

The UK insurance and long-term savings market and the ABI

The Association of British Insurers is the voice of the UK's world-leading insurance and long-term savings industry.

A productive and inclusive sector, our industry supports towns and cities across Britain in building back a balanced and innovative economy, employing over 350,000 individuals in high-skilled, lifelong careers, two-thirds of whom are outside of London. Our members manage investments of £1.6 trillion, pay over £17.2 billion in taxes to the Government and support communities and businesses across the UK by enabling trade, risk-taking, investment and innovation.

We are also a global success story, the largest sector in Europe and the fourth largest in the world. The ABI represents over 200 member companies, including most household names and specialist providers, giving peace of mind to customers across the UK.

Executive summary


The ABI continues to strongly support the pensions dashboards initiative as it has potential to be transformational in increasing customer engagement with pensions, which should lead ultimately to better customer outcomes. We are pleased to see that there will be multiple pensions dashboards and that this will be a regulated activity. By allowing multiple dashboards there will be scope to innovate to meet different customers' needs, and an increased reach meaning more users will benefit from dashboards, including post-view service proposals.

Dashboards need to be easy to interact with for them to meet their potential. However, the current proposals risk making this process clunky for the consumer. The paper states the proposals should empower the customer to make informed decisions, but the amount of confusing information, warnings and restrictions make it more likely to put the customer off making further decisions altogether.

With the number of prescriptive standards already in place, the FCA should consider whether these additions would be overkill and if they serve an additional purpose that is not already covered elsewhere. If the FCA is concerned about a certain type of behavior by firms, they should address that behaviour rather than limit the usefulness of dashboards.

It would be beneficial to see the FCA and PDP produce a high-level customer journey process map to represent the various steps and intended customer options throughout. Further to this, the FCA should work with the PDP to consumer test the end-to-end customer journey with variations of these warnings to ensure that customers do actually understand them, to check whether they add value and whether they are inserted at the right points. These changes should not be made without getting a sense of reactions from consumers and their likely behaviour. As a part of this, we would ask the FCA to consider whether there is an alternative option to including both the choices architecture and exit communications in the FCA regulations. For example, could these be included in PDP Guidance or Design Standards to enable them to be changed more readily once further testing and consumer input is received? This will have the same desired effect, whilst allowing for swifter revisions.

Allowing a PDS the choice as to whether to allow delegated access is sensible in the sense that this frees up different design choices. It is important for delivery partners to clarify if the MoneyHelper dashboard will offer delegated access; if it does not, it is entirely possible that this will not be supported by any dashboard.



With regards to the delegated access feature, if the intention is that this would only become available from the DAP (as stated in points 4.27 and 5.15 of the consultation), there will need to be sufficient lead time for firms connecting directly to the PDP ecosystem to provide pensions data under the Pensions Dashboards Regulations 2022.

We welcome the FCA's goal to adapt the dashboards regulations following the outcome of the Advice and Guidance Boundary Review (AGBR). But we recommend future-proofing the rules so that targeted support and simplified advice-type services could be offered on day one following the AGBR, rather than as part of a Pensions Dashboards version two. This could most simply be achieved by the FCA maintaining its initial position to include FCA-regulated investment advice within post-view services and amending the wording to cover targeted support and simplified advice-type services once available to customers. In any case, including regulated advice as a post-view service would help to achieve the objectives of the AGBR: getting more people the support they need, at the time they need it. Advice within post-view services would provide an avenue of least friction for a non-advised customer to consider an advice service.

Question 1: Do you agree that the proposed perimeter guidance at Annex H in Appendix 1 provides sufficient guidance to support firms understanding of:

- **the scope of the regulated activity of operating a pensions dashboard service; and**
- **the circumstances in which authorisation (or variation of permission) is required by a firm?**

If not, what else could the perimeter guidance cover to support firms to understand what comes within the scope of the regulated activity?


The Perimeter Guidance is clear and helpful, particularly in the context where a firm may choose to involve a tech firm that was not previously FCA authorised. It provides the necessary background to allow a clearer vision as to when permissions might be needed.

Question 2: Do you agree with our proposals to require PDS firms to introduce a choices architecture to put the consumer in control of deciding initial next steps? If not, what problems can you foresee with these proposals? And how might they be addressed?

The choices architecture appears to create a complex, disjointed user journey where consumers are offered multiple options/choices. The choices themselves seem to be reasonable, but if a consumer wishes to explore different options, they will be presented with multiple exit warnings and caveats. All values in the dashboard will also be caveated so duplicating a great deal of these warnings may deter consumers from actually making necessary retirement planning decisions.

The tone of these proposals gives the impression that the FCA are incredibly nervous about a customer transacting - for example, consolidating, amending, changing their contributions, or choosing a product based on viewing their data. We understand the concerns around sales pressure, but the outcome of the rules could be that sales pressure comes from the firms who do not offer dashboards, and that firms that do offer dashboards are less able to aid a customer to make good financial decisions following seeing their data. This also seems disconnected from the Consumer Duty. The choices architecture shows the intention that the FCA wants consumers to make good decisions, but the prescriptive nature of the proposal creates a feeling of nervousness from the FCA that the consumer might go on to make poor decisions about their pension.

Moving onto the practical implications of the proposals, the consumer journey is hard to envisage when



introducing a set choice architecture. For example, a user could see their view data with company X and in a panel to the side of their value data they may see:

- Click here to see the next step options, revealing a list of the required choice criteria.
- Or a running list of these choices to their right, which would include a constant reminder that they can complain about the service.

As a theoretical concept, presenting the users with ‘choices’ is good. However, visualising how this will work in reality presents issues, especially when attempting to picture implementation across multiple devices. On a desktop or laptop, a user may be able to navigate, but this may prove to be a deterrent for those who will access via a smart phone, as the consumer may feel they are on a cyclical journey based on design, presentation and readability using a device of that size. This will be further reinforced by the choice architecture potentially needing to be shown multiple times during the customer journey. Consumers may be shown the choice architecture, then go on to engage in a post-view service. If an action is then taken from here, the choices will need to be presented again, which could become frustrating and cause the customer to feel as though they are trapped in a loop.


The choices are presented post-viewing the data, but pre-post-view service. Although it is logical after a view service to be asked if you want to take advice/guidance or use the post-view service, the other options of making a complaint and changing consent and authorization seem out of place. These options fit better at a separate stage of the journey. The purpose of the proposal is to empower customers to make better decisions, and customers ought to be better informed, but the ability to make a final decision is missing.

Further to this, in 4.10 regarding choices, it refers to a consumer raising a query or complaint relating to view data. The journey for a query via the current PDP standards is different to that set out in this consultation. Here, a query is treated as a complaint and would be one of the choices presented to the consumer to route them to the MaPS complaints service it seems. Which option would a consumer know to select and in what circumstances if the screen is giving them two different messages?

When considering the point regarding the customer making financial decisions, it would be useful to understand the decisions the FCA believes the consumer would make after viewing their data. As mentioned, consumers may want to consolidate pensions pots or increase their pension contributions. But the rules would prohibit these types of realistic consumer decisions within the PDS environment, and the paper does not consider how a consumer could take them outside of the PDS with minimal friction (other than via a financial adviser – advice is to be encouraged, but not many customers will use it). This does not need to be included in FCA rules, but all stakeholders would benefit from a common understanding across industry and delivery partners of what are likely actions, and track this against actual actions.

The consumer is prompted to go to MoneyHelper, but there are different services for different age groups (Pension Wise or other MoneyHelper guidance). Decisions such as viewing guidance from the provider have also not been specifically mentioned in the proposal, but we assume they are permitted. In future, if the Advice-Guidance Boundary Review proposals proceed as planned, the FCA should consider adding targeted support as a post-view service.

In 4.13, on when and how to present choices to the consumer, it states that it should be readily accessible from the point at which they view their pension data onwards. Based on the current PDP standards, consumers will be able to see their summary value data as part of the confirmed full match. At this point, they could click on the full ‘view’ details, which will include an option to ‘contact administrator’. We need to understand from the FCA and PDP, if a consumer uses this option and it equates to them speaking to a firm’s contact centre representative to raise a query about their pension view data, how does this align with the FCA exit communications? To fully



understand this, we need to see an example of journey mapping from the FCA and PDP, as well as consumer feedback of the proposed journeys to understand how these routes would work without conflict.

Question 3: Do you agree with our proposals concerning exit communications? If not, please explain why.

Although we understand the rationale behind the exit communications, the number of warnings when considering both the choice architecture, followed by exit communications feels overwhelming. The embedding of Consumer Duty within firms' operations allows for less reliance on disclosures, which are known to be a major barrier to customer engagement, understanding and taking decisions. The balance between consumer protection and consumer benefit has swung too far towards risk avoidance, and we would like the FCA to ensure that the warnings are not so severe as to put the consumer off using dashboards, including post-view services, altogether.

The written framework reads well, but when this is translated into a real customer journey it is both negative and disjointed. It could potentially even heighten fears regarding pensions and digital technology for some users.

To illustrate this point, we would urge the FCA and PDP to produce a high-level customer journey process map to represent the various steps and intended customer options throughout. The FCA should also speak to firms which have already thought about and mapped these journeys to understand how this works in practice. The FCA and PDP should then work together to consumer test the end-to-end customer journey with variations of these warnings to ensure that customers do actually understand them, to check whether they add value and whether they are inserted at the right points.

When a consumer exits a dashboard, the FCA must consider whether warnings should be tailored depending on the environment the user will be directed to. For example, if the journey takes them from the PDS to an existing FCA regulated environment then this should not be required, otherwise this may imply to the consumer that the firm is unregulated. However, if the PDS provider takes the consumer to a non FCA regulated environment, then this type of warning is needed.

The negative framing of the exit communications gives the impression that the FCA is concerned about warning consumers of the apparent risks of leaving the 'safe haven' of a regulated PDS, into a world of post-view services. However, arguably consumers will benefit the most from post-view services by taking action based on what they have discovered from the find/view part of the dashboard. It is therefore important that the FCA does not discourage the consumer from continuing on their journey to use these post-view services.

The third bullet point asks the PDS firm to communicate to the consumer that they will not be subject to the same legislative/regulatory requirements as within the PDS. This assumes that the consumer has a working knowledge of these regulations, which they do not. As a result, will the regulations also need to be explained in this set of communications? If so, the rules are at risk of overloading the consumer with confusing information that might lead them to prematurely end the journey due to lack of understanding.

In finalising the rules, and considering their impact, the FCA should take into account that many customers will also exit a PDS simply by closing the browser or app, or leaving it open without concluding. In these cases, exit communications cannot be shown but the same risks may apply. We suggest that the FCA work with the PDP and industry to test how this might work in practice. In these discussions, we would ask the FCA to consider whether there is an alternative option to including both the choices architecture and exit communications in the FCA regulations. For example, could these be included in PDP Guidance or Design Standards to enable them to be changed more readily once further testing and consumer input is received? This will have the same desired effect, whilst allowing for swifter revisions.

Question 4: Do you agree with our proposals to require firms to inform the user if a delegate will not be able to use the firm's dashboard to access the user's data? If not, please explain why.

Allowing a PDS the choice as to whether to allow delegated access is sensible in the sense that this frees up different design choices. The FCA, with other delivery partners, will need to make clear how much of a priority delegated access is for the programme. We think it should be an option, but clarity on this is important because it connects to other aspects of delivery.

The need to inform the user links back to our answers to questions 2 and 3 around overloading the user with warnings and caveats. Providing a warning that a delegate will not be able to use the PDS to access the user's data implies that the user has logged on, assuming that an advisor would use the dashboard, which does not seem logical. The user is more likely to assume that an advisor has their own dashboard.

Further to this, we need clarification as to whether the MoneyHelper dashboard will allow delegated access. The FCA rules are predicated on delegated access being built by PDP in time for the Dashboards Availability Point (DAP). The Minister for Pensions has indicated that the DAP may come prior to the legal connection deadline in October 2026. But there are two references (4.27 and 5.15) where the FCA suggests that delegated access delivery is in doubt. The PDP have also not mentioned delegated access in any recent communications, and there is very little detail on the PDP website. It appears that delegated access was not a priority following the programme reset in 2023, but this is a complex functionality that will require significant consumer and advisor testing. If the MoneyHelper dashboard does not allow delegate access, it is entirely possible that this will not be supported by any dashboard.

In regard to timing, if the intention is that delegated access would only become available from the DAP (as stated in points 4.27 and 5.15 of the consultation), there will need to be sufficient lead time for firms connecting directly to the PDP ecosystem to provide pensions data under the Pensions Dashboards Regulations 2022.

Given that the FCA is proposing rules based on functionality that may not be available until 2026, it is hard for substantive comment to be made. Without relevant specifications, it is not possible to plan or estimate the cost of delivery, and so it is important that the FCA is clear as to when these details will be confirmed.


Question 5: Do you agree that permitting data export to PDS firms (with the investment advice permission) for investment advice purposes creates an unfair competitive advantage in relation to advice?

Question 6: Do you agree that our proposal (to remove the option of data export to the PDS firm, or connected person, for investment advice) is appropriate? If not, what would be a more appropriate and competitively fair approach for the FCA to adopt? Please provide evidence where available.

We have consolidated our answers to questions 5 and 6 below.

Advice and the goal of presenting advice as an option has been a clear requirement throughout the project and one measure of success will be more people taking advantage of guidance and financial advice. Getting people the help they need is also a key objective of the Advice Guidance Boundary Review. We recognise that firms may present COBS 4 compliant financial promotions for regulated investment advice, but excluding the option of data export for advice as a post-view service goes against these objectives and is unhelpful for consumers. It represents a barrier to the uptake of regulated financial advice, for three reasons.

1. While we recognise that a consumer could provide delegated access to a PDS firm once prompted to do so



by their adviser, this assumes that the consumer finds an adviser in the first place. It is possible that one of the best ways for a consumer to find an adviser is through taking up advice within a PDS firm's post-view service. At minimum it represents a low-friction avenue for advisers to access regulated financial advice, which industry and regulators agree is positive for the consumer.

2. This additional point of friction slows down the transfer of data to the adviser. The value of data export is that the advice process can be shortened and more accurate, lowering the cost to offer the service and ultimately pushing down prices. Therefore, one of the major benefits of dashboards is diminished through excluding advice from post-view services.
3. If the FCA enables investment advice as a post-view service, then it would be much easier to enable targeted support and simplified advice services following the outcomes of the Advice Guidance Boundary Review.

Assuming appropriate disclosure, enabling the customer to choose a route with much less friction toward a high-quality product overrides potential competition concerns in our view. The user has chosen the firm's dashboard to view their pensions information, and to also understand the advice options that may be available. Due diligence of the advisor, through engagement and discussing terms will then educate the customer, allowing them to proceed or look elsewhere.

Question 7: Are you currently interested in becoming an operator of pensions dashboard services?

- **If yes, are you currently FCA authorised for other activity?**
- **If not, was it the proposals in this paper that deterred you?**

We would not be interested in becoming an operator of a pensions dashboard service due to being a trade body. It also may be in some firms' interest not to offer a dashboard themselves, and instead look to direct customers to the MaPS dashboard, then encourage them to come back to the firm's own website after viewing their pension information. The FCA should take this into account when finalising the rules.

Question 8: Do you have any comments on our cost benefit analysis in Annex 2?

We do not believe that the proposals support the first and second bullet points:

- Enabling consumers to control their journey through and beyond the pensions dashboard service.
- Creating opportunities for consumers to take advice or guidance, or to seek further information.

Both the choice architecture and the exit communications will actively discourage consumers from doing anything beyond the dashboard service. To achieve the expected benefits, as well as being supported with tools, advice and guidance, consumers need to be supported all the way through to making a decision (for example about consolidation or contributions). This means either allowing these decisions within a PDS and post-view service, or at least all delivery partners and industry having a common understanding about how the customer can be supported to make those decisions after using a PDS and post-view service.

We would like to know what benefits the FCA anticipate will arise, and whether there could be higher consumer benefits with lower costs.

Additional Comments

Outside of the scope of the questions, there are still several points that should be considered by the FCA.

- PERG12.3.1 states that limited forms of advice can be advertised on dashboard platforms, yet other rules prevent delegated view data being downloaded by advisers. Therefore, any advice given within the scope of these rules would require the adviser to collect the view data independently from the pensions dashboard platform, leading to poor user experience. Until we get a clear definition of where the post-view services end, it is not clear which forms of advice will be captured by the rules. Limited advice can be advertised, but it is not clear where the boundary of these rules lie, for example, do the rules cover leads generated by the advert, or does it cover any advice where the data has been passed to an advisor via any form, or is the scope limited to somewhere in-between?
- We welcome the FCA's goal to adapt the dashboards regulations following the outcome of the AGRB, but we recommend future-proofing the rules so that targeted support and simplified advice-type services could be offered on day 1 following the AGRB, rather than as part of a Pensions Dashboards version two. This could most simply be achieved by the FCA maintaining its initial position to include FCA-regulated investment advice within post-view services, and then amending the wording of the rules to cover targeted support and simplified advice-type services once available to customers.
- Where delegated access to advisers is taken forward, advisers will want to see more up to date valuations to base their reviews and recommendations on. Many dashboard data providers will be using annual statements as the basis for the 'view' data, using value data that may have been produced up to 13 months ago. In this case, or where there are products which provide minimal information, this may drive up the volume of queries and manual calculation requests. Although an unintended consequence, this should be considered as part of the scope of enabling delegated access as firms may need to review their own operational processes, and resource capacity to support additional demand.