PASA Dashboards Working Group

Dashboards Toolkit: Post Use Behaviour

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Produced in partnership with:

Lumera

PASA Experts for Dashboards

PASA

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1. Introduction

PASA's Compliance Monitoring Guidance focuses on the monitoring required under the pensions dashboards regulations and how trustees can demonstrate they're meeting their regulatory duties. Alongside this, trustees, scheme managers, administrators and regulators will also need to understand how member behaviour changes once dashboards are available, and whether any emerging trends require further action.

This toolkit outlines the types of reporting which may be helpful, considers whether the information is likely to be available from existing reporting, and explains why each measure may be useful. TPR and Money and Pensions Service (MaPS) are keen for administrators and providers to capture this information. Over time, this should provide valuable insight into whether dashboards are meeting their stated objectives and how they're influencing member behaviour in relation to pensions. It will assist administrators to:

- Understand user behaviour
- Identify any impact on BAU processes
- Provide high-quality updates to trustees
- Assess whether further cost discussions may be needed

TPR guidance reinforces why this is important as follows:

> "This will enable you to better understand your members' experience and identify potential areas of non-compliance or need for improvement. This will also help you understand if there are systemic issues which may have a wider impact for the running of your scheme."

Where possible, the industry should aim to adopt a consistent approach to this additional reporting. This will help demonstrate the impact of pensions dashboards on member engagement over time, support regulatory oversight and help providers understand why different schemes may experience different outcomes.

For schemes offering more than one benefit type, such as DB and DC, reporting should be separated by benefit type and member status, where possible. Further suggestions for more detailed reporting are included in the "Additional information which could be considered". These may help schemes, providers and regulators understand whether dashboards are meeting their objectives and whether member behaviour is changing.

The measures below aren't intended to create a new mandatory reporting standard. They're designed to support consistent industry monitoring, help schemes understand the operational impact of dashboards, and provide insight into how member behaviour may change over time. Administrators should use existing reporting wherever possible and develop additional reporting proportionately, based on scheme type, benefit structure and available data.

2. Types of Reporting

MEASURE
Change in number of completed transfer payments

Why this matters

An increase in completed transfer payments may indicate changing member behaviour and, in some cases, increased scam risk. For occupational DB schemes, transfer volumes may also be relevant from a funding perspective.

Tracking this information will help the industry understand the additional work generated by dashboards and support future resourcing plans.

Likely availability from existing reporting

Most administrators report the number of transfer cases completed in their regular governance reporting. Where this isn't already provided, a graph could be included which would demonstrate any significant change in the number of transfer cases completed.

Additional information to consider

Where possible, reporting could also identify the number of transfers which were refused, and completed transfers which were:

- Categorised as red flag cases under the transfer regulations
- Transfers to overseas schemes, including:
- Average transfer value
- Average age of members transferring

Proven scam cases are expected to be rare and should continue to be reported to trustees individually.

MEASURE
Change in number of transfer out quotations

Why this matters

An increase in transfer quotation requests may indicate dashboards are prompting members to engage with deferred or forgotten pensions. It may help identify increased scam risk and changing operational demand.

Likely availability from existing reporting

Most administrators report the number of transfer quotations provided in their regular governance reporting.

Where this isn't already, provided a graph could be included which would demonstrate any significant change in the number of transfer quotations provided.

Additional information to consider

- Whether the request was initiated and/or responded to online
- Whether the member would previously have been considered 'lost'
- Average transfer value, to help understand the behaviour of members with small pots
- Average age of members requesting transfer quotations

Where possible, reporting could separately identify quotations for members who would previously have been considered 'lost' under the Pensions Policy Institute (PPI) definition below.

MEASURE
Change in number of completed retirement settlements.
For DC members this will include UFPLS, annuities and, where identifiable, members moving funds into drawdown.

Why this matters

This may indicate whether dashboards are encouraging members to engage with and act on their pension benefits. For occupational DB schemes, retirement settlement volumes may be relevant from a funding and cashflow perspective.

Likely availability from existing reporting

Most administrators report the number of retirement cases completed in their regular governance reporting.

Where this isn't already provided, a graph could be included which would demonstrate any significant increase or decrease in the number of retirement cases completed.

Additional information to consider

Details of completed retirements could include whether:

- The case was Initiated and/or responded to online
- The member would previously have been considered 'lost' under the PPI definition below
- The member engaged with guidance, support or advice before settlement, where this is known

MEASURE

Change in number of retirement quotations.

For DC members, this could include requests relating to UFPLS, annuities and drawdown, where this information can be identified.

Why this matters

Retirement quotation volumes may indicate whether dashboards are prompting members to explore retirement options, even where this doesn't immediately result in settlement. This may help schemes understand changing engagement patterns and future operational demand.

Likely availability from existing reporting

Most administrators will report the number of completed transfers in through regular governance reporting. Where this isn't already provided, a simple trend graph could help identify any significant change in volumes.

Additional information to consider

Splitting completed transfers in by age, pot size and source scheme type may help indicate whether consolidation is occurring among younger members, older members or members with smaller pots.

MEASURE

Change in number of completed transfers in

Why this matters

This may indicate whether pensions dashboards are encouraging members to consolidate DC pots

Likely availability from existing reporting

Most administrators will report the number of transfers in completed in their regular governance reporting. Where this isn't already provided a graph could be included which would demonstrate any significant change in the number of transfer in cases completed.

Additional information to consider

Details of the number of transfer in cases completed split by age would indicate whether consolidation is happening at the older or younger age population

MEASURE
Change in number of transfers in enquiries.

Why this matters

This may indicate whether dashboards are encouraging members to consider consolidation, even where this doesn't immediately result in a completed transfer.

Likely availability from existing reporting

Most administrators will report the number of transfers in enquiries received in their regular governance reporting. Where this isn't already provided a graph could be included which would demonstrate any significant change in the number of transfer in enquiries.

Additional information to consider

Details of the number of transfer in cases completed split by age would indicate whether consolidation is happening at the older or younger age population.

MEASURE
Change in volumes of other transaction types, such as:

- Switching investment funds, for example from the default fund to a more targeted fund
- Increasing contributions
- Updating personal details

Why this matters

This may help indicate how member behaviour is changing in response to dashboards. It may also show whether dashboards are prompting members to update personal information, supporting improvements in member data.

Likely availability from existing reporting

Most administrators will already track this information, although it may not be possible to identify which changes arise directly from dashboard use. Even so, trend reporting may help identify changes in member behaviour over time.

Additional information to consider

N/A

MEASURE

Change in number of members seeking further information. Reporting could be split by:

- Channel used, e.g. phone, website, email or secure message
- Reason for the query
- Whether the query has arisen because the member didn't understand information shown on a dashboard
- Whether the enquiry relates to a member who would previously have been considered 'lost' under the PPI definition below

Some of this information may overlap with the compliance monitoring requirements set out in PASA's separate Compliance Monitoring Guidance.

Why this matters

This may indicate whether dashboards are increasing member engagement and creating additional operational demand. Over time, it may help the industry identify common areas of misunderstanding and develop targeted support, FAQs or communications.

Likely availability from existing reporting

Most administrators already report enquiry volumes through regular governance reporting. Where this isn't already provided, trend reporting could help identify significant changes in volume, channel or query type.

Additional information to consider

Where administrators can segment enquiries by reason, this data should be captured to identify recurring themes. This could help the industry develop further support, including standard FAQs and suggested responses.

MEASURE
Enquiries from members where no dashboard record is returned, either because no liability can be found or because a 'no liability' record exists, for example where the member has transferred out or received a refund of contributions.

Why this matters

This may indicate whether dashboards are increasing member engagement and creating additional operational demand. Over time, it may help the industry identify common areas of misunderstanding and develop targeted support, FAQs or communications.

Likely availability from existing reporting

This measure will help identify whether dashboards are generating enquiries from members who believe a pension is missing. It may also indicate whether members are misunderstanding information shown on dashboards, particularly where the relevant pension is already visible or already in payment.

Additional information to consider

It would be helpful to capture the outcome of these enquiries, particularly where the member's benefits are already in payment. This may indicate whether in-payment benefits are sufficiently prominent or clearly explained on dashboards.

MEASURE
Vulnerable members

Why this matters

Dashboards may lead to increased engagement from members with vulnerable characteristics or members who need additional support.

Likely availability from existing reporting

Some administrators may already report this information. Where they don't, consideration should be given to how members needing additional support can be identified appropriately and sensitively, and whether an indicator can be captured to support separate reporting.

Additional information to consider

Any reporting should be consistent with the scheme's approach to vulnerability, data protection requirements and existing member support processes.

*For the purposes of this toolkit, references to a 'lost' pension or pot are based on the PPI definition:

A pension where the provider or administrator is unable to contact the member.

This may include cases where:

- Written communications have been returned as 'not at this address' or 'return to sender'
- The member has not updated their address or contact details
- The account is treated by the providers or administrator as a 'gone away' record

MEASURE
Fraud cases.

Why this matters

There's a concern dashboards could create new opportunities for fraud or scams, even if the overall incidence is expected to remain low. Monitoring potential and actual fraud cases among relevant members will help identify whether any trends are emerging.

Likely availability from existing reporting

Administrators typically deal with actual and potential fraud cases individually, and this is expected to continue. This metric is intended to identify whether administrators are seeing any wider increase in fraudulent activity across the industry.

Additional information to consider

Reporting red flag transfer cases separately from other transfer out cases may provide greater insight into whether members are being exposed to increased risk.

Reporting is the best defence against pension scams

You should report any knowledge or suspicions of pension scams and those involved. You should report if:

- you believe a scam has already happened
- a red flag is raised when making a transfer
- you suspect that a pension scam is taking place or are suspicious of those involved: this may be because of other risks you have noticed such as amber flags in a transfer request

In England, Northern Ireland and Wales you should report fraud or concerns about a potential scam to Report Fraud.

If you live in Scotland, you should call Police Scotland on 101 or Advice Direct Scotland on 0808 164 6000.

Get in touch:
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www.pasa-uk.com