Pensions Dashboards Programme Consultation

Standards, specifications, and technical requirements

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2. Background

2.1 About the Bravura Solutions Group

Bravura is a global supplier of mission critical administration, record keeping and financial messaging systems to the financial services industry. Our solutions power some of the world's leading financial institutions, supporting more than 18 million end client accounts with over £3 trillion of assets under administration.

We are driven by our corporate purpose – to make our customers successful. We do this by developing innovative cutting-edge software solutions that become the vital engines powering some of the world's largest institutions.

With over 30 years of experience, our next generation software solutions help clients:

- increase operational and cost efficiency.
- enhance their ability to innovate and grow.
- minimise their risk.
- enable them to provide an enhanced level of customer service.

We have a depth of expertise with a team of over 1,400 people in 12 offices across Australia, New Zealand, United Kingdom, Europe, Africa, India, and Asia, supporting our growing customer base.

The Bravura Group, has extensive experience in the financial services technology sector which is supported by its group of companies comprising of:

- Midwinter – provider of comprehensive financial planning and modelling software for the advice industry in Australia.
- Finocomp – are specialist providers in registry-agnostic microservices.
- Delta Financial Systems - providers of technology for the complex pensions administration for SIPPs (Self Invested Personal Pensions) and SSASs (Small Self-Administered Schemes) in the UK.

Bravura welcomes the opportunity to respond to the PDP consultation standards and call for input.

We are an ardent supporter of Pension Dashboards, and we are developing our Dashboards Connect ISP services for our customers to meet their legislative requirements. We look forward to our future involvement with the Pensions Dashboards Programme as the project progresses into the Beta phase and beyond.

3. Overview

Bravura is delighted to offer our response to the Pensions Dashboards Programme's Consultation on standards, specifications, and technical requirements. As a trusted multinational supplier of mission critical financial software to some of the world's leading financial institutions we are well placed to offer the breadth and depth of our knowledge to assist in the success of Pensions Dashboards. Indeed, inputs to our response to this consultation come from across our businesses across the globe.

We see the Programme as a transformative step-change in how UK citizens will be able to access their pensions information and manage their money for later life. We are incredibly excited about what this will bring to consumers, and how technology can help with education, guidance, advice, knowledge, and better outcomes for these citizens. Bravura will help our clients navigate the compliance and customer-focussed opportunities that Dashboards offers them, and we have been active in talking to firms across the industry about Dashboards and their customers.

Our team at Bravura have analysed the standards and technical documentation and have offered our thoughts honestly and faithfully and would be delighted to discuss any points in further detail. As with any project of this size and scale, it takes a huge amount of time and effort to get these outputs and guidelines correct and fully defined. We have, where applicable, offered suggestions for improving clarity, content, consistency, and readability for the wider industry.

In many cases the issued standards and technical documents are incomplete, and this has meant that there are still gaps and uncertainties for the delivery of CDA (Central Digital Architecture) compliant solutions on time, and to spec. Continued delay in issuing complete standards and technical documents risks the success of the programme, the ability for data providers to meet the requirements on time and will increase costs for connection by increasing the amount of rework required. Bravura would urge the Programme to ensure enough resource is applied to these gaps and the industry is involved as early as possible.

We believe the View Data response time standard is too short and expects a static data store for View data, which may not be in a consumer's best interests; this should be increased in length and stated like the Find requirement. Our belief is that an increased time here would not be noticeable or seen as a barrier by customers as similar journeys for other financial (and non-financial) products exhibit longer wait times to produce results, and as long as this is not excessive, consumers are happy with, and understand the time that it takes to get the responses.

We draw particular attention to our responses on the Reporting Standards, we have given considerable feedback here, as we are concerned that this requires a lot more work before it will be complete; we are also concerned that Data Providers could misinterpret their obligations here, and therefore a delineation of (where a data provider uses the services of an ISP) what is expected from an ISP vs what is expected from a Data Provider.

The delivery of services to the adviser community are currently underrepresented and we look forward to seeing future standards incorporate how Dashboards can serve this market in serving their customers.

We greatly look forward to the upcoming revisions of these standards and technical documents and we also offer our services to PDP for early review of updates to increase the velocity of the changes.

4. Consultation Response

4.1 Code of Connection

4.1.1 Operational standards

4.1.1.1 Question: Do any of the proposed requirements pose a specific problem for your organisation, if so, what?

The current operational standards are incomplete, so it is difficult for us to give fuller feedback on issues posed, however, the following are areas that are of concern or require clarifications:

4.1.1.1.1 CoCo3.1.1

1. It is unclear how MAPS/PDP may require these roles/contacts be split between and ISP and Pension providers?
2. Is there an expectation from PDP for some of these roles to be a Pension provider contact if the ISP is offering/owning the service and connecting to the ecosystem?
3. Examples from PDP would be useful.

4.1.1.1.2 CoCo3.1.2

4. These are not published; therefore, Bravura cannot currently comment. Given relatively short timeframe before first tranche of connections, even a draft would be useful for Industry to start planning these activities.

4.1.1.1.3 CoCo3.2

5. These are not published; therefore, Bravura cannot currently comment. Given relatively short timeframe before first tranche of connections, even a draft would be useful for Industry to start planning these activities.

4.1.2 Security standards

4.1.2.1 Question: Are there any areas that you consider are missing from the code of connection?

4.1.2.1.1 General Observations

1. The section ignores ISPs entirely, and whilst we understand the pension data providers are ultimately responsible, it would be useful to suggest delineation points.

4.1.2.1.2 CoCo1.1.3

2. We feel this statement is currently too loose in its scope definition (it could be interpreted to include any system downstream where data is stored) and it seems to expect a certain solution design, which may not be correct in all cases. For example, by default we encrypt storage at the disk level for hosted solutions, and we do not intend on storing PII directly in our Dashboards Connect ISP Solution.
3. Therefore, is the requirement to encrypt data at the database level for only PII data, and what is the limitation for this requirement?
   3.1 For example, if a provider develops or buys an API that connects securely to their admin system, must all data in that admin system be encrypted at AES-256?

4.1.2.1.3 CoCo1.2.2

4. We believe that the requirement relates to the connector to the ecosystem, rather than any downstream systems (such as a backend admin system connected by APIs), it would be useful for the scope to be clarified.

4.1.3 Service standards

4.1.3.1 Question: Do the proposed service levels seem reasonable for a digital service?

4.1.3.1.1 General Observations

1. We would expect there to be a distribution of service levels to be stated (for instance 95% within service standard).
2. We believe that the standards are too prescriptive and restrictive to allow for innovation in the space, as well as to provide better information to the dashboard's users.

3   These prescriptions could lead to unintended consequences that deliver a lower-quality output for the dashboard's user, for instance because a data provider decides to use static data rather than real-time data and calculations.

4   Experiences of other financial and non-financial websites would suggest that users are quite happy with waiting a number of seconds for data as long as the website shows that it is 'waiting'.

   4.1   Compare the market, money supermarket and others will return values in real-time as they receive them, and customers are quite happy with this process as long as the time is 'reasonable'.

5   We would be looking for publication of CDA operational hours and detail of any CDA maintenance windows and how data providers and dashboards would be expected to interact during that period.

6   In the unlikely event of unexpected CDA downtime, it would be helpful for ISPs and pensions data providers to understand how metrics should be reported during this period, as well as processes surrounding reporting and recovery from unexpected downtime.

4.1.3.1.2   CoCo2.1.2

7   We think that 60 seconds with a 'good' target being 15 seconds is a reasonable expectation. This allows for varied connection types and any temporary latency issues.

4.1.3.1.3   CoCo2.1.3

8   Please see our response under your specific question raised in '**Connection Guidance**'.

4.1.3.1.4   CoCo2.1.4

9   It is unclear as to what the expectation is, as this requirement is at odds with CoCo2.1.5 which states 'best endeavours' outside of Monday to Friday 9-5pm.

10   We assume that the backlog of find requests will be stored with the PDP's PFS and upon restoration of service, it would be useful for this to be clarified.

11   We are unclear on how CDA would be informed that the service has been restored.

4.1.3.1.5   CoCo2.1.5

12   It could be construed that the uptime is calculated within the hours stated, therefore we suggest that this is reworded to ensure clarity.

4.1.3.1.6   CoCo2.2.1

13   We are unsure of how this can currently be undertaken, so are looking forward to future guidance and API capability.

4.1.3.1.7   CoCo2.2.4

14   We believe that in the case of an ISP unplanned downtime you expect a report from both the ISP and for each connected scheme/provider, but the requirement is unclear.

4.1.3.1.8   CoCo2.2.5

15   We believe that there may be needs to bring a service down with less than 5 days' notice, therefore this should be an aim.

   15.1An example of where a 5-day planned downtime would not be appropriate would be to implement critical system patches where vendors recommend immediate patching.

4.1.4   Connection guidance

4.1.4.1.1   General Observations

1   The first two paragraphs are a little unclear and difficult to understand and could do with being rewritten/edited.

4.1.4.2 Question: CoCo 2.1.3 requires view request responses within 2 seconds. This prioritises a fast response for the consumer. It may, however, create a barrier to calculating real time values for some providers. We would be particularly interested in views on this approach.

4.1.4.2.1 CoCo2.1.3

2 We believe that this response time is far too tight. It does not allow downstream calculations systems enough time to complete any processes and therefore provide the dashboard user with an up-to-date value.

3 There will have to be introspection of the user token within this time, which will make a direct reliance on CDA for this response time being met.

4 This response time also puts unnecessary pressure on batch processes to create values which may never be used.

    4.1 The potential environmental impact of regularly processing batches of calculations (over millions of policies/accounts) for citizens that may never use a dashboard will collectively be huge.

5 We expect that the suggested requirement will restrict current and future innovations to the detriment of dashboards users.

6 UK citizens are already used to waiting tens of seconds for online services to assemble results - insurance, holidays, hotels, credit card deals etc are all good examples.

7 Checking your pension dashboard will not be something where people will expect results within milliseconds, and this can also be managed by the UI.

4.1.4.3 Question: Do the proposed steps for connecting to the dashboards ecosystem directly seem reasonable?

4.1.4.3.1 General observations

8 We would expect further guidance/flows/checklists for connecting organisations to follow – currently the guidance is mainly prose.

9 Based on what we understand from working with the programme (tacit knowledge) we do not see any unreasonable requirements, but we do see areas where clarity and scope can be improved.

4.1.4.3.2 Roles

10 For an ISP we may wish to have a 'team' performing some roles to allow for the main contact being 'away', we would request for allowances to be made for this as indicating a single named individual may cause unnecessary delays.

4.1.4.3.3 Primary business account

11 Some of these parts may not be applicable to an ISP, therefore they should be indicated as such (i.e. PSR number etc).

4.1.4.3.4 Registration

12 We feel that some added clarity over what steps relate to ISPs (and what is different) would be useful.

13 There is no current allowance for the fact that technology suppliers may create software solutions for FCA registered firms to use and as such may allow connection through the same gateways, we see this as ensuring that CDA and PD standards are met consistently with an added oversight from a reputable ISP.

4.1.4.3.5 Testing

14 We think that this seems sensible, however, specifics of testing and expected timeframes would be welcome.

4.1.4.4 Question: Do the proposed steps for connecting to the dashboards ecosystem (via a third-party connection) seem reasonable?

4.1.4.4.1 General observations

15 In section 3 under 'Connect via third party…' the third paragraph is somewhat unclear and wordy.

    15.1 For example, in the bracketed note it is unclear who this sentence is 'speaking' to, is it an ISP?

16 Alongside the previous question, we would expect further guidance/flows/checklists for connecting organisations to follow (both the ISP and the data providers). The existing standards set the expectation, but not necessarily the expectation on process order or the timeframes involved.

17 On reflection it would be useful to a user of these standards to have it more clearly indicated what is expected of and ISP and what is expected of a data provider, when an ISP is used.

18 Based on what we understand from working with the programme (tacit knowledge) we do not see any unreasonable requirements, but we do see areas where clarity and scope can be improved.

4.1.4.4.2 Question: Does the proposed timeframe for completing these steps to connect seem reasonable?

19 We feel that the use of 'up to 30 working days' could be misconstrued, therefore should be amended to give an overall timescale and specifically exclude time to contract with and connect to the ISP within that timeframe.

20 Within section 3, where reference is made to agreeing a connection date, we feel that this could be more prescriptive, and we can foresee problems with 'bunching up' of connections if you only start to agree connection dates for the current window, within that window – we feel that you may wish to allow data providers to book their connection date in the connection window earlier than the month of the connection window.

4.1.4.5 Question: Is it clear what pension providers/their third-party ISPs (Integrated Service Providers) or dashboard providers will need to do to connect?

4.1.4.5.1 General Observations

21 We see a few potential cases that may require further thought, these are:

21.1 Whether it is possible to register multiple providers on a single endpoint (we expect yes, but it is unclear) and therefore is the process to update an existing registration with additional organisation detail different to the documented registration process.

21.2 Whether a data provider only registers a single live endpoint or is it possible to register the organisation but with multiple live endpoints serving different pension data.

22 We presume an ISP can 'bulk register' new data providers but added detail on this would be useful.

23 We believe it would also be useful in the guidance to understand the 'unhappy paths' so that parties understand how to rectify any issues.

4.1.4.6 Question: Is there any additional guidance you need in relation to connection? And if so, what?

4.1.4.6.1 General Observations

24 Whilst not specifically related to this guidance, what are the guidelines for participating in the beta testing phase?

24.1 For example, do data providers need to complete the connection process to participate in beta testing?

24.2 Where an ISP participates in Beta testing and passes the acceptance criteria, is the process for registering to a live endpoint be lighter than for an ISP / pension provider who has not participated in Beta?

4.2 Data

4.2.1 Data standards

4.2.1.1 Question: Are you confident that the proposed data standards adequately cover the benefit structure of all pension providers? Can it express the correct values to all savers? If not, please share a brief description of the relevant benefit structure?

4.2.1.1.1 General Observations

1 We feel that in the case of DB benefits the data being requested for these benefits may be far too overwhelming and we would suggest a return to the looking at the aims of the dashboards programme (to provide a simple overview of peoples' pension pots and to allow them to locate 'lost pensions') should be considered in order not to overcomplicate the dashboards experience for the user.

    1.1 As an example, we feel that holding details of different tranches of benefits and associated details is unhelpful for most users who want an indication of what they have now and what they are likely to have at retirement.

    1.2 Where DB benefits are overly complex, the user should be redirected to the administrator who should be able to provide far more detail than we would expect from the dashboard.

    1.3 Given these statements, we urge the programme to consider keeping the DB benefit results as simple and as few as possible.

2 We have found a possible conflict between PDP data standards and the DWP consultation response and would appreciate this being resolved, the following text details the issue:

    2.1 The PDP data standards confirms that members who take an UFPLS (Uncrystallised Funds Pension Lump Sums) are excluded from being presented on the dashboard and they are not considered as an 'active' or 'deferred' member in the counts for dashboard connection. However, DWP consultation response states Government response: Draft Pensions Dashboards Regulations 2022 - GOV.UK (www.gov.uk):

    2.2 *"5.66. Clarity was sought in relation to UFPLS cases. UFPLS is derived from tax legislation and is a way of taking some of an individual's benefits from a scheme, while leaving the remaining benefits uncrystallised. Therefore, members of schemes who take UFPLS payments **are not considered pensioner members."***

    2.3 Therefore when a member has taken an UFPLS and still has active funds remaining in the scheme, will need their data passed up to the dashboard because the DWP are not considering them as pensioner members?

    2.4 If they included for the dashboard, please confirm whether their active (or deferred) membership counts towards the numbers of members for connection staging times.

4.2.2   Usage guidance

4.2.2.1 Question: Are the values allowed for the accrued (2.3xx) and ERI (Estimated Retirement Income) (2.4xx) warnings sufficient? Are there any other common reasons or scenarios you think these warnings should cover (bearing in mind we cannot support scheme-specific warnings)?

3 We have considered that data items 2.305 and 2.405 show a validation that states that it "Must be a valid date in the future", but it is conditional on data items 2.314 and 2.414 respectively.

    3.1 Where these data items are not available, (for instance because the member has passed their normal retirement date, or they have funds less than £5,000 or they are within 2 years of retirement) it is unclear which of the given options (ERR, EXC, TRN, or MAN) should be chosen or whether there should be another validation option for this purpose.

4 Where a member is still 'active' or 'deferred' after their normal retirement date they will no longer receive statutory illustrations.

    4.1 Clarity would be useful in these cases that the accrued data and ERI data should not be passed back, and a suitable warning is given on the dashboard to support why a member does not have this data.

5 We have some points around data item 2.406 the value of the accrued pension.

    5.1 It would be useful to confirm whether this should be shown as an income for all types of benefits or is simply the DB benefits (the brackets suggest this is what is meant)?

    5.2 If the income should be shown for DC schemes, how is the income determined?

6 We have some points around data item 2.411 accrued pot:

    6.1 Clarification would be useful to confirm whether this is the value of the current pot (or most recent one produced in the last 12 months), or the current value escalated up by an accumulation factor to the accrued payable date (data item 2.405)?

    6.2 Added clarity is requested as to whether an inflation factor should be applied to show the accrued pot in real terms?

4.2.2.2 Question: Would the ability to add a short piece of free text to cover pension provider specific issues be workable for you, or introduce a new burden? If so, how many characters would be required and what topics would it cover?

7 It is Bravura's view that this would not provide anything significantly different for the user's dashboard experience compared to a standard warning or text. However, this could add significant complex coding, including potential additional fields in data administration systems, for the free text to be passed back to the dashboard for the relevant members.

8 We refer to our earlier comments, the original aims for Pensions Dashboards are to reunite people with their pensions and to create engagement – spurious complexity will deviate away from this and could be a 'turn off' to citizens.

4.2.2.3 Question: Without a new unique reference to link two pension elements together, the benefit values may get presented separately in a dashboard. Would the requirement for a scheme to create that new reference and share it with their other administrators be more onerous than dealing with any potential downside from not presenting the benefit values together onscreen?

9 Generally,, we believe that this may be overly complex and delivers limited, if any, benefits to the dashboard's user.

10 We feel that we do not have enough information to determine whether seeing these two data items together adds significant value to the user of dashboards, however:

10.1 Building a solution to map schemes together that are held by different providers through a unique reference would mean that both schemes would need to hold the same information in their data. This could incur significant costs and difficulty for older systems to hold this data, and to return it back to the dashboard.

11 We suggest that a more pragmatic approach would be to provide clear messaging on dashboards to suggest that some schemes may be linked but will not necessarily be shown together.

11.1 In most cases the employer information is returned to the dashboard and whilst we appreciate that some dashboard users may have multiple schemes, the ability for users to associate pensions schemes through the employer data is present.

4.3 Design

4.3.1 Design standards: call for input

4.3.1.1 General Observations

1 Bravura is of the opinion that Pensions Dashboards will be a huge step-change for individuals in finding and getting basic information about their various pensions and lifetime/retirement savings, however, as we have drawn attention to elsewhere in our response, we are concerned that the 'perfect is becoming the enemy of the good'. That is to say that we are gravely concerned that the Dashboards Objectives as stated in part 2 "…putting consumer at the heart…", "…clear information…" and "…simple to understand…" are likely to be obliterated due to spurious detail being put into the data gathering and (subsequently) presentation.

1.1 This is wholly in line with your research findings in Appendix A "…many expressed feelings of being overwhelmed with complicated information…." and "not understanding the pension information they are eventually presented with…"

2 In our experience, a consumer will likely 'switch off' or 'ignore' vast amounts of confusing data, and most likely (although we would expect your user research to drive this) the user wants indications of two things:

2.1 What they currently have and where.

2.2 An indication of what this might give them at retirement.

3 We firmly feel that to split out various tranches, pots, dates, underpins, bridges and other complexities will be detrimental to the user experience and confuse consumers, and as such are contrary to the aims stated in section 2.

    3.1   A data indicator would be far more useful, and then a consumer can investigate additional benefits and underpins if that is what they want to do.

4   We would **strongly recommend** that the programme **review** the overall data requests (particularly for DB schemes) against the **aims and objectives of Pensions Dashboards**.

5   Our industry is infamous for providing customers reams of impenetrable data (unless you are a pensions consultant or actuary), and we are at serious risk of doing that here and wasting our opportunity to engage people with their lifetime/retirement savings.

6   Some minor points:

    6.1   We note that there are two Appendix A's and assume this is to be corrected.

    6.2   There are some typos throughout the document.

4.3.1.2   Question: Do you have any challenges (or support) in relation to our developing policy on design standards?

7   Broadly we agree with the direction of the standards, but do have a number of suggestions, in particular suggestions around delegation for the advice community.

4.3.1.2.1   Summary

8   We believe that the summary, as suggested, will be too cluttered displaying all that information.

9   We think that having the accrued and projected values within the same space will be confusing, a better outcome might be for the ability for the user to toggle between current and projected values. In particular visually impaired, dyslexic or neural divergent people may find combining different types of values on the same display at the same time difficult grasp.

10   We believe that whilst common standards are useful, the ability for a dashboards user to select different views of the data should not be precluded so long as the default is to direct the user to the 'standard'. Precluding evolution of the design and innovation will cause potential detriment to dashboards users.

4.3.1.2.2   View data

11   Within the view displays the summary view should not contain information that is not essential to a user. For example, the start date of a pension might be useful in 'detailed information' but is unlikely to be important to a typical user.

4.3.1.2.3   Display warning and explanations

12   We suspect that the mention of tax may be confusing, and as we know there are a number of taxes that may or may not be payable, so this warning should have links to more information about tax for citizens that want more information.

13   The dashboard user should be able to easily see which figures are more recent than others, for instance we will be helping our clients to provide up-to-date values in many cases, but other values may be stale by many months (which in the case of DB schemes is not a huge issue).

14   We suggest that there could be confusion by a dashboards user over the projected values of DC benefits given the FRC hasn't aligned TM1 assumptions the way that would have been good for dashboards users (ensuring a more prescriptive, level playing field approach to assumptions. This could cause dashboards users to make incorrect assumptions due to one provider making more optimistic assumptions than another. We believe that the display standards will need to be cognizant of this and inform users.

15   As with most warnings and small print, we have concerns that most users will skip past it and may not actually understand the impact even where they do read it. We suggest that this is an area where more research may be required, as well as determining who is being protected (anybody?) by these.

4.3.1.3   Question: Do you have any evidence to support your input?

16   We would point the programme to a number of resources in support of our suggestions:

    16.1 Your own research.

16.2 Design and display of comparison sites (for simple dashboard displays) – such as moneysupermarket/ moneysavingexpert/ confused.

16.3 Bravura's conversations with our clients who support advisers have informed our responses.

16.4 Bravura's global team's combined experience in SIPP, complex SIPP, Master Trust, DB, Hybrid, CARE, GPP, PP, SSAS and other arrangements have also fed into this.

16.5 Bravura's global team's experience in building consumer-facing web interfaces in Australia, New Zealand, South Africa, and the UK.

4.3.1.4 Question: Have we omitted any issues in developing our policy on design standards?

17 Some areas we have mentioned previously, however, we encourage the Programme to err on the side of simplicity to help users engage (dashboards' primary audience isn't someone that is very familiar with their retirement savings). The service can evolve as users become more familiar with the dashboard concepts – this programme will have to educate users and enable an emerging supporting ecosystem, and this will develop over time.

18 We would encourage the policy to hold more information about making this information digestible by minority groups, especially those with disabilities or specific needs.

4.3.1.5 Question: Do you agree with our approach to design standards principles and assumptions?

19 We believe the approach, with further development and shaping, seems sound, and Bravura would welcome the opportunity to help PDP in this area.

20 We do think that the 'users' section needs some work to make it less vague and subjective.

21 The suggestion of commonality between dashboards may be favourable in the first years of dashboards, but there should be suitable room given for design evolution and for dashboards to evolve to serve specific markets – keeping a level of control but without putting QPDS's into straightjackets.

22 The QPDS section needs to be evolved to consider the adviser community, and to allow for innovation and the ability to serve particular demographics.

4.3.1.6 Question: In you or your organisation's experience (please provide evidence if you are able), are there any important principles or assumptions missing in our approach?

23 Accessibility standards and expectations for users seems to be the main missing point.

24 We question whether the standards should provide levels of 'help' and then redirection to MAPS helpers if necessary.

24.1 Experience of diverse types of users with several types of pensions suggests that more support materials will be required for users, and specific signposting.

24.2 We would suggest that the evolution of personas might be useful to ensure a more directional approach to standards creation and evolution that will allow the standards to flex with technology, understanding of how users interact with the dashboards and develop service offerings in an agile fashion.

4.3.1.7 Question: Are we right to favour the user over the QPDS where there is any conflict between their needs?

25 In most cases we believe that this is sensible, however, there may be areas that become clear during running of dashboards where this is not the case. In which case this may become unworkable, so we would suggest this may need some more modelling-out and stress testing.

4.4 Reporting

4.4.1 Reporting standards

4.4.1.1 General Overview

1. Bravura is of the opinion that the reporting and monitoring standards needs considerable added work and re-presenting.
2. The use of the word 'reporting' is being misinterpreted by many in the pensions industry, we would call most of the requirement 'service monitoring'.
3. A not-inconsiderable percentage of data providers have been quite specific about data reporting, and in many of these cases they are misinterpreting requirement and often are at odds with what we believe PDP/CDA are trying to achieve.
4. We note there are a number of typos and mistakes in the document that we expect will be tidied in a future draft.
5. Given the brief time to deliver the first window of staging data providers our concerns are that we are currently building an ISP solution for our customers and reporting data is important to bring in at each stage of the build.
6. We note there are still numerous areas within the reporting standards that need to be agreed and clarified, this has a considerable impact on building and delivery of connection, notwithstanding the associated rework costs.
7. We would welcome the outstanding points and worked examples to be delivered at the earliest opportunity.

4.4.1.2 Question: Please provide comments on our overall breadth of information required.

8. We have a number of comments and concerns around several areas.

4.4.1.2.1 Business Audit

9. It is unclear what purpose the 'event type' concatenation relates to – especially the number. The GUID would suggest the unique key.
10. There are references to audit records – we don't intend to store data other than the fact that a message has been processed in a certain way, more information is required on the nature of auditing data that is required to be held, transmitted, and associated retention time(s).

4.4.1.2.2 QPDS data items

11. We are unclear as to why this data is not simply captured by CDA when the API is called – this seems a duplicate and wasteful approach.

4.4.1.2.3 Data providers

12. This section seems to be unhelpfully (non-sequentially) ordered
13. We would expect the audit of the create/update/delete of a PEI to be captured by the API, not a secondary call – again, this seems a duplicate and wasteful approach

4.4.1.2.4 Frequency

14. We strongly expect that the CDA APIs should be able to capture this detail as the API is called, so therefore we are surprised that this seems to be duplicating processes and will put added strain on both PDP and provider/ISP systems
15. We have not had this API defined yet by the Programme; therefore, we are unable to determine whether it is appropriate, and need to understand about any limits on calls, and whether it can take a batch update.

4.4.1.2.5 Protective monitoring

16. This section seems to be unhelpfully (non-sequentially) ordered

17 It is unclear what purpose the 'event type' concatenation relates to – especially the number. The GUID would suggest the unique key.

4.4.1.2.6   QDPS protective monitoring event

18 This section does not seem to make sense

19 There is no information on the processes for complying with this section

4.4.1.2.7   QDPS protective monitoring data items

20 We think it would be useful to clarify whether you expect the IP address data to be specified as v6 or v4 format.

21 We are unsure of what the description of location means, please could this be clarified?

22 More information surrounding what is expected in the 'ID_service' field is needed, the description refers to a 'package of information' that isn't defined.

4.4.1.2.8   Data provider protective monitoring event

23 We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

24 We think that for bullet points 1 and 2, they should not just refer to dashboards, for protective monitoring it should relay any invalid call.

25 The final paragraph talks about contributing 'intelligence about security', it would be helpful to understand what is expected here and the mechanism(s).

    25.1 This is particularly important for ISPs as they will need to build this into their service models.

4.4.1.2.9   Data provider protective monitoring data items

26 We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

27 We believe that this section is currently too vague for CDA to receive consistent information from all data providers and ISPs, we suggest that the scenarios and data required by the CDA, as well as the full spec of the API should be supplied as quickly as is possible.

4.4.1.2.10   General data items for operational monitoring

28 The scope of codes to be used and any additional information needed has not been fully defined, therefore we cannot provide an in-depth review.

29 As per other 'Event Types' the reason and usefulness of the concatenation of the code is unclear.

4.4.1.2.11   QDPS operational monitoring event

30 This section is poorly worded and seems incomplete.

4.4.1.2.12   QDPS operational monitoring data items

31 More information surrounding what is expected in the 'ID_service' field is needed, the description refers to a 'package of information' that isn't defined.

4.4.1.2.13   Data provider operational monitoring event

32 We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

33 Bravura believe that this section needs some added work to firm up the data needed and frequency.

    33.1 A frequent 15s ping from each endpoint feels like overkill and will generate a lot of traffic and data for CDA which may be of limited use.

34 The reference of 'response time' is too vague – clarity on the specification of this value would be useful. Also, we note that there are other 'reporting items' that may already give this information on a per-transaction basis and therefore this will be duplicating information that CDA already has.

4.4.1.2.14   Data Provider operational monitoring data items

35   We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

36   We feel that this section duplicates information already available to CDA (list of schemes per endpoint), the response times are reported elsewhere

37   The comment section is vague on wording, and it is unclear who 'providers' are (QDPS, data, other?) in this context.

4.4.1.2.15   Frequency

38   As previously mentioned, 15s frequency feels too frequent, especially with payload currently envisioned.

4.4.1.3   Question: Are there any technical barriers to you in supplying the reporting data?

Bravura is happy to push monitoring data via API.

4.4.1.4   Question: Are there any barriers to providing both the auditing and monitoring data feeds in mostly near real time?

Bravura is happy to push monitoring data via API in near real time.

4.4.1.5   Question: Management information and oversight data is to be provided daily. Do you have any alternative suggestions which would achieve our aims?

4.4.1.5.1   QDPS management information required

39   The scope of codes to be used and any additional information needed has not been fully defined, therefore we cannot provide an in-depth review.

40   As per other 'Event Types' the reason and usefulness of the concatenation of the code is unclear.

41   We suspect that bullet item 4 (number of acknowledgements…) would either be 0 or 1, but it would be useful for the standard to clarify this expectation to ensure consistency of metrics.

42   We believe that for bullet item 5 (…a user journey is not completed…) to be consistently reported then further definition of the 'end of a journey' needs to be defined in this standard.

4.4.1.5.2   QDPS management information data items

43   We recommend that for data element 1 this should be determined whether name or ID is used to ensure consistency.

44   We would suggest that more information is sought as to whether multiple metrics would be better supplied in the API call rather than repeated calls. We are considering both simplicity of implementation and relative load.

45   We feel that the final sentence is too vague relating to the provision of survey data.

4.4.1.5.3   Data provider management information required

46   We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

47   We believe it would be best to specify the period for which reporting is required and suggest that monthly is most applicable here.

4.4.1.5.4   Data provider management information data items

48   We think that this section needs to be clarified to be clear that where a data provider utilises a 3rd party ISP then this requirement sits with the ISP.

49   We recommend that for data element 1 this should be determined whether name or ID is used to ensure consistency.

50   The scope of codes to be used and any additional information needed has not been fully defined, therefore we cannot provide an in-depth review.

51 We believe it would be best to specify the period for which reporting is needed, and suggest that monthly is most applicable here, therefore time period is superfluous.

52 It is unclear what the time stamp would contain, therefore we suggest that this is clarified in a future edition.

4.4.1.5.5 Frequency

53 We feel that this section is at complete odds with information requested and specified in earlier sections.
    53.1 For example - if the data is supplied daily, why are there reporting periods and dates?

4.4.1.5.6 Oversight

54 We feel that many of our observations elsewhere also apply to this section – there currently exists potential for:
    54.1 Duplication of information
    54.2 Different assumptions made by all providers due to lack of clarity
- For example - for uptime overtime, should this be historical data on a rolling basis; or something else?

    54.3 Confusion over timeframes
- For example - for the average time to register a PEI within SLA, is this the average in the period between the start date and the end date? (e.g., the average PEI registration times between 01/09/2022 00:00:00 to 01/09/2022 23:59:59); or something else?

55 In Bravura's experience when looking at the number of complaints raised and processed this information is not held within a pensions administration system, therefore reporting for this may have to be more manual.
    55.1 Most firms have ancillary systems for their complaint handling and the connections between the central dashboard eco-structure and the pension data system (either with or without an ISP) are not connecting with these ancillary systems.
    55.2 The standards that we have been shown up until now from the PDP, all point to the connections between the data held in pension administration systems, and not any other systems that may be held in a firm's estate.
    55.3 Complaints would need to be determined through the pension firm's complaint handling process, whether they related to a dashboard complaint or not. This identification can also be somewhat subjective and may not be available within 24 hours.

56 We would suggest that complaint handling data is already provided to the relevant regulators on a prescribed basis, so rather than place this oversight data in the remit of the PDP, which would see significant implementation costs, our view is that this should have a section carved out in existing complaints data provision made directly by the pension firms themselves, without the intervention of the PDP.

4.4.1.6 Question: The transport method for data is to push data to an API housed on the central data architecture API gateway. Do you perceive any risks with this approach?

We are well versed with APIs, and don't foresee issues if this is suitably architected. However, as stated elsewhere in our response we are concerned about the scope and frequency of data being supplied and duplication in certain areas. To maintain efficiency, we recommend that this is further defined.

4.5 Technical

4.5.1 Overview guidance

4.5.1.1 Question: Do any of the proposed requirements pose a specific challenge for your organisation?

Bravura is used to working in these areas and therefore do not have any specific challenges outside of our specific consultation responses in specific areas.

4.5.2   API (Application Programming Interface) standards

4.5.2.1   Question: Are there any areas where further detail is needed?

As an emerging, experienced, and knowledgeable supplier of ISP and Pensions Dashboards software and services, the Bravura group are successfully implementing these APIs. However, there are several areas where added clarity and information is needed.

1   What type of consents can be expected in the consents token?
    1.1 In example - will it be find, register and retrieve consent?

2   It is not explicitly mentioned in the API Baseline doc or the technical standards on what the consents token should be used for. Can this be expanded?
    2.1 Our current assumption is that:
- In the find API, once PAT has been obtained, is there a need to check that the find consent is provided in the consents token, or is the expectation that PFS will only send through a find API to an ISP if the find consent has been provided by the user agent?

3   Clarity is needed around section 15.3 of the API-Baseline-Design document where it is stated that "Consents in this flow are assumed to permit Find and Register. If Register is not permitted, then the Data Provider could still contact its customer using its existing details as it knows that the customer is interested in their pension (but this is a business decision for the provider)." Therefore:
    3.1 Bravura's assumption is that if the find and register consent is not provided, that the ISP will not register the PeI.
    3.2 Also, it is within the ISP's remit to not proceed with the find in this case because the result cannot be registered with the C&A due to lack of consent.
    3.3 If these assumptions are not correct, then please clarify the standards document.

4   In the View API, a consents token is not included in the request. Introspection of the RPT must check for the permissions instead, but in the example, response provided in the API-Baseline-Design and technical standards published in July 2022, the introspect API's response does not provide much information of consent. Only whether the granted scope is "owner" or "delegate". How does the ISP determine if consent to retrieve has been given based on the response from the introspect API?

5   Bravura feels that it would be useful for the PDP to publish a sequence diagram for a scenario where a user performs another find through a different dashboard, or just initiates another find?
    5.1 Further queries on this are:
- Will C&A perform a check for existence of the PeI for the user token and return the data or will the ISP be expected to initiate another find request using a different user token?
- Is there an expectation for the ISP to identify that the user token has already done an initial find, and return the PeI that has already been registered again? Or should an appropriate status code be returned as part of the find API response?

6   We have found some inconsistency in the guide with regards to how the PeI should be structured:
    6.1 In the example of for the Create resource request for registering the PeI, the structure of PeI does not have a prefix "urn:" as shown below: -
- "name":   "pei:0e55140a-87d3-41cf-b6f7-bc822a4c3c3b:6e29eeb8-814c-44a6-a43f-b4830f3f4590",
    6.2 However, in defining the format of PeI in section 16.3 in PDP Technical Standard doc, the prefix "urn:" is present in definition as well as in example:
- URN of the form: 'urn:pei:'<holder-name GUID>':'<asset GUID>.
  - E.g.   urn:pei:f1c72611-438b-4f72-a4b5-ec7e69000c31:8ff2063a-48bd-4ed7-bcf8-7c3b8f89626d

7   We have found inconsistency between the guides, as detailed:
    7.1 In the section 2.2. Procedural service standards : CoCo2.2.1 of the PDP-Code-Of-Connection document published July 2022, it is stated that:- "when in response to a find request you identify a match (whether possible or confirmed), when registering the PeI, you must provide PDP with the reason for registration, i.e. whether it is a possible or confirmed match. [Note: it is TBC whether you will only need to record this in your audit logs, or whether this will involve re-registering a PeI with PDP when a possible match becomes a confirmed match]".

7.2 However, in Section 7 Register PeI API of PDP-Technical-standards published July 2022, does not provide any specific field for passing that Partial/Full match information to the PDP at the time registering the PeI or updating it. Can this be provided within the standards or removed?

7.3 We are also not clear of the exact purpose of the 'Description' field, whether or not it would be used to give Partial/Full match information - the same section of the tech doc as mentioned above suggests it might be used for human readable form of the Pension identifier giving info about Pension scheme/product/provider etc. Clarity in the user cases for this should be provided.

8 In cases where a Pension resource becomes (PeI) non-relevant the section 2.2. Procedural service standards : CoCo2.2.2 & CoCo2.2.3 of the PDP-Code-Of-Connection document published July 2022 suggest to: de-Register the PeI as soon as possible if a valid PAT exists AND immediately cease serving view data for any view requests against that PeI.

8.1 When "Immediately ceasing serving view data for any view requests against that PeI" it is not clear from the API technical documents and standards what is the standard response code & message we need to send back to the Dashboard.

4.5.2.2 Question: Do the proposed service levels seem deliverable for your organisation?

Bravura have commented elsewhere in our consultation response that we feel the current service levels are inhibiting of innovation and the provision of real-time information. Rather than repeat ourselves here, we only deal with a technical query.

9 We feel that 2 seconds to return a response for the view request may be challenging or impossible where further token introspection and real time calculations are required.

4.5.3 Technical (other)

4.5.3.1 Question: Do the proposed timeframes seem reasonable?

Bravura has nothing to comment here that we have not already covered elsewhere, in that the view API turnaround seems overly optimistic and will impede innovation and outcomes for dashboards users.

4.5.3.2 Question: Is there any more guidance you need in relation to these requirements?

1 We have had to 'work out' certain areas as there is a lot of 'tacit knowledge', this may become difficult for CDA/PDP to contend with as more endpoints come online and find that their assumptions are not correct. Bravura believe that it would be prudent to improve the documentation, test harnesses and examples of APIs and tokens to help developers.

1.1 For example, the technical standards provide some examples of the requests that may be sent, however in a lot of cases, these examples contain masked data that have been encoded using JWT. To understand what will be made available in the request payload, it would be useful to provide more examples in the guideline which contain plain text examples (but with a note stating that the payload will be encoded in the test and production payload).

1.2 When we need to send the pensions data back to the calling Dashboard directly for a JWT token in response of a successful View request, we need more information in the JWT structure pertaining the Headers and claims to use as part of the JWT encoding.

4.6 Early connection

4.6.1 Early connection guidance

4.6.1.1 Question: Do you consider the notification requirement to be reasonable?

Bravura believes that the notification requirements are reasonable. However, more information is needed around the proposed process for rejected applications. Should an ISP wait for the official window for a pension provider (not early connection) to register them?

4.6.1.2 Question: Do you consider the minimum requirement for at least a month's extension (for schemes with an existing date) to be reasonable?

Based on available information, Bravura believes that this is acceptable.

4.7 Governance

4.7.1 Setting standards

4.7.1.1 Question: Do you have any comments on the change process and timeframes?

1 The change process approach seems to be acceptable, however, some further information would be useful, in particular:

    1.1 Based on these documented processes, we assume that, say, a major change that is expected to be live in October 2024 the standard will be final, complete, and published by October 2023? If this is not correct, then the process will need to be clearer.

    1.2 Where a minor change is required in April 2025 the standard will be final, complete and published by October 2024?

    1.3 A full process for testing and implementing these changes (for data providers, QPDS's and ISPs) is required to ensure all providers are clear on timeframes and responsibilities.

    1.4 Deprecation and compatibility – we are a little unclear how this will work in practise and think a timeline and some further examples will help providers to understand this further.

4.7.1.2 Question: Do you agree with our definitions of major and minor changes to the standards?

We believe that, subject to minor changes being accurately assessed as such, the definitions seem sensible.

4.8 Consultation Document

4.8.1.1 Question: Are your clear on the differences between standards, statutory guidance, and recommended practice?

Yes, this is clear. However, it would be helpful to collocate documentation (which can become unwieldy), so we suggest looking at providing combined web pages (or PDFs, but web pages (akin to FCA's COBS handbook)) with all related information in the same place so that cross referencing becomes more user friendly and the opportunity for being overlooked is reduced.

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