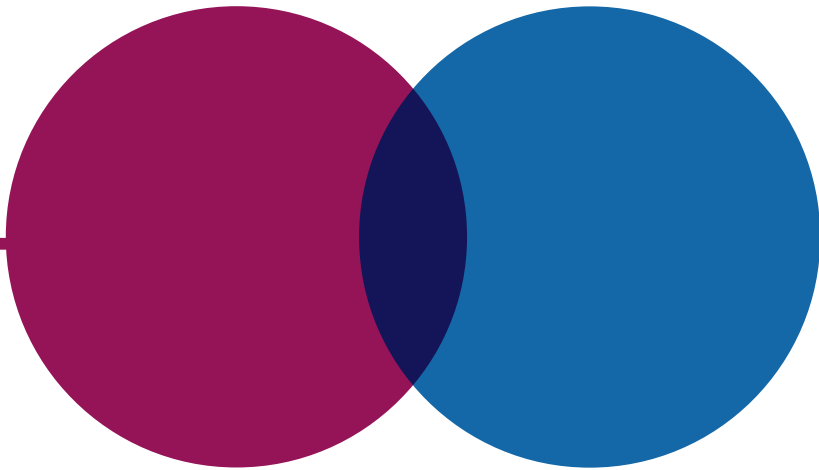




National Audit Office




REPORT

# Investigation into the Pensions Dashboards Programme

Department for Work & Pensions

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SESSION 2023-24  
10 MAY 2024  
HC 732



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National Audit Office

# Investigation into the Pensions Dashboards Programme

**Department for Work & Pensions**

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## **Report by the Comptroller and Auditor General**

Ordered by the House of Commons  
to be printed on 8 May 2024

This report has been prepared under Section 6 of the  
National Audit Act 1983 for presentation to the House of  
Commons in accordance with Section 9 of the Act

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**Gareth Davies**  
**Comptroller and Auditor General**  
**National Audit Office**

**2 May 2024**

## Investigations

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## Key facts

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**31 Oct  
2026**

mandatory deadline for pension providers and schemes to connect to the Pensions Dashboards Programme's (PDP's) digital architecture, one year later than the final connection deadline in the original staged timetable

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**£289mn**

estimated cost in cash terms to the Money and Pensions Service of delivering the PDP from 2019-20 to 2031-32

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**£413mn**

estimated gross discounted benefits of the PDP from 2022-23 to 2031-32

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**Not yet decided** when pensions dashboards will be available to the public

**£59 million** spending on the PDP from April 2019 to March 2024

**£688 million** estimated cost to the pensions industry of delivering pensions dashboards from 2022-23 to 2031-32

**16.3 million** estimated number of potential users of pensions dashboards in steady state, used to estimate the benefits

**£26.6 billion** estimated value of lost pension pots in 2022

## What this investigation is about

- 1** Pensions dashboards are intended to allow people to view information about their pensions – including State Pension – online, securely and in one place. The Department for Work & Pensions (DWP) expects that pensions dashboards will deliver significant benefits by supporting people to plan better for retirement and make more informed financial decisions. They will also help people connect with ‘lost’ pension pots, meaning that fewer people will miss out on their entitlements.
- 2** The Pensions Dashboards Programme (PDP) is one of DWP’s programmes in the Government Major Projects Portfolio. DWP is responsible for policy relating to pensions dashboards. It has delegated responsibility for delivering the PDP to one of its arm’s-length bodies, the Money and Pensions Service (MaPS). The purpose of the PDP is to design and implement the digital architecture needed to make pensions dashboards work across the UK, allowing private sector providers to develop their own dashboards and government to develop a non-commercial dashboard. The digital architecture will connect pension providers and schemes with dashboards, enabling the flow of data between them so that users can search for and receive accurate pensions information.
- 3** The first deadline for pension providers and schemes to connect to the digital architecture was 31 August 2023 but, due to delivery problems, in March 2023 the Minister for Pensions announced that the programme would be reset. This was to allow more time to deliver the digital architecture and facilitate the connection of pension providers and schemes.
- 4** In summer 2023, we received Parliamentary correspondence asking us to consider investigating the delays in the delivery of the PDP. In autumn 2023, after reviewing documents and discussing the programme with DWP officials, we decided there would be value in undertaking an investigation into the delivery of the PDP, focusing on events since 2019 when DWP decided to delegate responsibility to MaPS.
- 5** A separate programme, which sits alongside the PDP, is responsible for delivering the user interface for the government dashboard through which users will be able to access their pensions information. Our investigation did not cover this programme.

6 This report covers:

- the purpose of pensions dashboards and how the PDP was set up (Part One);
- the progress DWP and MaPS have made in delivering the PDP, and the problems with implementation (Part Two); and
- the progress DWP and MaPS have made in resetting the PDP, and the main changes that have resulted from the process (Part Three).

Details of our investigative approach are set out in Appendix One. Our work was not designed to assess the value for money of the PDP.



# Summary

## Key findings

Timetable, costs and benefits

**7 Pension providers and schemes are required to connect to the Pensions Dashboards Programme's (PDP's) digital architecture by 31 October 2026, one year later than the final connection deadline in the original staged timetable.**

There were originally 23 separate staging deadlines for connecting to the digital architecture depending on pension schemes' size and type. The first deadline was 31 August 2023 and the last deadline was 31 October 2025. Due to delays in delivering the programme, in June 2023 the Pensions Minister laid amending regulations that replaced the staged timeline with a single mandatory connection deadline of 31 October 2026. In March 2024, the Department for Work & Pensions (DWP) published a revised staging timetable in guidance to mitigate the risk that a large proportion of pension providers and schemes choose to connect close to the deadline, which could create capacity challenges for the PDP. Providers will be required to have regard to the guidance, including the timetable, but the dates will not be legally binding. DWP has not yet specified when pensions dashboards will become available to the public but, due to the later connection deadline, this is expected to be later than previously expected (paragraphs 1.18, 1.19 and 3.11 to 3.14 and Figure 4).

**8 The estimated cost of the PDP has risen from £235 million in 2020 to £289 million in 2023, an increase of 23%.** A range of factors have led to the estimated cost of the programme increasing in cash terms by £54 million. These include an increase in supplier costs, changes to the Money and Pensions Service's (MaPS's) underlying costing assumptions, and the period covered being extended by two years to 2031-32. Connections to the digital architecture are scheduled to be completed in 2026-27, after which MaPS will transition the programme to business as usual. From April 2019 to March 2024, MaPS spent £59 million on the PDP. It categorised expenditure on the PDP in 2022-23 as capital spending, meaning it was used to develop new infrastructure rather than for running costs, but is not intending to do the same for the majority of spending in 2023-24. This indicates that most of the spending did not result in further development of the digital architecture but was instead used to maintain the platform and services during the reset process (paragraphs 1.21, 3.15, 3.16 and 3.18 and Figure 5).

**9 MaPS estimates that the PDP will generate £413 million in benefits, based on an assessment of how much people would be willing to pay for a pensions dashboard and the value of lost pension pots recovered.** MaPS first estimated the financial value of the benefits of the PDP in the 2022 outline business case. Although users will not have to pay to access pensions dashboards, it calculated the benefits using an estimate of the average price a user would be willing to pay annually for a dashboard (informed by research carried out by Ipsos MORI) and the estimated value of recovered pension pots. This resulted in a gross discounted benefit figure of £437 million, assuming that the dashboards service would be available from October 2024 and that there would be 16.3 million potential users in steady state. MaPS now estimates programme benefits at £413 million, assuming that dashboards become available in November 2026, a decrease of 5% on its original assessment. These benefits cover the period from 2022-23 to 2031-32. The estimated net present social value – or net benefit – of the programme has also decreased, from £268 million to £211 million, due to the increase in costs and decrease in gross benefits. MaPS remains confident that the programme represents value for money (paragraphs 1.23, 1.24 and 3.19).

#### Arrangements for delivering the PDP

**10 DWP did not have assurance that MaPS had the capacity and capability it would need to deliver the PDP, but expected MaPS would be able to build up its resources.** In 2019, DWP announced that MaPS, one of its arm’s-length bodies, would be responsible for leading the delivery of pensions dashboards. DWP concluded that MaPS was best placed to deliver the PDP for a range of reasons, and the MaPS board was content to accept responsibility for delivery. DWP considered that using MaPS would allow work to start sooner than if it had to create a new body for this purpose. It also considered that delivering pensions dashboards fitted well with MaPS’s objective to support members of the public to make informed financial decisions. In addition, MaPS had access to industry funding through two existing levies. DWP did not have assurance at the outset that MaPS had the capacity and capability to deliver a major digital programme such as the PDP, but told us it had expected that MaPS would be able to build the capability it needed (paragraphs 1.5 to 1.7).

**11 DWP's oversight of the PDP was led by its policy and corporate sponsorship teams, with limited input from digital and programme management experts.**

MaPS has its own accounting officer who is accountable to Parliament, and a board that is accountable to DWP. DWP's departmental accounting officer remains ultimately accountable to Parliament for MaPS's performance. The main way that DWP monitored MaPS's progress in delivering the PDP was through participating in programme governance arrangements. A senior official from DWP's pensions policy team was a member of the programme board. In addition, senior DWP officials attended the sub-committee of the main MaPS board, which had delegated authority to direct the work of the PDP and hold it to account. DWP also monitored MaPS's progress on the PDP through quarterly accountability reviews, which are routine monitoring meetings that DWP holds with the executive team of each of its arm's-length bodies, covering all aspects of the body's performance. In addition, DWP's accounting officer had regular meetings with MaPS's chair and chief executive at which the PDP and other issues were discussed. DWP told us that its sponsorship teams were the main contact for MaPS and it aimed to draw in wider expertise as necessary to monitor progress and provide support. It also said it was mindful of MaPS's autonomy as an arm's-length body and did not want to intervene in a way that would have compromised this (paragraphs 1.5, 1.10 and 1.25 to 1.28).

Progress in delivering the PDP

**12 Between 2020 and mid-2022, DWP and MaPS made progress in delivering important elements of the pensions dashboards system.** The work completed during this period included the following elements:

- **Establishing the statutory framework and drafting standards for pensions dashboards.** After the Pension Schemes Act was passed in February 2021, DWP developed regulations which, among other things, empowered MaPS to set standards for pensions dashboards. The standards will set out requirements in areas such as data formatting and dashboard design. By the end of 2022, MaPS had published draft versions of all the standards. It plans to submit final versions to the Secretary of State for approval in February 2025.
- **Appointing a supplier to deliver the digital architecture.** In January 2021, the Crown Commercial Service confirmed that MaPS could use its chosen framework to procure its main supplier. The framework was set to expire in September 2021, meaning MaPS had to carry out the procurement at pace. It issued an invitation to tender to the 72 suppliers working under the framework but received only one bid. In September 2021, MaPS signed a five-year contract with Capgemini, worth £44 million, with the option to extend for a further two years.
- **Developing and testing the digital architecture.** In autumn 2021, MaPS began working with Capgemini and its subcontractor to build the digital architecture and test its functionality with volunteer pension providers and schemes, as well as commercial dashboard providers (paragraphs 2.2 to 2.14).

**13 Until December 2022, DWP and MaPS took the view that the risks identified, including by the Infrastructure and Projects Authority (IPA), would not have a significant impact on the PDP's overall delivery timetable.** As a major digital programme, the PDP was subject to a series of reviews which assessed progress. Having sufficient capacity and capability was highlighted as a risk to successful delivery.

- In September 2020 and July 2021, the IPA awarded the PDP an 'amber' delivery confidence rating, meaning that successful delivery appeared feasible but significant issues existed requiring management attention. The IPA made recommendations for improvements in a variety of areas including governance, resourcing and skills, programme management and commercial approach, which MaPS took action to address.
- In July 2022, the IPA awarded the PDP a 'red' delivery confidence rating, indicating that successful delivery appeared unachievable. This followed a mock 'service standard assessment' by DWP's digital team, which found that the programme did not meet 12 of the 14 standards.<sup>1</sup>
- In October 2022, MaPS assured DWP, including through an exchange of letters between DWP's accounting officer and the chair of MaPS, that the delay in passing the service standard assessment would not have a significant impact on the PDP's overall delivery timetable. It did, however, highlight risks that would affect delivery if they were not addressed, including a lack of skilled resources. DWP told us it supported MaPS to strengthen its technical expertise (paragraphs 2.16 to 2.21).

**14 In December 2022, MaPS told DWP that the PDP's delivery timetable was no longer viable.** In November 2022, the Central Digital and Data Office carried out a formal service standard assessment, which found that the PDP still did not meet seven of the 14 standards. In light of this, MaPS told DWP it would be unable to carry out early live testing of pensions dashboards or connect pension providers and schemes by 31 August 2023, the first deadline set in the regulations. It proposed that the connection timetable should be extended by at least six months (paragraphs 2.22 and 2.23).

<sup>1</sup> A service standard assessment is a process managed by the Central Digital and Data Office and is designed to ensure that government services are built to a good standard. It requires services to meet 14 standards by demonstrating, for example, that the service is accessible and easy to use.

**15 In February 2023, a review by DWP concluded that multiple factors had contributed to the delivery problems, including a lack of skilled resources and ineffective programme governance.** After MaPS advised DWP that it could not meet the PDP's timetable, DWP undertook an assurance review to assess delivery confidence and the viability of the delivery plan. The review awarded a 'red' rating and identified a series of contributing factors. These included: a lack of resources, skills and experience across all levels of the PDP; ineffective and complex programme governance, including insufficient scrutiny and challenge by the programme board; and a lack of robust contract and performance management arrangements that hampered MaPS's ability to oversee the supplier effectively. Several of the issues DWP identified had been raised in the IPA's assurance reviews in 2020 and 2021 (paragraphs 2.16 and 2.24 to 2.26).

#### Progress in resetting the PDP

**16 During the reset process, DWP and MaPS have made progress in addressing the underlying issues that led to the reset.** In March 2023, the Pensions Minister announced that extra time was needed for the PDP to deliver the digital architecture and facilitate the connection of pension providers and schemes. She confirmed that the programme was being reset. Since then, among other things, MaPS has completed a technical review of the design of the digital architecture to confirm that it meets the programme's requirements, revised the PDP's delivery plan, and improved how it works with its supplier, Capgemini. In addition, MaPS has designed a new governance structure for the PDP. The changes are intended to improve decision-making, enable more effective working with key stakeholders, and support better DWP oversight of progress (paragraphs 2.30, 3.5 and 3.8 to 3.10).

**17 MaPS has made progress against the criteria it needs to satisfy before the PDP can leave reset, including appointing a new senior responsible owner for the programme.** At the time of our work, the PDP was in the final stage of the reset process. In April 2024, MaPS announced that it had appointed a new senior responsible owner with the necessary digital technology experience to lead the rest of the programme. In addition, as part of ensuring it has the capacity and capability to deliver, MaPS has agreed with DWP the level of ongoing support that DWP will provide. DWP and MaPS told us they expect to consider in May 2024 the PDP's readiness to leave reset (paragraphs 3.5 and 3.6).

**18 DWP and MaPS have begun to make changes in response to lessons from the PDP, focusing particularly on DWP's relationship with its arm's-length bodies.**

DWP's assurance review of the PDP identified a range of lessons for DWP, including clarifying accountabilities with arm's-length bodies on programme delivery and ensuring that DWP's functions, such as digital, provide adequate support. The assurance review also noted that DWP needs to consider how bodies could be appropriately supported while still allowing them to deliver at arm's length. DWP is taking action in response to the lessons, including strengthening arm's-length bodies' links to its governance arrangements, such as the departmental change portfolio board and the investment committee. DWP told us that, in making changes, it is mindful of not overriding arm's-length bodies' autonomy. In line with the lessons, MaPS has modified its approach to scrutinising business cases and, as part of the reset process, has revised the PDP's governance (paragraph 3.21).

# Part One

## Setting up the Pensions Dashboards Programme

**1.1** This part of the report covers the purpose of pensions dashboards and how the Pensions Dashboards Programme (PDP) was set up.

### **Pensions dashboards**

**1.2** The concept of pensions dashboards has existed for some time, with government and the pensions industry recognising their potential value. However, historically it proved difficult to make dashboards a reality, with issues such as technological challenges and data quality concerns contributing to slow progress. In 2016, the Financial Advice Market Review recommended that HM Treasury should challenge the financial services industry to make a pensions dashboard available to consumers by 2019, bringing together industry and consumer representatives to help them set direction and drive progress.<sup>2</sup> In the subsequent Budget, the government announced it would ensure that the industry designed, funded and launched a pensions dashboard by 2019.<sup>3</sup> HM Treasury sponsored an industry-led project to develop a dashboard prototype in order to test the feasibility of the concept.

**1.3** The purpose of pensions dashboards is to enable people to access information about their retirement savings online, securely, and in one place. Most people build up a State Pension entitlement and multiple occupational or workplace pensions during their working lives. In 2024, analysis estimated that, on average, 18-year-olds will accumulate five pension pots by the age of 68.<sup>4</sup> People can find it hard to keep track of their entitlements. Research for the Association of British Insurers in 2021 found that half of the public struggle to find their pensions information, rising to nearly six in 10 younger people.<sup>5</sup>

<sup>2</sup> HM Treasury and Financial Conduct Authority, *Financial Advice Market Review: Final report*, March 2016.

<sup>3</sup> HM Treasury, *Budget 2016*, March 2016.

<sup>4</sup> Analysis by the Centre for Economics and Business Research, on behalf of PensionBee, March 2024.

<sup>5</sup> Association of British Insurers, *Pensions Dashboards Consumer Research*, December 2021.

**1.4** The government believes that having a comprehensive overview of their pensions will make it easier for consumers to plan for retirement and make more informed financial decisions. Its goals for pensions dashboards are to:

- increase individual awareness and understanding of pensions information;
- build a greater sense of control and ownership over pensions;
- enable people to access pensions information at a time of their choosing;
- increase engagement, with more people (regardless of their pension wealth) taking advantage of the available impartial guidance and financial advice; and
- help individuals connect with ‘lost’ pension pots, so that fewer people miss out on their entitlements. In 2022, the Pensions Policy Institute estimated that more than 2.8 million pension pots, worth a total of £26.6 billion, were considered lost.

### **Delivery arrangements**

**1.5** The Department for Work & Pensions (DWP) is responsible for policy relating to pensions dashboards. In 2019, after the conclusion of its industry-wide consultation, DWP announced that the Money and Pensions Service (MaPS) – at the time known as the Single Financial Guidance Body – would be responsible for leading the delivery of pensions dashboards.<sup>6</sup> MaPS is an arm’s-length body, sponsored by DWP. It has its own accounting officer who is accountable to Parliament, and a board which is accountable to DWP. The board is led by the chair who is responsible to the Secretary of State. The board’s responsibilities include supporting the executive and holding it to account, and ensuring appropriate governance and accountability arrangements are in place. DWP’s departmental accounting officer remains ultimately accountable to Parliament for MaPS’s performance.<sup>7</sup>

**1.6** DWP concluded that MaPS was best placed to lead the delivery of pensions dashboards for a number of reasons, and the MaPS board was content to accept responsibility for delivery. DWP told us that it did not have capacity itself to take on the programme and considered that using MaPS would allow work to start sooner than if it had to create a new body for this purpose. It also considered that delivering pensions dashboards fitted well with MaPS’s objective to support members of the public to make informed financial decisions. In addition, MaPS had access to industry funding through its existing levy income (see paragraph 1.15).

<sup>6</sup> The Single Financial Guidance Body was formed in October 2018 and took on the responsibilities of three previous bodies – the Money Advice Service, the Pensions Advisory Service and Pension Wise. It was renamed the Money and Pensions Service in April 2019.

<sup>7</sup> A framework document, agreed between DWP and MaPS in 2021, sets out the broad framework within which MaPS operates, including the governance and accountability arrangements.



**1.7** DWP did not have assurance at the outset that MaPS had the capacity and capability to deliver a major digital programme of the kind that would be required to implement pensions dashboards. MaPS itself assessed its ability to recruit the required level of resource as high risk. DWP told us it had expected, however, that MaPS would be able to build the capability it needed.

**1.8** From the start of the programme, DWP supported MaPS by seconding a number of individuals with policy, change, commercial and digital expertise. MaPS did not have an arrangement with DWP or access to a call-off contract to source skilled resources quickly to fill short- to medium-term gaps. DWP told us that its approach is to consider requests for support from arm's-length bodies on a case by case basis. Our 2021 report on *The challenges in implementing digital change* highlighted the importance of ensuring that a digital programme has the right mix of capability before it moves into the delivery stage.<sup>8</sup>

**1.9** MaPS initially created an industry delivery group to oversee delivery of pensions dashboards. It later replaced this with a new directorate, responsible for managing the PDP. It appointed a part-time senior responsible owner with strong links to the pensions industry who had overall responsibility for delivering the programme, and set up a programme board to make decisions, support the senior responsible owner and oversee progress. It also established a steering group that included industry representatives to help set the strategic direction of the programme.

**1.10** With the aim of ensuring it had sufficient oversight of programme delivery, MaPS established a sub-committee of its board. The sub-committee was attended by both non-executive and executive directors, and had delegated authority from the main board to direct the work of the PDP and hold it to account. More widely, a portfolio committee comprising representatives from the various organisations involved in delivering pensions dashboards, including MaPS, DWP, the Financial Conduct Authority and The Pensions Regulator, was set up with a focus on cross-cutting dependencies and risks to delivery.

## **Purpose of the PDP**

**1.11** The purpose of the PDP is to design and deliver the technical architecture that will underpin pensions dashboards. This is needed to enable private sector providers to develop their own dashboards and government to develop a non-commercial dashboard. The central digital architecture will connect pension providers and schemes with dashboards, enabling the flow of data between them so that users can search for and receive accurate pensions information. The architecture consists of four separate elements that must be brought together: the identity service, the consent and authorisation service, the governance register, and the pensions finder service. The PDP is also responsible for delivering the standards and governance arrangements needed to allow dashboards to work.

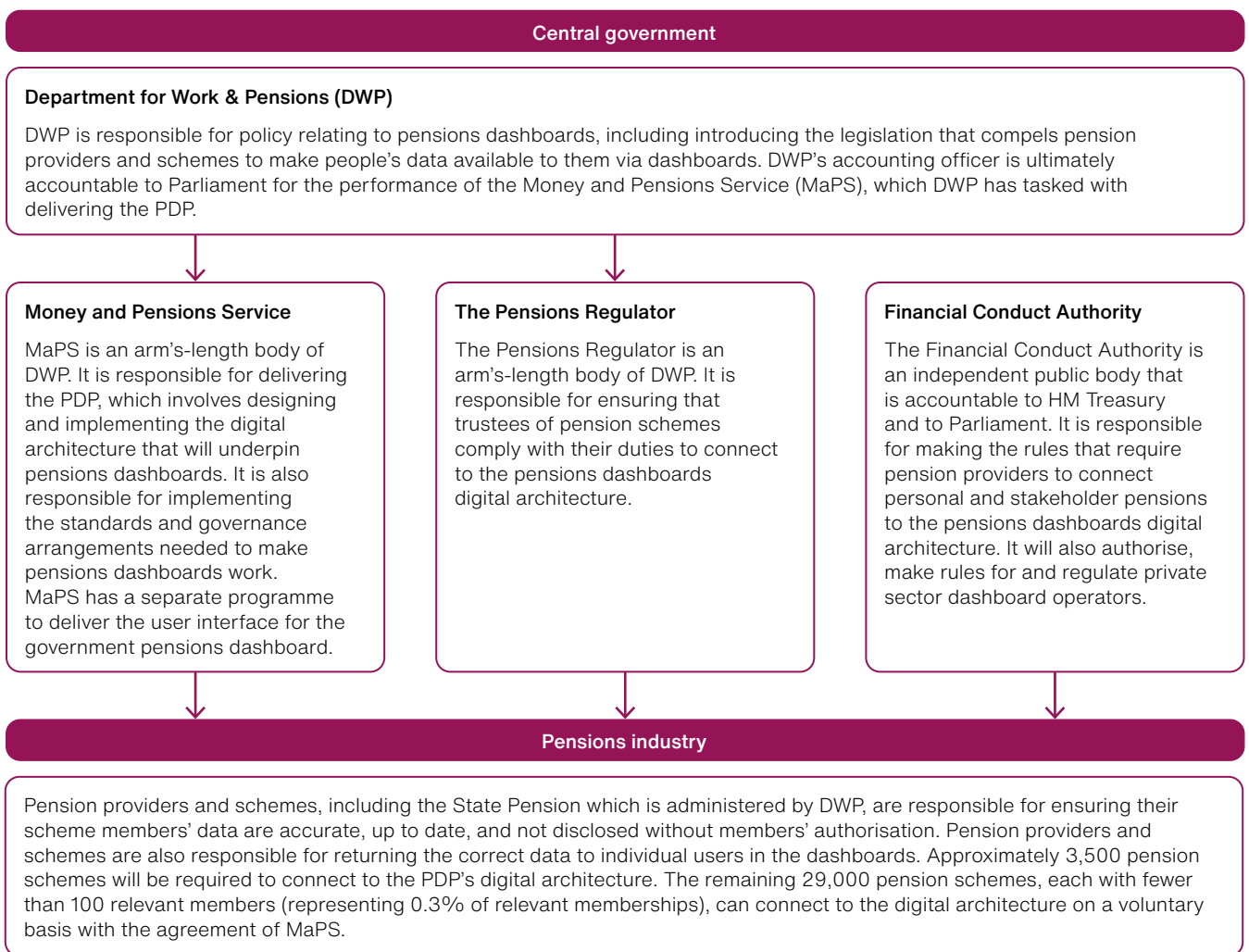
<sup>8</sup> Comptroller and Auditor General, *The challenges in implementing digital change*, Session 2021-22, HC 575, National Audit Office, July 2021.

**1.12** To deliver the PDP successfully, MaPS needs to work with a range of organisations within government and beyond who are responsible for delivering elements of the service. **Figure 1** sets out the main bodies involved in the PDP and their roles.

**Figure 1**

**Bodies involved in the Pensions Dashboards Programme (PDP)**

Multiple bodies, both inside and outside government, are involved in the PDP



**Note**

1 The arrows indicate oversight relationships, with the bodies above overseeing the bodies below.

Source: National Audit Office analysis of information from the Department for Work & Pensions and the Money and Pensions Service

**1.13** The scope of the PDP does not encompass the government dashboard that will allow people to view their pensions information. MaPS has a separate programme responsible for designing and delivering this user interface, which is called the MoneyHelper Pensions Dashboard. At the time of our work, the outline business case for this programme was awaiting approval from DWP and then HM Treasury. The MoneyHelper Pensions Dashboard Programme has a number of dependencies with the PDP, including access to the digital architecture.

**1.14** Other organisations are also expected to offer their own commercial dashboards, underpinned by the PDP's digital architecture. In December 2022, the Financial Conduct Authority published its proposed regulatory framework for pensions dashboard service firms.

## Funding

**1.15** Since 2019-20, the PDP has been funded mainly through two industry levies that also fund MaPS's other operations:

- The Financial Services Levy funds two-thirds of the PDP. This is managed by the Financial Conduct Authority and is levied on regulated financial institutions such as banks and building societies, with amounts due determined by the type of activity undertaken.
- The General Pensions Levy funds the remaining third of the PDP. This is managed by DWP and is levied on occupational pension schemes, with amounts due determined by the number of scheme members.

**1.16** In practice, MaPS initially covers costs incurred using grant-in-aid funding from DWP. DWP then recovers these funds through the two levies. Spending on the PDP is subject to government spending rules and MaPS is required to follow the guidance set out in *Managing Public Money*. Government also made £3.35 million available in 2019-20 to help establish the industry delivery group and to cover the costs incurred in introducing the necessary legislation.

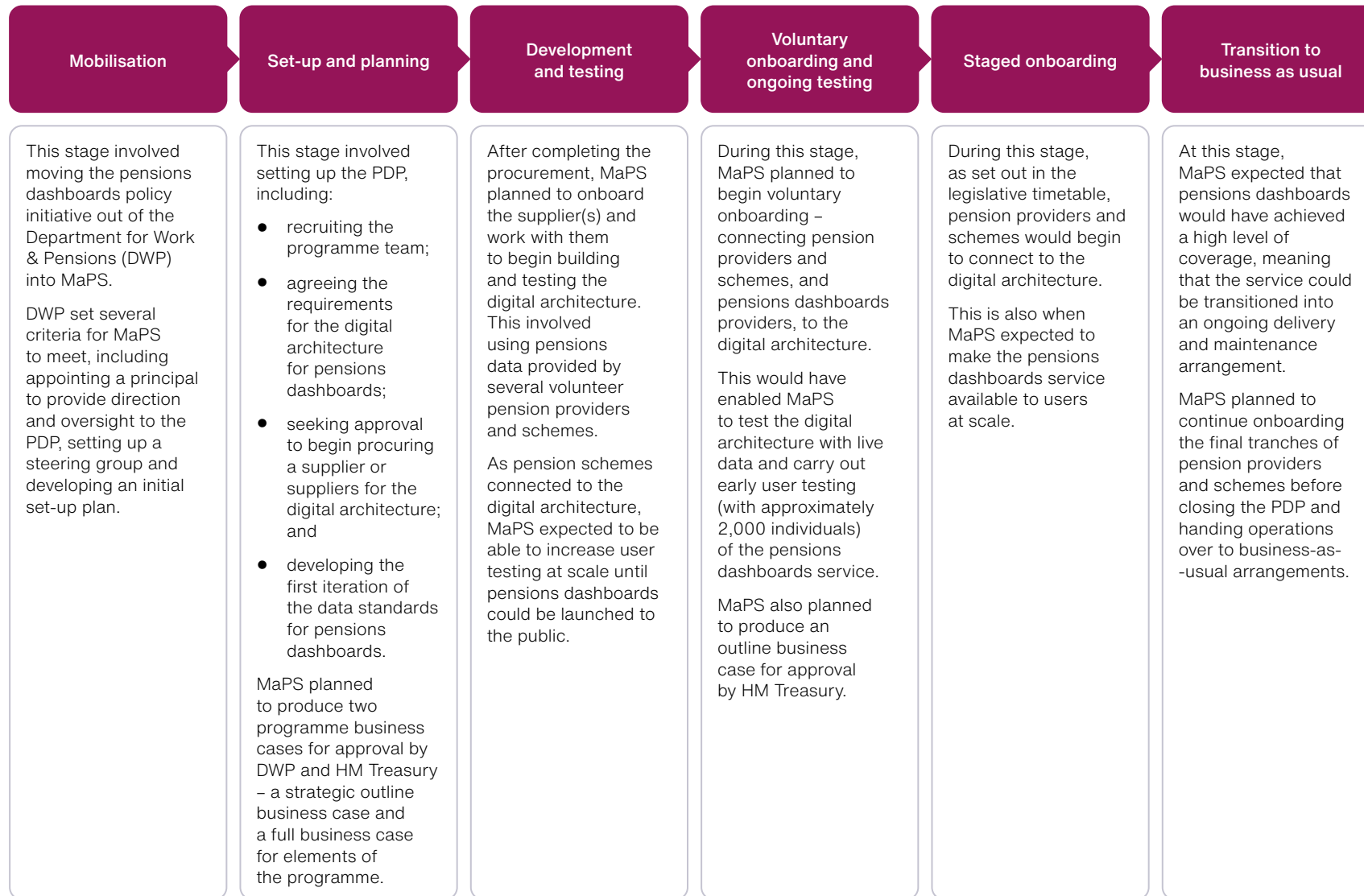
## Delivery timetable

**1.17** MaPS broadly adopted an agile approach to delivering the PDP and designed each stage of the process to include a decision point. This allowed the programme board to sign off the move from one stage of delivery to the next. **Figure 2** overleaf shows the PDP's six delivery stages.

**Figure 2**

Delivery stages of the Pensions Dashboards Programme (PDP)

The Money and Pensions Service (MaPS) planned to deliver the PDP in six stages, each of which had a defined set of activities and outputs



Source: National Audit Office analysis of information from the Department for Work & Pensions and the Money and Pensions Service

**1.18** By autumn 2022, MaPS planned to have completed its testing of the digital architecture and be ready to start onboarding pension providers and schemes. The Pensions Dashboards Regulations 2022 set staging deadlines for when occupational pension schemes were required to connect to the digital architecture, and the Financial Conduct Authority's rules set staging deadlines for personal and stakeholder pension schemes. There were 23 separate staging deadlines depending on pension schemes' size and type. The first deadline was 31 August 2023 and the last deadline was 31 October 2025.

**1.19** DWP or MaPS did not specify when pensions dashboards would be made generally available to the public. Under the Pensions Dashboards Regulations 2022, the Secretary of State is responsible for issuing a notice about when dashboards will become available. Before doing so, the Secretary of State must be satisfied that the dashboards ecosystem is ready to support widespread use of dashboard services by the general public.

**1.20** When the programme was set up in 2019, among the main risks that MaPS identified were that the legislative timetable would be inconsistent with the expected delivery timetable, and that a failure to recruit the necessary resources would lead to an over-reliance on contractors.

## **Costs and benefits**

**1.21** MaPS first formally estimated the cost of the PDP in 2020 in its strategic outline business case. It estimated the total cost would be £235 million, comprising programme costs of £101 million plus running costs of £134 million. This estimate covered 10 years from 2019-20 to 2029-30, including five years of live running. By the time MaPS produced an outline business case for the programme in 2022, estimated programme costs had decreased to £90 million, but live running costs had risen to £179 million, increasing the total cost to £269 million. This estimate covered a longer period – 12 years from 2019-20 to 2031-32, including seven years of live running.

**1.22** DWP also assessed the costs it expects the pensions industry will incur in implementing pensions dashboards. In total, these costs are significantly higher than the costs MaPS expects to incur. In 2022, DWP estimated industry costs at £850 million over 10 years.

**1.23** In the 2020 strategic outline business case, MaPS identified the benefits that the PDP was intended to achieve. These included people recovering lost pension pots and planning their finances better, resulting in improved retirement outcomes. In the 2022 outline business case, MaPS estimated the financial value of the benefits for the first time. In line with the valuation methods set out in HM Treasury's Green Book, MaPS calculated the benefits partly using an estimate of the average price a user would be willing to pay annually to access a pensions dashboard. HM Treasury considers this to be an appropriate technique to estimate the benefits of an intervention in the absence of a direct market price. Users will not have to pay to access pensions dashboards.

**1.24** The price a user was willing to pay was informed by quantitative research carried out by Ipsos MORI in 2021-22. This gave an estimate of 16.3 million potential dashboard users in steady state, who would be willing to pay an estimated average maximum price of £7.31 annually to use a pensions dashboard. In addition, DWP modelling estimated the value of recovered pension pots. These two elements resulted in a gross discounted benefit figure for the PDP of £437 million, based on an assumption that the dashboards service would be available to users from October 2024.<sup>9,10</sup> After taking into account discounted costs of £169 million, MaPS calculated that the PDP had an estimated net present social value of £268 million and therefore concluded that it represented value for money.

### **DWP's oversight arrangements**

**1.25** The main way that DWP monitored MaPS's progress in delivering the PDP was through participating in programme governance arrangements. A senior official from DWP's pensions policy team was a member of the programme board. DWP told us that being part of the programme board allowed it to be directly involved in decision-making, to scrutinise progress in depth, and to challenge and support the programme's leadership team. In addition, senior DWP officials engaged directly with the programme by attending the PDP sub-committee and through membership of the portfolio committee (see paragraph 1.10).

**1.26** DWP also monitored progress on the PDP through its established processes for overseeing MaPS and holding it to account. DWP's accounting officer had regular meetings with MaPS's chair and chief executive at which the PDP and other issues were discussed. The oversight arrangements also included quarterly accountability reviews, which are the routine monitoring meetings that DWP holds with the executive team of each of the arm's-length bodies it sponsors. The meetings were led by DWP's corporate sponsorship team and attended by senior MaPS executives. They covered all aspects of MaPS's performance and provided an opportunity for MaPS to provide assurance on programme delivery as well as to seek guidance on any risks, concerns or barriers to success.

9 £437 million represented 40% of the total estimated benefits. The remaining 60% was attributed to other spending which will contribute to the delivery of pensions dashboards.

10 Discounting allows cost and benefit estimates with different time spans to be compared on a common 'present value' basis.

**1.27** The PDP was also covered at DWP's quarterly digital joint assurance reviews. These were meetings that brought together relevant parts of DWP, including commercial and digital experts, and wider government stakeholders. Through these reviews officials monitored, at a high level, the digital work undertaken across DWP and in some of its arm's-length bodies.

**1.28** Overall, DWP's oversight of the PDP was led by its policy and corporate sponsorship teams, with limited input from digital and programme management experts. DWP told us that the sponsorship teams were the main contact for MaPS and it aimed to draw in wider expertise as necessary. For example, as part of its assurance procedures ahead of business case approvals, it convened panels to review and challenge the PDP. DWP also said, however, that it was mindful of MaPS's autonomy as an arm's-length body and did not want to intervene in a way that would have compromised this.

## Part Two

### Progress in delivering the Pensions Dashboards Programme

**2.1** This part of the report sets out the progress that the Department for Work & Pensions (DWP) and the Money and Pensions Service (MaPS) made in delivering the Pensions Dashboards Programme (PDP) before the decision in March 2023 to reset the programme. Specifically, we cover:

- the main work completed;
- the problems in delivering the PDP, including the reasons for them; and
- the response to the problems.

Part Three of this report covers the period since March 2023. **Figure 3** on pages 24 and 25 shows a timeline of key events relating to the delivery of the PDP from when the programme was set up in 2019 to 2026.

#### **Work completed**

##### Legislation and standards

**2.2** In January 2020, DWP introduced legislation which, among other things, provided the statutory framework for pensions dashboards across the UK. The legislation includes powers for the Secretary of State to create a legal requirement for pension providers and schemes to make people's data available to them via dashboards. It also places a duty on the Financial Conduct Authority to make rules relating to pensions dashboards.

**2.3** After the Pension Schemes Act was passed in February 2021, DWP developed secondary legislation, the Pensions Dashboards Regulations, which required pension providers and schemes to connect to the digital architecture within a specified timeframe (see paragraph 1.18). The regulations also empowered MaPS to set standards for pensions dashboards with the approval of the Secretary of State. MaPS intended that the standards would provide the rules and controls to facilitate the connection of pension providers and schemes, and dashboard providers, to the digital architecture.



**2.4** MaPS began developing the pensions dashboards standards as part of the 'set-up and planning' stage of the PDP (see Figure 2). The standards include:

- **data standards** that will set out the format in which pension providers and schemes will receive a user's information to search for a pension and will return pensions information to a dashboard;
- **design standards** that will set out requirements for presenting pensions information in dashboards and for the design of dashboards, including messaging and signposting;
- **reporting standards** that will set out the data that pension providers and schemes, and dashboard providers, must supply to regulatory bodies, MaPS and DWP, to allow them to monitor the operation of the digital architecture;
- **technical standards** that pension providers and schemes, and dashboard providers, will use to interface with the digital architecture and with each other; and
- **a code of connection** that will combine the required security, service and operational standards, which those providing data and dashboards must adhere to.

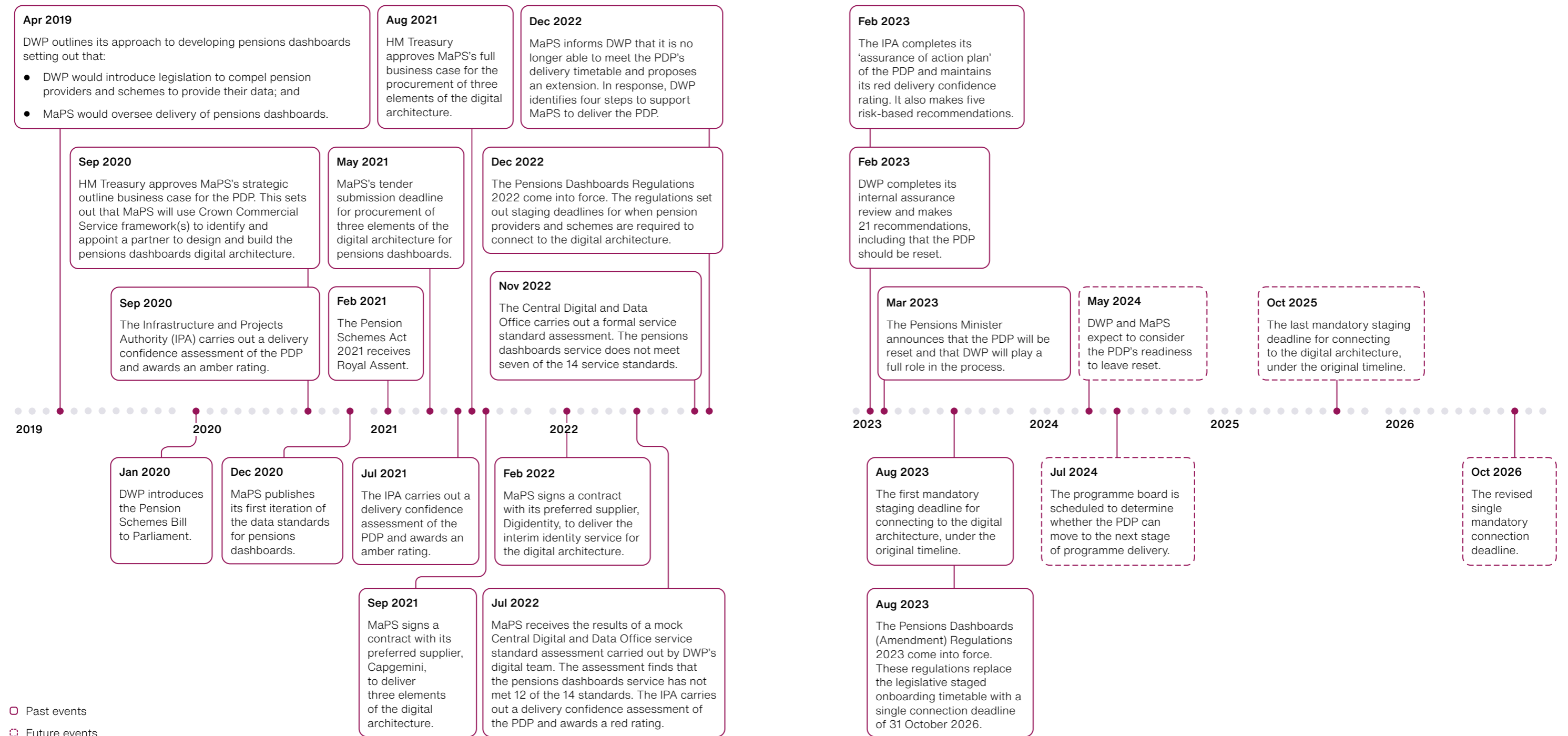
**2.5** In December 2020, after engaging with the pensions industry and consumer organisations, MaPS published draft data standards. It had also made plans for gathering input and developing the design standards during the following year. By the end of 2022, MaPS had published draft versions of all the standards. At the time of our work, it intended to refine these drafts using feedback from the industry, before submitting final versions to the Secretary of State for approval in February 2025.

### Appointment of suppliers

**2.6** In its 2020 strategic outline business case for the PDP, MaPS set out plans to procure a partner to design, build and run the digital architecture for pensions dashboards. MaPS told us that it engaged externally, including with the Crown Commercial Service and DWP's commercial team, to develop the PDP's commercial strategy and determine the best procurement route. In doing so, MaPS also produced a supplement to its strategic outline business case, which allowed it to proceed with the procurement without producing an outline business case.

**Figure 3**  
Timeline of key events relating to the delivery of the Pensions Dashboards Programme (PDP) from 2019 to 2026

The Department for Work & Pensions (DWP) and the Money and Pensions Service (MaPS) made progress in delivering the PDP but in 2023, due to a range of issues, DWP and MaPS agreed to reset the programme to allow more time for delivery



Source: National Audit Office analysis of information from the Department for Work & Pensions and the Money and Pensions Service

**2.7** In January 2021, the Crown Commercial Service confirmed that MaPS would be able to use one of its technology services frameworks to procure the end-to-end delivery of the digital architecture.<sup>11</sup> However, as the chosen framework was set to expire in September 2021, MaPS needed to complete the procurement exercise and sign a contract with its preferred supplier by this date.

**2.8** MaPS recognised that it would have to work at pace to meet the timetable and boost its resources and skills. It set out that, as well as closely monitoring these risks, it would take steps to mitigate them:

- **On the timetable:** MaPS developed plans to undertake early engagement with DWP and across government to agree a procurement timetable; established decision points during the procurement process to allow it to identify early if its approvals timeline was at risk; and developed contingency plans to deploy in the event its procurement approach was no longer feasible.
- **On resources and skills:** MaPS recruited additional digital and commercial staff; developed a flexible resourcing strategy; and put in place regular monitoring of programme activity to support better resourcing forecasts.

**2.9** MaPS decided to proceed with procuring a supplier under the existing Crown Commercial Service framework. The alternative was to wait for the successor framework, which was set to become operational in summer 2021, but MaPS did not want to delay the procurement. In April 2021, it issued an invitation to tender for the contract to the 72 suppliers working under the existing framework. MaPS knew, however, that only a relatively small number of suppliers would be capable of taking on the work proposed. While there were a number of clarification requests from suppliers, MaPS received only one bid, from Capgemini, by the deadline in May 2021.

**2.10** MaPS subsequently confirmed Capgemini as its recommended supplier to deliver three components of the digital architecture – the the consent and authorisation service, the governance register, and the pension finder service. In doing so, MaPS highlighted Capgemini’s comprehensive bid submission, which it determined had met the PDP’s digital architecture requirements and tender evaluation criteria.

**2.11** To allow it to agree the contract, MaPS produced a full business case for the three elements of the programme it had set out to procure, which was approved by HM Treasury in August 2021. In September 2021, MaPS signed a five-year contract with Capgemini, worth £44 million, with the option to extend for a further two years.

<sup>11</sup> The Crown Commercial Service is an executive agency of the Cabinet Office whose purpose is to help the public sector get better value for money from the procurement of common goods and services. It puts in place commercial agreements (frameworks) for a wide variety of goods and services. To get a place on a framework, suppliers go through a full competitive procurement process and must be evaluated as capable of delivering the specified requirements.

**2.12** MaPS undertook a second procurement exercise in October 2021 to appoint an interim supplier to deliver the final component of the digital architecture, the identity service, which will allow dashboard providers to verify users' identities. This procurement took place using the Crown Commercial Service's 'G-Cloud' commercial agreement, after MaPS engaged with the identity service industry to help shape the technical requirement.<sup>12</sup> In February 2022, MaPS signed a two-year contract, worth up to £2 million with zero commitment, with its chosen supplier, Digidentity.

### Development and testing of the digital architecture

**2.13** In autumn 2021, the PDP entered the 'development and testing' stage of the delivery timetable (see Figure 2). MaPS worked with Capgemini, and Capgemini's subcontractor Origo, to build the digital architecture and test its functionality. This involved testing the system with the support of seven pension providers and three commercial dashboard providers, who volunteered to take part. MaPS estimated that in total the volunteer pension providers represented a potential coverage of more than 30 million pensions.

**2.14** MaPS intended that the testing would allow the PDP to identify areas of the digital architecture and service design that needed to be refined. This would then allow the programme to move to the next stage of delivery, the 'voluntary onboarding and ongoing testing' stage, in April 2022. In this phase, MaPS planned to work with live data, including State Pension data provided by DWP, and a bigger group of pension providers and schemes.

## Problems in delivering the PDP

### Assurance review findings

**2.15** The PDP is one of DWP's programmes in the Government Major Projects Portfolio and is subject to regular scrutiny by the Infrastructure and Projects Authority (IPA).<sup>13</sup> MaPS scheduled IPA assurance reviews and other assessments to inform key decision points in the programme (see paragraph 1.17).

<sup>12</sup> The Crown Commercial Service's G-Cloud commercial agreement comprises an online digital marketplace through which public sector customers can buy cloud-based computing services such as hosting, software and support.

<sup>13</sup> The Government Major Projects Portfolio comprises the largest, most innovative and highest-risk projects and programmes delivered by government.

**2.16** The IPA carried out assurance reviews of the PDP in September 2020 and July 2021, both of which awarded the programme an ‘amber’ delivery confidence rating. This rating means that successful delivery appears feasible but significant issues exist, requiring management attention; the issues appear resolvable and, if addressed promptly, should not present a cost or schedule overrun. The IPA made recommendations for improvements in a variety of areas including governance, resourcing and skills, programme management and commercial approach. It highlighted the PDP’s lack of resource and experience in large digital programme delivery, which it found had led to an underestimation of the time required to complete the work planned. In addition, the reliance on the programme director’s delivery experience represented a significant ‘single point of failure’ risk to delivery. MaPS took action after each of these reviews to address the recommendations, including appointing a head of technology development for the programme in March 2021.

**2.17** In July 2022, MaPS was preparing to move to the next stage of delivery – from building and testing the digital architecture to voluntary onboarding of pension providers and schemes to the live service and ongoing testing (see Figure 2). By then, much of the core digital architecture had been built and delivered by the programme’s suppliers. However, before the programme could progress, the pensions dashboards service was subject to a ‘service standard assessment’. A service standard assessment is a process managed by the Central Digital and Data Office and is designed to ensure that government services are built to a good standard.<sup>14</sup> The assessment requires services, in this case the pensions dashboards service, to meet 14 standards by demonstrating, for example, that the service is accessible and simple to use.

**2.18** The pensions dashboards service initially underwent a mock service standard assessment in July 2022, carried out by DWP’s digital team. This assessment found that the service did not meet 12 of the 14 standards.

**2.19** In July 2022, in light of the findings of the mock assessment, the IPA awarded the PDP a ‘red’ delivery confidence rating. The IPA also noted that, before seeing the report of the mock assessment, its review team considered that the programme was on track to receive an ‘amber’ rating. A red rating means that successful delivery appears unachievable; there are major issues with project definition, schedule, budget, quality and/or benefits delivery, which at that stage do not appear to be manageable or resolvable; the project may need re-scoping and/or its overall viability re-assessed. In response, the senior responsible owner developed an action plan to address the IPA’s recommendations, and the IPA worked with the programme to arrange an ‘assurance of action plan’ to review progress against the plan and to reinforce or revise its delivery confidence assessment based on updated findings.

<sup>14</sup> The Central Digital and Data Office is part of the Cabinet Office and leads the government digital and data function.

## Impact on the delivery timetable

**2.20** In October 2022, MaPS told DWP that, due to resource and knowledge gaps, the PDP had not prepared adequately for the mock service standard assessment. It assured DWP, including through an exchange of letters between DWP's accounting officer and the chair of MaPS, that the delay in passing the assessment would not have a significant impact on the PDP's overall delivery timetable. It said it had contingency plans to ensure that it could prioritise pension providers and schemes connecting to the digital architecture by the time the first connection stage began in April 2023.

**2.21** However, MaPS also highlighted two particular risks which it recognised could affect delivery of the PDP if they were not addressed:

- **Lack of skilled resources:** MaPS's small digital function meant it had limited resilience to staff turnover in this area. The PDP also had specialist roles that did not exist elsewhere in MaPS. This, coupled with limits on the reward it could offer for specialist roles, meant it had been unable to fill vacancies in the programme team for a sustained period. To help mitigate this risk, the chair of MaPS asked DWP for its continued support on resourcing. DWP told us it supported MaPS to strengthen its technical expertise.
- **Commercial challenges:** In his letter, the chair of MaPS said that DWP would be kept informed, including through the programme board, about challenges MaPS was managing in relation to its supplier. MaPS's contract with Capgemini had constraints that hampered MaPS's ability to oversee effectively the design and delivery of the digital architecture. The architecture was commissioned through individual statements of work allowing it to be delivered iteratively using an agile approach, but the acceptance criteria for these statements were not robust enough to protect the programme effectively against poor quality or non-delivery. This resulted in Capgemini not delivering some aspects of the architecture to the standard expected, prompting MaPS to retain two payments in 2022. The amounts were subsequently paid upon completion of the agreed deliverables.

**2.22** In December 2022, after a formal service standard assessment by the Central Digital and Data Office found the PDP still did not meet seven of the 14 standards, MaPS told DWP that the delivery timetable was no longer viable. It advised that it would be unable to carry out early live testing of pensions dashboards or connect pension providers and schemes as planned by 31 August 2023, the first staging deadline set in the regulations. There were also a number of longer-term issues that remained outstanding, including issues relating to the security of the digital architecture and resourcing and capability challenges.

**2.23** Given these problems, MaPS proposed that the connection timetable should be extended by at least six months, meaning the regulations would have to be amended. DWP told us that, on the basis of the assurances it had received from MaPS during autumn 2022, it had not been aware until this point of significant concerns that suggested that the PDP would not be delivered as planned.

**2.24** In response, in December 2022, DWP identified four steps to support MaPS with delivering the PDP:

- Appointing a new independent chair for the PDP, with expertise in project delivery who could offer support and challenge to the programme.
- Appointing a senior digital expert from DWP to be more directly involved in programme governance, including by sitting on the programme board.
- Establishing a working-level team of digital resources to support the PDP. Given MaPS's continuing resourcing challenges, DWP's digital team would work with the PDP to review the revised delivery approach, identify resourcing gaps and agree how to address them.
- Commissioning an internal assurance review to assess delivery confidence, review the viability of the programme's detailed delivery plan, and identify any wider issues that might require more targeted support from DWP if the timetable was to be achieved.

### Reasons for the problems

**2.25** In February 2023, DWP's assurance review awarded the PDP a 'red' delivery confidence rating. It highlighted that the PDP had been unprepared for the level of technical complexity involved in the programme. The review found that, as a relatively new organisation, MaPS had focused on establishing itself and, without the necessary digital and change capabilities, it had taken some time before it recognised delivery issues.

**2.26** DWP's assurance review identified a series of factors that had contributed to the 'red' confidence delivery rating:

- **A lack of resources, with the necessary skills and experience, across all levels of the PDP:** The assurance review found that, at the outset, the delivery and technical complexity of the programme, and the capability and capacity required, were under-estimated. There were also recruitment and retention issues.
- **Ineffective and complex programme governance:** The assurance review found that, despite improvements, the governance was not robust enough to enable effective decision-making. There was little evidence that the programme board was providing sufficient scrutiny and challenge.

- **A lack of a robust contract management regime:** The assurance review found that the absence of robust contract and performance management arrangements had hampered MaPS's ability to assure and appropriately challenge the supplier's technical design and delivery plans for the digital architecture. MaPS had not been able to ensure that the supplier adhered to the agreed design for the digital architecture. This had allowed the supplier to introduce a component that represented a significant variation from the original specification.
- **A lack of appropriate technical and test assurance of the digital architecture:** The assurance review found that the digital architecture did not have several components to comply with Cabinet Office, Central Digital and Data Office and broader government data protection and security standards.
- **Delays in addressing several priority recommendations made by the IPA in July 2022:** The assurance review found that MaPS had not responded to recommendations around governance, leadership capacity and resourcing, in part because it had decided to wait for the outcomes of subsequent reviews before acting.

**2.27** During our investigation, the IPA told us that, due to a lack of digital expertise particularly at senior level, MaPS had not been alert to the severity of the issues the IPA had raised in its assurance reviews and had not been in a position to address them.

## **Response to the problems**

**2.28** On the basis of the findings of its assurance review, DWP made 21 recommendations, one of which was that the PDP should be reset. At the same time as DWP completed its assurance review of the PDP, the IPA set out the findings from its assurance of action plan (see paragraph 2.19). It maintained the 'red' delivery confidence rating on the basis that the PDP had no viable plan to achieve the staged onboarding timetable by the first legislative deadline of 31 August 2023.

**2.29** As well as supporting DWP's proposal to reset the programme, the IPA made five risk-based recommendations across several areas including governance. It highlighted that, in line with the findings of its July 2022 assurance review, MaPS's senior leadership team did not have the necessary expertise and experience to effectively take accountability for delivering the programme.

**2.30** In March 2023, the Pensions Minister announced to Parliament that extra time was needed for the PDP to deliver the digital architecture and facilitate the connection of pension providers and schemes. She confirmed that the programme was being reset and that DWP would play a full role in this process.



## Part Three

### Progress in resetting the Pensions Dashboards Programme

**3.1** This part of the report covers the progress that the Department for Work & Pensions (DWP) and the Money and Pensions Service (MaPS) have made in resetting the Pensions Dashboards Programme (PDP), including key changes that have resulted from the process.

#### **Approach to the reset**

**3.2** A reset is a fundamental or substantial change to what a programme will achieve, or how it is delivered, that cannot be managed through routine change control procedures.<sup>15</sup> DWP recommended that, as part of the reset, the PDP should develop a deliverable plan, with strengthened leadership and robust governance. It should also ensure that resources with the right skills and experience, at all levels, were recruited into the team.

**3.3** DWP appointed a senior official from within the department with project delivery expertise to direct the reset, and an interim reset board was set up by the end of March 2023. The board was chaired by DWP's chief digital and information officer and other members included the reset director and the PDP's senior responsible owner, along with digital and commercial specialists from across DWP and MaPS.

**3.4** The reset board designed a reset process consisting of three stages with criteria which the PDP needed to meet in order to progress to the next stage. The process comprised:

- **the assess stage** – when interim reset governance arrangements would be established, and deep-dives would be carried out into each area of the programme to assess the position;
- **the plan stage** – when solutions would be developed to the issues identified in the assess stage, the detailed delivery plan would be developed, capability gaps would be addressed, the relationship with commercial suppliers would be reset, and the post-reset governance structure and programme arrangements would be agreed; and

<sup>15</sup> Comptroller and Auditor General, *Lessons learned: Resetting major programmes*, Session 2022-23, HC 1198, National Audit Office, March 2023.

- **the mobilise stage** – when the plans developed during the previous stage would be mobilised, the PDP’s financial case and outline business case would be refreshed, new governance structures would be implemented, work on recruitment and upskilling would continue, and there would be increased re-engagement with the pensions industry.

## **Reset progress**

**3.5** At the time of our work, the PDP was in the final (mobilise) stage of the reset process. DWP and MaPS have been working to address the recommendations made by DWP and the Infrastructure and Projects Authority (IPA) (see paragraphs 2.28 and 2.29), which were combined into a single set of actions. Overall they have made progress across a range of areas including:

- revising the delivery plan for the PDP with input from programme teams, stakeholders and subject-matter experts, and review by the IPA;
- refreshing the outline business case for the programme, including the estimated costs and benefits;
- completing a technical review of the design of the digital architecture to confirm that it meets the programme’s requirements;
- revising how MaPS works with its supplier, Capgemini, to address commercial challenges; and
- establishing closer working arrangements with the MaPS programme delivering the user interface for pensions dashboards.

**3.6** MaPS has made progress towards meeting the criteria that DWP requires it to satisfy before the PDP can leave reset and proceed. Specifically, in April 2024, MaPS announced that it had appointed a new senior responsible owner with the necessary digital technology experience to lead the rest of the programme. MaPS also needs to confirm that it has the capacity and capability to deliver what remains to be done. During the reset process, a quarter of the programme’s team has been seconded from DWP. MaPS has now reached an agreement with DWP on the level of ongoing support that DWP will provide once the reset has been completed. DWP and MaPS told us they expect to consider in May 2024 the PDP’s readiness to leave reset.

**3.7** Since the pensions dashboards service did not meet seven of the 14 service standards in November 2022 (see paragraph 2.22), MaPS has worked with DWP and the Central Digital and Data Office to re-evaluate which parts of the service need to meet the standards. The Central Digital and Data Office has advised that, although the digital architecture for pensions dashboards needs to be developed in line with the service standards, it will not be tested in isolation. Instead, future service standard assessments will focus on the ‘end-to-end user journey’, which will finish with people viewing their pensions information on the dashboard.

## Changes resulting from the reset

### Revised governance arrangements

**3.8** As part of the reset process, MaPS designed a new governance structure for the PDP that sought to address the issues identified in the assurance reviews that DWP and the IPA had previously carried out. These reviews found that the governance arrangements had been ineffective because they were overly complex and burdensome, increasing the risk of poor-quality decision-making.

**3.9** The PDP will have three senior forums: a programme board to provide strategic direction; a delivery group that will actively manage the delivery plan; and a delivery partners delivery meeting to manage dependencies and risks across organisational boundaries. The previous steering group will be replaced with a senior-level industry advisory group to provide strategic input and industry perspectives. The PDP will also develop an assurance liaison function to manage the relationship with external bodies including HM Treasury and the IPA.

**3.10** The revised governance arrangements seek to enable more effective working with key stakeholders, including the parallel programme team tasked with delivering the user interface for pensions dashboards. They also aim to provide better 'lines of sight' for DWP over the programme, including through membership of the new delivery partners delivery meeting. In addition, DWP will link up the PDP with a range of existing departmental forums that the programme did not previously have access to. This is intended to help the PDP draw on subject-matter experts and good practice.

### Revised timetable

**3.11** In June 2023, the Pensions Minister laid amending regulations (and the Financial Conduct Authority subsequently amended its rules) that replaced the staged timeline with a single mandatory connection deadline of 31 October 2026 (**Figure 4** on pages 36 and 37). DWP consulted MaPS about this deadline. However, it had limited assurance at that point that the new date was achievable as the reset team had not had sufficient time to carry out detailed planning of what remained to be done to deliver the PDP. DWP told us, however, that it had been satisfied that its approach was reasonable and would increase wider confidence because:

- setting only the final connection deadline in legislation, rather than the full staging timeline, would build flexibility into the PDP's delivery timetable and allow MaPS to flex milestones as needed; and
- revising the connection timeline at the start of the reset process would enable early communication of the position to the pensions industry and prevent pension providers and schemes unintentionally breaching the regulations.

**3.12** MaPS initially identified the single connection deadline as a ‘red’ risk to successful delivery of the PDP. Specifically, if a large proportion of pension providers and schemes were to wait until near the deadline to connect, this could cause capacity challenges for the PDP. It would also put at risk its ability to test the service with real users at scale and refine the digital architecture in response.

**3.13** Having taken mitigating action, MaPS now assesses the single connection deadline as an ‘amber’ risk. It has developed a detailed plan, which has increased its confidence that the deadline is achievable. In addition, in March 2024, DWP published a revised staging timeline in guidance, setting out when pension providers and schemes, by size and type, are scheduled to connect to the digital architecture. The timetable prioritises connection of the largest pension providers and schemes to allow user testing to take place quickly at scale, with the first cohort expected to have completed connection by 30 April 2025. While the timetable is not mandatory, pension providers and schemes are legally required to have regard to the guidance. The representatives of the pensions industry we spoke to stressed the importance of the guidance in helping the industry prepare adequately for the connection deadline. They raised concerns about DWP’s and MaPS’s communication on this subject before the dates were shared and about their general transparency during the early stages of the reset process.

**3.14** Due to the later connection deadline, pensions dashboards are now expected to be available to the public later than previously expected. As noted in paragraph 1.19, the Secretary of State is responsible for issuing a notice about when dashboards will become available.

#### Revised costs and benefits

**3.15** The estimated cost of the PDP has increased by £54 million (23%) in cash terms, from £235 million in 2020 to £289 million in 2023 (**Figure 5** on page 38). In its 2023 financial refresh, MaPS estimated that programme costs will now be £139 million and live running costs will be £150 million over the life of the programme from 2019-20 to 2031-32.

**3.16** A range of factors have led to the rise in the estimated cost. These include an increase in supplier costs, changes to MaPS’s underlying costing assumptions, and the period covered being extended by two years to 2031-32. MaPS now expects delivery of the digital architecture, including testing and onboarding of pension providers and schemes, to be completed in 2026-27, after which it will transition the programme to business as usual.

**3.17** DWP has also revised its estimate of the cost of pensions dashboards to the pensions industry. It now estimates that from 2022-23 to 2031-32 pension schemes and providers will incur costs of £688 million, a £162 million decrease from its 2022 estimate of £850 million.

**Figure 4**  
Original and revised timetable for delivering the Pensions Dashboards Programme (PDP)

The delivery timetable for the PDP was revised as part of the reset process and pension providers and schemes are now required to connect to the digital architecture by 31 October 2026



● 2022 outline business case

● 2023 financial refresh

**Notes**

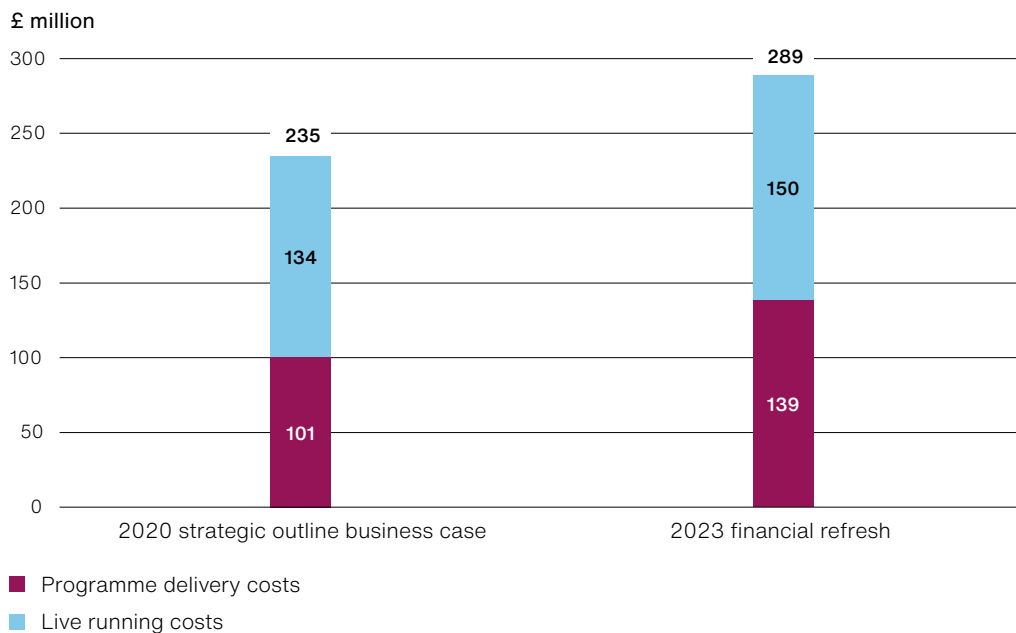
- 1 The Pensions Dashboards Regulations 2022 set out a mandatory staged onboarding timetable for pension providers and schemes to connect to the digital architecture. There were 23 separate staging deadlines depending on pension schemes' size and type. The first deadline was 31 August 2023 and the last deadline was 31 October 2025.
- 2 The Pensions Dashboards (Amendment) Regulations 2023 replaced the staged onboarding timetable with a single connection deadline of 31 October 2026.
- 3 The Department for Work & Pensions has not yet specified when pensions dashboards will become available to the public but, due to the later connection deadline, this is expected to be later than previously expected.
- 4 The 2022 outline business case did not reach HM Treasury approval stage before the programme went into reset.

Source: National Audit Office analysis of information from the Department for Work & Pensions and the Money and Pensions Service

**Figure 5**

Estimated cost of the Pensions Dashboards Programme (PDP) in 2020 and 2023

The estimated cost of the PDP has risen from £235 million in 2020 to £289 million in 2023, an increase of 23%



**Notes**

- 1 The 2020 strategic outline business case estimated costs for the whole life of the programme and a period of live running, from 2019-20 to 2029-30.
- 2 The 2023 financial refresh estimated costs for the whole life of the programme and a period of live running, from 2019-20 to 2031-32.

Source: National Audit Office analysis of information from the Department for Work & Pensions and the Money and Pensions Service

**3.18** From April 2019 to March 2024, MaPS spent £59 million on the PDP.

It categorised expenditure on the PDP in 2022-23 as capital spending, meaning it was used to develop new infrastructure rather than for running costs. For 2023-24, MaPS does not intend to categorise the majority of expenditure on the PDP as capital spending. This indicates that most spending in the last financial year did not result in further development of the digital architecture. It was instead used to maintain the platform and services during the reset process.

**3.19** In its 2023 financial refresh, MaPS estimated that the PDP would generate gross discounted benefits of £413 million from 2022-23 to 2031-32, based on an assumption that pensions dashboards would become available to users in November 2026. This represented a reduction of £24 million (5%) compared with the estimate of £437 million in 2022. The estimated net present social value of the programme has also decreased, although MaPS remains confident that the programme represents value for money. In 2023, it estimated that the programme would achieve a net present social value of £211 million. This was £57 million (21%) less than the 2022 estimate of £268 million.

**3.20** Before the reset, DWP and MaPS worked with The Pensions Regulator and the Financial Conduct Authority to develop five 'critical success factors' to help assess progress in delivering the PDP. DWP intends that these factors will underpin its monitoring and evaluation framework for the programme, which will include process and impact evaluations. Through the impact evaluation in due course, DWP plans to examine whether the long-term policy objectives have been met, including whether users have been reconnected with lost pension pots and have increased their awareness and understanding of their pension information and estimated retirement income.

## Lessons learned

**3.21** DWP and MaPS have begun to make changes in response to lessons from the PDP. In its assurance review of the PDP, DWP set out several overarching lessons, particularly in respect of its relationship with arm's-length bodies. DWP told us that, in making changes, it is mindful of not overriding arm's-length bodies' autonomy. The lessons, and the actions being taken, include the following:

- DWP identified that it needs to clarify its relationship and accountabilities with arm's-length bodies on programme delivery. It also needs to set clear expectations of performance in a way that does not compromise arm's-length bodies' autonomy or DWP's oversight. In response, DWP is strengthening arm's-length bodies' links to its governance arrangements. For example, it has decided that in future arm's-length bodies delivering Government Major Projects Portfolio programmes (where DWP is the policy sponsor) will be required to attend regularly the departmental change portfolio board, as well as the departmental investment committee at key stages or when requested by DWP. MaPS has also revised its approach to scrutinising business.

- DWP identified that it needs to ensure that its functions, such as digital, recognise the importance of, and prioritise adequate support for, arm's-length bodies. The assurance review also noted that DWP needs to consider how bodies could be appropriately supported while still allowing them to deliver at arm's length. In response, DWP has improved the support and assurance offer from its functional areas to arm's-length bodies. It is still in the process of refining its approach, noting that its input should be proportionate to the level of risk. In respect of MaPS specifically, DWP has strengthened its quarterly accountability reviews by involving a risk expert and representatives from its functional teams as needed.
- DWP identified that, in choosing an arm's-length body as its delivery mechanism, it needs to give consideration to the maturity and stability of the body. In the case of the PDP, MaPS had been recently formed from three pre-existing organisations when it took responsibility for PDP delivery. In future, where a Government Major Projects Portfolio programme is delivered by an arm's-length body, DWP plans to ensure that the body's board is assuring itself about technical capability, including in relation to digital and change management.
- DWP identified that MaPS needs to encourage sufficient scrutiny and challenge, and use escalation routes to DWP via the MaPS board. MaPS acknowledges that, in the lead-up to the PDP reset, it had not appreciated the full extent of the issues the programme was facing and had been overly optimistic about its ability to manage them. As part of the reset process, MaPS has revised programme governance (see paragraphs 3.8 to 3.10). DWP has also started to modify its framework document with MaPS, with the intention that the document will include a clearer statement about MaPS's responsibility to deliver the PDP.



# Appendix One

## Our investigative approach

### Scope

**1** This investigation covers the Pensions Dashboards Programme (PDP). The purpose of the PDP is to design and implement the digital architecture needed to make pensions dashboards work across the UK. The PDP is one of the Department for Work & Pensions' (DWP's) major projects and is part of the Government Major Projects Portfolio. DWP has delegated responsibility for delivering the PDP to one of its arm's-length bodies, the Money and Pensions Service (MaPS).

**2** We undertook this investigation after receiving Parliamentary correspondence asking us to consider investigating the delays in delivering the PDP. After reviewing documents and discussing the programme with DWP officials, we decided there would be value in undertaking an investigation into the delivery of the PDP, focusing on events since 2019 when DWP decided to delegate delivery to MaPS.

**3** The investigation covers three areas:

- the purpose of pensions dashboards and how the PDP was set up;
- the progress DWP and MaPS have made in delivering the PDP, and the problems with implementation; and
- the progress DWP and MaPS have made in resetting the PDP, and the main changes that have resulted from the process.

**4** The purpose of the investigation was to establish the facts about the PDP. Our work was not designed to assess the value for money of the PDP.

**5** A separate programme, which sits within MaPS alongside the PDP, is responsible for delivering the user interface for the government dashboard through which users will be able to access their pensions information. Our investigation did not cover this programme.

**6** In this report, we refer to trustees and managers of relevant occupational pension schemes, including trust-based schemes with 100 or more relevant members (active, deferred or pension credit members) and public service pension schemes, as ‘pension schemes’. These are regulated by The Pensions Regulator. We refer to providers of individual and group stakeholder and personal pensions, such as life insurance companies, as ‘pension providers’. These are regulated by the Financial Conduct Authority.

## **Methods**

**7** In establishing the facts about the PDP, we drew on a variety of evidence sources as described in the paragraphs below. We collected evidence from December 2023 to April 2024. We collated and analysed the evidence we obtained, and looked across different sources of evidence to support each of our findings.

### Interviews with DWP and MaPS

**8** We conducted interviews with staff from DWP and MaPS involved in the PDP:

- From DWP, we interviewed officials from the Pensions Policy Group and the Corporate Sponsorship team, responsible for overseeing and supporting MaPS and monitoring progress on the PDP.
- From MaPS, we interviewed staff involved in delivering and resetting the PDP.

**9** We conducted all interviews online using agendas and topic guides linked to our study questions. We tailored each interview to the responsibilities of the people we were talking to.

**10** We used these interviews to develop our overall understanding of the PDP, including the progress DWP and MaPS made in delivering the programme before the reset, the factors which led to the programme being reset, and the progress that has been made in resetting the programme. Where possible, we triangulated interview evidence with documentary and other evidence.

### Interviews with other bodies

**11** We interviewed officials from the Infrastructure and Projects Authority (IPA) responsible for oversight and scrutiny of DWP’s programmes in the Government Major Projects Portfolio, including the PDP. We used this interview to understand what scrutiny has taken place and to discuss the findings from the assurance reviews to date.

**12** We conducted three online interviews with representatives of the pensions industry, including from the Association of British Insurers and the Pensions and Lifetime Savings Association. Our objective was to understand the industry's experience and expectations of the PDP, and their assessment of how the programme reset has affected the readiness of pension providers and schemes to connect to the digital architecture.

### Document review

**13** We reviewed a range of published and unpublished documents. This review formed the foundation of our evidence base and allowed us to develop our understanding of how the programme evolved, from being set up in 2019 to the reset process which was ongoing at the time of our work. The documents we reviewed included:

- published MaPS and PDP documents, such as the PDP's six-monthly progress reports (dating from April 2020 to October 2023), research reports, blogs and press releases;
- unpublished DWP and MaPS documents, such as the PDP's programme board papers and minutes, meeting minutes, impact assessments, delivery plans, management information, risk registers and correspondence;
- PDP business cases including the 2020 strategic outline business case, the 2021 full business case for elements of the pensions dashboards digital architecture, the 2022 outline business case and the 2023 financial refresh. We used the business cases as our source for MaPS's estimate of programme costs and benefits;
- reports of assurance reviews carried out by DWP, the IPA and the Central Digital and Data Office;
- the Pension Schemes Act 2021, the Pensions Dashboards Regulations 2022, ministerial announcements and the framework document between DWP and MaPS; and
- material published by the Work and Pensions Committee and the House of Commons Library.

### Internal consultation

**14** We consulted with representatives from several of the National Audit Office's insight teams, which are centres of expertise on specialist subjects, to seek their input on commercial, digital and major project delivery issues. We also drew on our 2021 report on the challenges in implementing digital change.<sup>16</sup>

<sup>16</sup> Comptroller and Auditor General, *The challenges in implementing digital change*, Session 2021-22, HC 575, National Audit Office, July 2021.



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