products can be added flexibly as required over time after the initial service launch.</p>

## Implementing Dashboards

No	Item
VI	<p><b>Our expectation is that schemes such as Master Trusts will be able to supply data from 2019/20. Is this achievable? Are other scheme types in a position to supply data in this timeframe?</b></p> <p>Yes, this is achievable. Additionally, there is no reason why this could not be widened to other providers that are ready in this timescale. As an example, Equiniti has recently announced their readiness and commitment to be ready for the first implementation and they would bring a significant book of Defined Benefit, Defined Contribution and public sector schemes to the first go-live phase.</p> <p>We recommend that the central components are procured quickly to allow schemes to onboard and meet the stated timescales.</p>
VII	<p><b>Do you agree that 3-4 years from the introduction of the first public facing dashboards is a reasonable timeframe for the majority of eligible schemes to be supplying their data to dashboards?</b></p> <p>We think the first phases should maximise participation and that the overall timetable for subsequent phases should be accelerated.</p> <p>As confirmed in the international research of the feasibility study, good consumer experience and increased take-up are maximised when all schemes are providing data so that the individual has a cohesive and complete view. The timelines should ensure that this happens and that the risk of early frustration is minimised.</p> <p>Whilst international dashboards took more time to achieve high coverage, they started with older technology and a single dashboard only approach. With advances in technology and the work already undertaken in the HMT/ABI and OIX projects preceding this feasibility study, the UK is well positioned to achieve a more efficient timeline both for launch and for onboarding data from all schemes to best serve UK consumers.</p>
VIII	<p><b>Are there certain types of information that should not be allowed to feature on dashboards in order to safeguard consumers? If so, why? Are there any other similar risks surrounding information or functionality that should be taken account of by government?</b></p> <p>An approach of minimising the data required at launch to concentrate on “what have I got and where is it?” is favoured by the majority of those who have participated in the feasibility studies over the past 4 years.</p> <p>The APIs, pension “resource model” and data standards can be extended over time (e.g. for fees and charges). This is consistent with a strategic direction towards “Open Pensions” and follows a similar approach to Open Banking.</p> <p>We agree that compulsion will be required to ensure that all schemes provide the specified minimum data required. Compulsion and professional governance of standards will ensure a</p>

No	Item
	<p>successful launch of the Pensions Dashboard and subsequently as coverage, and potentially data, evolves.</p>
IX	<p><b>Do you agree with a phased approach to building the dashboard service including, for example, that the project starts with a non-commercial dashboard and the service (information, functionality and multiple dashboards) is expanded over time?</b></p> <p>Yes.</p> <p>This is a practical and reasonable approach that will ensure the key “plumbing” features of the architecture are in place and tested with a key dashboard provider first.</p> <p>Starting with the non-commercial dashboard also allows delegation for guidance to be commenced which can easily be extended to regulated advisers as required.</p> <p>Consumer dashboards should be allowed to connect soon after the appropriate consumer protections and legal framework exist.</p> <p>The overall architecture is very flexible and supports one or more Dashboard services and does not differentiate between commercial and non-commercial offerings. This means that there is flexibility to meet any roll-out programme that the Delivery Group may decide upon.</p>
X	<p><b>Do you agree that there should be only one Pension Finder Service? If not, how would you describe an alternative approach, what would be the benefits and risks of this model and how would any risks be mitigated?</b></p> <p>Yes. The model of a lightweight, central Pension Finder Service has been challenged, refined and supported by industry projects spanning 4 years. We support DWP’s view that there should be a single utility service that meets all the design principles, will support Government and industry’s launch requirements and timelines as well as being governed by a Pensions Dashboard Implementation Entity.</p> <p>We have attached a supplementary document titled “<i>The Role of the Pension Finder Service</i>”. This document has been created to:</p> <ul style="list-style-type: none"> <li>• Explain and summarise the role of the Pension Finder Service;</li> <li>• Compare and contrast various alternative options for its provision, as explored in previous industry projects;</li> <li>• Inform industry views to address the question of whether there should be a single Pension Finder Service.</li> </ul> <p>This document justifies the approach of a single Pension Finder Service and explains the merits of such a solution. This is consistent with industry consensus and recommendations made in previous phases of the Pensions Dashboard initiative. Our ongoing engagement with Pension Providers and</p>

No	Item
	<p>Administrators confirms that they strongly share this preference for a cost-effective operational model.</p> <p>The single Pension Finder Service supports innovation and competition for both front-end Dashboard, FinTech and back-end integration services (Integration Service Providers, ISPs).</p> <p>The research from all other countries endorses the architectural approach of a single, secure, centralised infrastructure. No other country has multiple Pension Finder Services or duplicated central utilities or any stated desire to introduce them.</p>

## Protecting the consumer

No	Item
XI	<p><b>Our assumption is that information and functionality will be covered by existing regulation. Do you agree and if not, what are the additional activities that are not covered?</b></p> <p>Yes.</p> <p>There is scope for consumer education including the fact that they can control access to their data. The delegation approach should ease legal burdens and costs on providers when providing data to requesting parties.</p>

## Accessing Dashboard services

No	Item
XII	<p><b>Do people with protected characteristics, or any customers in vulnerable circumstances, have particular needs for accessing and using dashboard services that should be catered for?</b></p> <p>Yes.</p> <p>We have supplied a separate analysis paper "<i>Digital Inclusion for the Pensions Dashboard</i>". This quantifies likely access needs and makes recommendations on how this can be addressed to support maximum inclusion.</p> <p>The Pension Finder Service can be extended with a facility to allow trusted helpers (such as guiders working on behalf of the Single Financial Guidance Body) to deal with digital inclusion issues by initiating a search for pensions on behalf of consumers in vulnerable circumstances or with specific needs.</p>

## Governance

No	Item
<b>XIII</b>	<p><b>The department has proposed a governance structure which it believes will facilitate industry to develop and deliver a dashboard. Do you agree with this approach? If not, what, if anything, is missing or what workable alternative would you propose which meets the principles set out in this report?</b></p> <p>We agree with the proposed high-level structure for the delivery group and note the comparisons with the Open Banking model for governance. Previous work in Dashboard prototype phases, industry engagement over the past four years, and leveraging experience from the Open Banking Implementation Entity should encourage a dashboard governance approach that is lighter-weight than Open Banking. Open Banking governance has cost in excess of £26m thus far and has ongoing annual costs of £18m excluding internal bank and FinTech costs.</p> <p>The Pensions Dashboard project would benefit from a focused governance approach that delivers the plumbing in advance of compulsion and regulation activities. We recommend that the following workstreams are priority topics for the working groups to enable the essential plumbing to be in place for a 2019 delivery:</p> <ul style="list-style-type: none"> <li>• User Interface and design;</li> <li>• Technical architecture and standards;</li> <li>• Digital identity / trust scheme creation;</li> <li>• Regulation and legal framework; and</li> <li>• Ownership and funding framework.</li> </ul> <p>It is worth noting that within Open Banking, the only central components are a governance register (the Open Banking Directory), the Open Banking website and the Open Banking API/documentation portal.</p> <p>In contrast, for the Pensions Dashboard, in addition to a similar governance register, website and API/documentation portal it is anticipated that the Governance Delivery Group will be involved in selecting primary technology suppliers for:</p> <ul style="list-style-type: none"> <li>• The Single Financial Guidance Body dashboard;</li> <li>• A Pension Finder Service and Authorisation Server; and</li> <li>• The Identity Scheme that will be used for consumer and delegated access.</li> </ul> <p>These costs must be factored into the overall funding framework for the dashboard ecosystem. However, despite the complex nature of the UK Pensions landscape, our investment gives us confidence that with the estimated target of consumer adoption, the central components of the architecture can be provided at a lesser cost on a per-citizen basis than in other European countries that have adopted a Pensions Dashboard</p> <p>It will be important within the technical architecture and standards workstream to collaborate with Open Banking in areas such as: security profile, consent guidelines, use of open standards and encouraging standards setting bodies to collaborate. This will ensure that FinTech suppliers of</p>

No	Item
	dashboards will be able to easily integrate with the Pensions Dashboard architecture as well as Open Banking. These long-term synergies will benefit the consumer.

## Costs and funding

No	Item
<b>XIV</b>	<p><b>What is the fairest way of ensuring that those organisations who stand to gain most from dashboard services pay and what is the best mechanism for achieving this?</b></p> <p>We agree with this approach and that using the existing levy allocation is a fair way to start.</p> <p>The Single Financial Guidance Body should also consider the potential to charge dashboards for access.</p> <p>A new cost is Consumer Digital Identity. The commercial model for identity (including which entity in the ecosystem procures identities) should be a priority for the Delivery Group. This should consider an equitable, value-for-money approach.</p>

## General

No	Item
<b>XV</b>	<p><b>Do you have any other comments on the proposed delivery model and consumer offer?</b></p> <p><b>Momentum and achieving timescales</b></p> <p>DWP may wish to consider seconding the team which has progressed the work to this point into the Single Financial Guidance Body, to maintain momentum ahead of the Independent Chair being appointed and the Industry Delivery Group being fully set up to oversee this work.</p> <p>Technology components and suppliers should be selected quickly so that they can contribute to the relevant governance workstreams such as architecture and standards as well as support the onboarding requirements of a 2019 launch.</p> <p>The single Pension Finder Service architecture has been well proven, and solutions are at an advanced state of readiness. Building on this will achieve a robust and reliable utility service to meet the stated timescales.</p> <p>This infrastructure technology is a key enabler to:</p> <ul style="list-style-type: none"> <li>• Allow providers to focus on preparing their interfaces and data (become “Dashboard-ready”);</li> <li>• Establish a meaningful Dashboard service for UK consumers in 2019.</li> </ul>

No	Item
	<p data-bbox="169 499 1038 533"><b>Note on State Pension and National Insurance Number (NINO)</b></p> <p data-bbox="169 573 1453 707">We understand that most Pension Providers want to be able to use NINO as one of the key inputs to their data matching. The draft matching criteria produced on the Pensions Dashboard Prototype Project assumed that the Pension Providers would receive a validated NINO. The proposed minimum data set was explored in a paper produced in 2017. This suggested:</p> <ul data-bbox="268 748 903 958" style="list-style-type: none"> <li>• First name (Validated by IDP);</li> <li>• Surname (Validated by IDP);</li> <li>• Current address fields (Validated by IDP);</li> <li>• Previous address fields (Validated by IDP);</li> <li>• Date of birth (Validated by IDP);</li> <li>• National Insurance Number (Authenticated*).</li> </ul> <p data-bbox="169 1001 1433 1099">We understand that Government has ruled out a checking service that would validate NINO for a number of reasons. Furthermore, no private sector organisations (including the Identity Providers accredited by Government under the Verify scheme) can provide such a service.</p> <p data-bbox="169 1140 520 1173">This led to an approach of:</p> <ul data-bbox="268 1216 1442 1386" style="list-style-type: none"> <li>• The consumer self-asserting their NINO at the Dashboard;</li> <li>• The PFS orchestrating a search to the DWP for state pension before calling the rest of industry;</li> <li>• If the attempt to get state pension information was successful it could be assumed that the NINO was correct.</li> </ul> <p data-bbox="169 1429 1465 1594">There has been speculation that if the State Pension is not included at launch, then industry cannot hope to have validated NINOs for matching against. This may be a showstopper for some Pension Providers. It will be much harder to match pots without a validated NINO, although in theory a self-asserted NINO could be used in conjunction with other attributes if Pension Providers make a risk-based decision.</p>

# Contact Details

---

If you require any further information, please contact us:



Anthony Rafferty  
Managing Director  
07901 011 160  
Email: [Anthony.Rafferty@origo.com](mailto:Anthony.Rafferty@origo.com)



Michael Roe  
Development Director  
07990 587 406  
Email: [Michael.Roe@origo.com](mailto:Michael.Roe@origo.com)



Kenneth May  
Chief Architect  
0131 451 1152  
Email: [Kenneth.May@origo.com](mailto:Kenneth.May@origo.com)