THE SOCIETY OF PENSION PROFESSIONALS

making pensions work

Pensions in a Digital World:

Embedding Inclusion

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Foreword

Digital transformation is reshaping the pensions landscape at pace, fundamentally changing how schemes communicate with members, how decisions are supported, and how retirement outcomes are shaped. From online member portals and mobile applications to emerging technologies such as pensions dashboards and artificial intelligence (AI), the direction of travel is clear: pensions are becoming increasingly digital by design.

This evolution brings significant opportunities. Done well, digital tools can improve accessibility, enhance engagement, reduce administrative friction, and support better-informed decision-making at key life stages.

However, these benefits are not distributed evenly. A growing reliance on digital channels also risks widening existing inequalities for those who lack access, skills, confidence, or trust in digital services.

Pensions are uniquely sensitive to these risks. They are long-term, high-stakes financial arrangements where disengagement or misunderstanding can have lifelong consequences. As the industry continues to innovate, it is therefore essential that digital development is accompanied by an equally strong commitment to inclusion.

This SPP paper examines the evolving digital pensions environment, explores the nature, and causes of digital exclusion, and considers the implications for members, trustees, providers, policymakers, and regulators. It also highlights practical steps that can help to ensure that digital progress strengthens, rather than undermines, fairness and access across the pensions system.

Mamunul Wahid, Chair, SPP Digital Inclusion Working Group

Introduction

Digital technology now underpins how pension schemes operate and how members engage with their benefits. Online portals and apps, pensions dashboards, digital communications and technologies such as Artificial Intelligence (AI) have the potential to improve efficiency and member outcomes. However, these benefits are not experienced equally by all, highlighting the need for a greater focus on digital inclusion.

What do we mean by digital inclusion?

Digital inclusion has been defined in the Government's Digital Inclusion Action Plan as 'ensuring that everyone has the access, skills, support, and confidence to participate in and benefit from our modern digital society, whatever their circumstances.'[1] The Government has identified four areas to focus on:

> Opening up opportunities through skills
> Tackling data and device poverty
> Breaking down barriers to digital services
> Building confidence and supporting local delivery

In a pensions context, this goes beyond access to technology alone. It includes whether members can understand and navigate digital pensions platforms, trust the systems they are using, and feel confident making decisions based on the information provided, with appropriate support where needed.

A member may have access to online services but still be digitally excluded if they lack confidence or trust. Usability is another key consideration, particularly for those who experience accessibility barriers. These factors must be considered to ensure a truly inclusive digital offering.

Why does digital inclusion matter in pensions?

Pension saving is long term, often compulsory, delivered at scale, and typically characterised by low engagement. Decisions made have lifelong financial consequences rather than short-term impacts. This makes digital inclusion particularly important.

Members are increasingly expected to engage with their pensions through digital services, particularly at key decision points such as retirement. Where individuals are unable or unwilling to engage digitally, they may miss important information or make poorer decisions. Scheme design could be a mitigating factor. For example, in Collective Defined Contribution (CDC) schemes member freedom and choice plays less of a role, and schemes simply provide an income in retirement to replace their work income.

There is also a link between digital exclusion and increased vulnerability to pension scams and fraud, particularly where individuals lack the confidence or knowledge to assess online communications or offers. Where users lack digital skills they may receive support from a relative, friend or carer and use proxy access to manage their accounts, with informal workarounds such as sharing passwords or staying logged in on shared devices. This is unsafe and can lead to an increased risk of fraud or mistakes. All of this highlights the importance of initiatives such as the Pensions Scams Industry Group (PSIG), which provides guidance to help schemes identify and prevent scams.

Beyond the risk of scams and fraud, the pensions industry is also operating in an environment where financial misinformation is increasingly prevalent online. Social media platforms can provide useful channels for engagement, but they also expose individuals to unregulated commentary, misleading claims and misinformation presented as financial guidance. This can undermine confidence, particularly among those with lower levels of financial or digital literacy, who may be unsure which sources can be trusted. Addressing this challenge requires a collective effort from providers, trustees, regulators, policymakers, and industry bodies to promote trusted sources of information, improve digital confidence and ensure members can easily access clear, consistent, and evidence-based communications.

Simply increasing access to digital services is not enough. It must be supported by clear communication and varied communication channels, appropriate context, and education to enable informed decision-making. Digital tools also need to be designed with a range of users in mind, rather than assuming a one-size-fits-all approach.

1 **Department for Science, Innovation & Technology, Digital Inclusion Action Plan: First Steps, February 2025:** https://www.gov.uk/government/publications/digital-inclusion-action-plan-first-steps/digital-inclusion-action-plan-first-steps

The pensions industry is increasing its use of digital tools, including the rollout of Pensions Dashboards and the use of AI.[2] As a result, there is a growing need to ensure inclusivity is considered alongside innovation. It would probably make sense for such work to be undertaken in collaboration with target audiences and representative groups, such as the Business Disability Forum or dedicated accessibility working groups, to ensure solutions reflect lived experience.

The Digital Pensions Landscape

Digital Transformation

The UK pensions industry has undergone a significant digital transformation over the past decade, accelerating sharply in the wake of the COVID-19 pandemic. Member portals which were once static repositories for annual benefit statements have evolved into dynamic self-service platforms offering real time fund valuations, contribution management, and retirement modelling tools.

Alongside portals, mobile applications have become an increasingly critical touchpoint, particularly for younger auto-enrolled members who may interact with their pension more readily through a smartphone than a desktop. Functionality such as push notifications, biometric login, and in app messaging has raised expectations around accessibility and responsiveness.

The use of QR codes has emerged as a practical bridge between physical and digital communications, appearing on paper statements to direct members toward online tools and educational content. Similarly, the shift toward paperless interactions has gathered pace, driven both by regulatory encouragement and member appetite. Many schemes now default to digital communications, with opt-out rather than opt-in arrangements for digital. However, meaningful inclusion demands that these transitions are managed carefully, ensuring that members without reliable internet access, digital literacy, or confidence are not inadvertently marginalised.

A landmark development on the horizon is the Pensions Dashboard Programme. When live, it will allow individuals to view all their pension entitlements in one place, giving millions of savers their first complete picture of retirement savings, with considerable potential to drive engagement. For trustees and administrators, readiness for dashboard connectivity represents one of the most significant digital compliance obligations of this era.

Persistent challenges

Despite this progress, friction and drop-off remain persistent challenges. Research consistently identifies several critical failure points: the onboarding journey, where members abandon registration due to lengthy identity verification processes[3]; documents and statements, which members find difficult to interpret without contextual support[4]; and retirement modelling tools, which often present complex projections without sufficient guidance[5].

AI in Pensions

AI is beginning to reshape how providers address these challenges. AI-powered chatbots and virtual assistants are now deployed by a growing number of companies to handle routine enquiries, reducing call centre demand while extending service availability. More sophisticated applications include personalised engagement nudges, using behavioural data to prompt members at moments of likely decision making and natural language processing tools that simplify the translation of complex pension information into plain English. Predictive analytics is also being applied to identify members at risk of disengagement or poor retirement outcomes, enabling targeted outreach.

While these applications hold genuine promise, the industry must navigate considerations around data governance, algorithmic fairness, and the risk of excluding those least likely to engage with AI-driven interfaces. Responsible deployment of AI in pensions is not simply a technical challenge; it is a digital inclusion imperative.

> *Functionality such as push notifications, biometric login, and in app messaging has raised expectations around accessibility and responsiveness.*

2 **Pensions Age, AI usage 'universal' across pensions, SPP, April 2026:** https://www.pensionsage.com/pa/AI-usage-universal-across-pensions-SPP.php

3 **Signicat, The Battle to Onboard: The Growing Power of Consumer Demand, 2022:** https://www.signicat.com/the-battle-to-onboard-2022

4 **DWP, Understanding Member Engagement with Workplace Pensions, January 2023:** https://https://www.gov.uk/government/publications/understanding-member-engagement-with-workplace-pensions

5 **International Social Security Association, Supporting Retirement Planning: From Digital Tools to Behaviourally Personalized Approaches, April 2026:** https://www.issa.int/analysis/supporting-retirement-planning-digital-tools-behaviourally-personalized-approaches

Who is at risk of exclusion and why?

A primary cause of digital exclusion will be the lack of easy access to a suitable device and internet connection and data allowance to enable online activity.[6]

This could be due to economic circumstances or geographical location, but whatever the reason this will clearly prevent impacted members and prospective members from engaging fully with their pensions, and in particular prevent them from utilising any tools that their pension scheme or provider makes available to enable modelling what their pensions outcomes may look like.

Who?

More vulnerable members and prospective members are most likely to struggle with moving from in-person, telephone and paper-based interactions with their pension providers to a situation where most of such interactions are carried out online. For example, where an individual has not had much experience of using digital devices or accessing websites, just a simple web search could seem like an insurmountable obstacle. The danger here is that it appears easier to disengage.

To illustrate this further we can look to research carried out by Lloyds Bank in 2025 through face-to-face interviews with 300 "digitally disengaged" individuals.

This found that 37% had a health condition which affected digital accessibility, 48% reported a physical or mental impairment which affected the ability to carry out day-to-day activities, 32% were offline because they lived in areas where connectivity is often poor and 25% are offline because they were affected by the cost of getting online.[7]

It is also possible that major life events such as ill-health, bereavement or even retirement itself can exacerbate the risk of digital exclusion, at a time where potentially a member might need the most support from their pension scheme or provider. This could extend to circumstances where the life event happens not to the member themselves but to a partner or family member who has hitherto been the more digitally active or confident and therefore the more likely to "look after" the family finances, including pensions and other savings for later life.

It is perhaps a common misconception that only the elderly are digitally excluded. However, the Lloyds' research also showed that while older people are disproportionately affected (53% of the group of 300 were aged 65 and over), digital exclusion does in fact span all age groups, with almost 1 in 4 being under age 55.[8]

Levels of digital exclusion may also be driven by existing inequalities. Research by Age UK found a link between digital exclusion in later life and levels of deprivation. They found that whilst four fifths (80%) of older people living in the 20% least deprived areas of England used the internet every day, only half (52%) of older people living in the 20% most deprived areas did.[9]

Statistics also suggest that levels of digital exclusion among people aged 65 and over may vary by ethnicity. 82% of older people who are White British used the internet once a month and 87% of White other but only 75% of older Asian people and 68% of older Black people did so.[10]

If this variance in internet use were to be reflected in engagement with pensions services, which increasingly require the use of digital platforms, there is a risk that existing inequalities in pension engagement could be exacerbated.[11]

However, it should be noted that it is often difficult to get a clear insight into many of the factors underlying digital exclusion as by the very nature of the issue, digitally excluded people are hard to reach and less likely to engage with large-scale research which is often conducted via digital means (e.g. online surveys).

Why?

The most common causes of digital exclusion are probably 1) a lack of access to devices or the internet 2) limited digital skills and 3) affordability.

There are of course solutions to these challenges. For instance, there are various charities and community programmes who provide free or low-cost access to laptops and smartphones, community centres and libraries routinely offer free Wi-Fi. In respect of digital skills, colleges, libraries, and community centres often run free training courses. Broadband providers now typically offer low-cost social broadband tariffs for eligible households.

6 **1.6 million people in the UK were estimated to be offline in 2024. Lloyds Banking Group, 2024 Consumer Digital Index, 2024:** https://www.lloydsbankinggroup.com/assets/pdfs/media/consumer-digital-index/2024-consumer-digital-index-report.pdf

7 **Lloyds Banking Group, 2025 UK Consumer Digital Index, 2025:** https://www.lloydsbankinggroup.com/assets/pdfs/media/consumer-digital-index/2025/2025-consumer-digital-index.pdf

8 **Lloyds Banking Group, 2025 UK Consumer Digital Index, 2025:** https://www.lloydsbankinggroup.com/assets/pdfs/media/consumer-digital-index/2025/2025-consumer-digital-index.pdf

9 **Age UK, One in three (31%) over 60s say life is harder than five years ago because more services are now online, March 2025:** https://www.ageuk.org.uk/latest-press/articles/one-in-three-31-over-60s-say-life-is-harder-than-five-years-ago-because-more-services-are-now-online/

10 **Age UK, Facts and figures about digital inclusion and older people, July 2025:** https://www.ageuk.org.uk/siteassets/documents/reports-and-publications/reports-and-briefings/active-communities/internet-use-statistics-july-2025-1.pdf

11 **Financial Conduct Authority, Financial Lives Survey 2024, May 2025:** https://www.fca.org.uk/publication/financial-lives/fls-2024-pensions.pdf

Although much more could be done to address each of these issues, they are not areas where the pensions industry is typically likely to be directly involved.

However, there are several areas where the industry could legitimately play a role in reducing barriers, five of which are detailed below:

1. Multi-Factor Authentication (MFA)

While Multi-Factor Authentication (MFA) is incredibly effective for security, it can create significant, unintended barriers to digital inclusion for various vulnerable or marginalised groups:

> *Financial and Hardware Barriers:* MFA often relies on ownership of a smartphone to run authenticator apps or receive biometric prompts. Individuals who cannot afford a smartphone, or those relying on older devices that do not support modern apps, are effectively locked out.

> *Connectivity and Infrastructure Issues:* Receiving SMS verification codes or app notifications requires stable cellular networks or internet access. People living in rural areas with poor reception, or those using pay-as-you-go data plans who may run out of credit, face frequent access disruptions.

> *Digital Literacy and Cognitive Friction:* Navigating the process of switching between a login screen and an SMS app to retrieve a code, or understanding how to back up authentication keys, requires a certain level of digital literacy. For elderly users or individuals with cognitive impairments, this added complexity can lead to frustration and digital exclusion.

> *Physical and Accessibility Limitations:* For users with visual impairments or motor-skill difficulties, typing in time-sensitive, six-digit codes before they expire can be physically challenging or impossible without assistive technology that may not always integrate well with the MFA process.

> *Reliance on a Single Point of Failure:* If a user loses, breaks, or changes their phone number, the recovery process for MFA-protected accounts often requires complex verification steps or calling customer support lines. For someone with limited resources, this can result in being permanently locked out of essential services like online banking or government portals.

2. Digital-first or online-only services

Some providers encourage or require customers to manage pensions online, making it difficult for people who lack internet access or digital skills.

3. Complex language and inaccessible communications

Pension information can sometimes contain technical jargon and lengthy documents – often due to regulatory requirements - and websites that are difficult to understand or navigate.

4. Poor accessibility for disabled people

Some pension websites, apps, and documents are not fully accessible for people with a visual, hearing, speech, motor, learning or cognitive impairment or those who use assistive technology.

5. Over-reliance on online identity verification systems

Many providers use automated identity checks that require passports, driving licences, credit histories, or smartphone scanning. People without these documents or a strong digital footprint can be locked out.

The pensions industry should certainly consider ways to develop alternative solutions that would prevent these barriers exacerbating any inequalities already impacting those who are digitally excluded. Some of these options are explored below in the section headed *"Digital Inclusion Solutions."*

Economic and operational trade-offs

Balancing efficiency, compliance, and inclusion

The scale of modern pension provision means that schemes must deliver services efficiently to remain affordable. Digital technology offers pension schemes opportunities to improve efficiency, reduce administrative costs and provide members with quicker access to information and services. Digital communications are typically cheaper than paper-based alternatives, while self-service portals can reduce demand on contact centres and administrative teams.

The challenge is that efficiency and member outcomes do not always point in the same direction. A process designed to minimise costs may introduce barriers for some members, while a highly personalised service model may be difficult to deliver at scale. Regulators increasingly emphasise that firms should focus on customer outcomes rather than simply demonstrating technical compliance. In practice, this requires schemes to consider not only whether information has been provided, but whether members are able to access, understand and act upon it.[12] A proportionate approach is therefore needed.

Data and user insight can have an important role to play. Regulators increasingly expect firms to understand the experiences and outcomes of vulnerable customers and, to identify where particular groups face barriers. Better analysis of member behaviour can help schemes target resources effectively, directing support towards those most at risk of exclusion while maintaining scalable digital services for the wider membership.[13]

Is digital-only ever justified?

There are circumstances where a digital only approach may appear appropriate, such as for routine administrative interactions, including updating contact details, viewing account information, or accessing educational content. For these processes, digital channels are often more convenient, faster, and less costly than traditional alternatives.

However, there are strong reasons to be cautious about extending digital-only approaches to all aspects of pension provision. Government policy recognises that people should continue to be able to access offline support where needed, particularly where barriers relating to skills, confidence, affordability, or disability exist.[14]

Digital channels can remain the primary route to engagement for members who are willing and able to use them, while additional support is made available for those who face barriers. This allows schemes to capture the efficiency benefits of digitalisation without excluding groups who require alternative forms of assistance.

The costs and benefits of a digital first approach

Inclusive design requires investment. Accessibility testing, user research, alternative communication formats, translation services, staff training, and the maintenance of multiple service channels can all increase operational costs. Meeting recognised accessibility standards such as WCAG 2.2 may also require additional development and ongoing maintenance.[15]

It is important to distinguish between cost and value. As well as better outcomes for scheme members at risk of experiencing digital exclusion, there is evidence that accessibility improvements often benefit all users not just those with a visual, hearing, speech, motor, learning or cognitive impairment.[16] Simpler navigation, clearer language, better authentication journeys and more intuitive interfaces can reduce errors, improve completion rates and lower support costs.

Well-designed digital services can simultaneously reduce operational costs and improve member experience, while poor design can increase complaints, service requests, and member disengagement, ultimately creating additional costs and operational complexity.

Viewed in this way, inclusive design should not be regarded solely as a compliance expense but as an investment in service quality, trust, and operational resilience.

12 **Financial Conduct Authority, Delivering good outcomes for customers in vulnerable circumstances – good practice and areas for improvement, 2025:** https://www.fca.org.uk/publications/good-and-poor-practice/delivering-vulnerable-customers

13 **Financial Conduct Authority, Delivering good outcomes for customers in vulnerable circumstances – good practice and areas for improvement, 2025:** https://www.fca.org.uk/publications/good-and-poor-practice/delivering-vulnerable-customers

14 **Department for Science, Innovation & Technology, Digital Inclusion Action Plan: First Steps, February 2025:** https://www.gov.uk/government/publications/digital-inclusion-action-plan-first-steps/digital-inclusion-action-plan-first-steps

15 **World Wide Web Consortium, WCAG 2 Overview, 2023:** https://https://www.w3.org/WAI/standards-guidelines/wcag/

16 **Government Digital Service, Building accessible services:** https://gds-way.digital.cabinet-office.gov.uk/manuals/accessibility.html

Digital Inclusion Solutions

This section examines ways that the pensions providers can address the barriers outlined elsewhere in this paper and embed a focus on digital inclusion across the pensions system.

Regulators also have a critical role to play in shaping expectations and driving consistency across the industry. This goes beyond setting technical standards and involves ensuring that digital services are designed and delivered in a way that supports good outcomes for all members.

Principles of inclusive design

Pension schemes often have a large and diverse membership, and the challenge is to design services that work for individuals with different levels of digital confidence, financial understanding, and engagement.

This requires a shift away from designing primarily for the "average" member, towards designing for a broader and more varied audience.

Robust foundations built on key design principles should include;

- **User-centred design:** Focusing on how members actually interact with services, supported by insight and testing from those most likely to be impacted.
- **Simplification and clarity:** Reducing complexity in communications and journeys, particularly at key decision points.
- **Layered information:** Structuring content so that members can access simple explanations first, with the option to explore further detail.
- **Inclusive support:** Ensuring digital services are complemented by alternative channels, allowing members to move between digital and human support where needed.

Designing for a diverse membership in this way typically improves the experience for all users. Clarity, simplicity, and flexibility is key.

User testing

User testing is critical to ensuring that digital journeys are genuinely inclusive. Designing services based on assumptions risks excluding groups with lower digital confidence or less familiarity with pensions.

Firms can test portals, apps, dashboard journeys, and communications with those most likely to be digitally excluded such as older savers, disabled savers, people with low digital skills and people who use assistive technology before full roll-out. The Pensions Dashboards Programme is already doing this, including targeted recruitment of users with low digital skills or confidence and users with access needs.[17]

Regulators can encourage a more inclusive approach by expecting schemes and providers to test with a diverse range of users. Importantly, this should go beyond conducting research to demonstrating how insights have led to tangible improvements in design and usability.

Maintain multi-channel access

While digital channels offer efficiency, they are not suitable for all members in all circumstances. Maintaining access to human support is an important safeguard against exclusion and helps build trust in the system.

Firms can publish phone numbers, postal routes, and human-help options prominently in member communications and online journeys, instead of assuming digital self-service will work for everyone. Continuing to offer high-quality telephone, postal and in-person services, where possible, can ensure customers are able to complete all key tasks without using the internet.

Regulators can reinforce the expectation that alternative forms of support remain available, particularly at key life events such as retirement, bereavement, or ill health.

> *Maintaining access to human support is an important safeguard against exclusion and helps build trust in the system.*

17 **Pensions Dashboards Programme, Testers wanted for MoneyHelper Pensions Dashboard, March 2026:** https://www.pensionsdashboardsprogramme.org.uk/publications/news/testers-wanted-for-moneyhelper-pensions-dashboard

18 **Government Digital Service, Understanding WCAG 2.2, October 2023:** https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag#meeting-government-accessibility-requirements

19 **Financial Conduct Authority, Consumer Duty:** https://www.fca.org.uk/firms/consumer-duty

20 **The Pensions Regulator, General principles for member communications, 2024:** https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice/communications-and-disclosure/information-to-members/general-principles-for-member-communications

Measure, and focus on, member outcomes

As digital delivery continues to evolve there is a risk that efficiency and innovation, rather than member outcomes, become the primary focus.

Regulators also have a key role to play by setting clear expectations, encouraging evidence-based design, and reinforcing the importance of inclusion. Success should be measured not by the presence of digital tools, but by whether members are able to engage with their pension in a way that supports informed decisions, better retirement outcomes, and overall value for money.

Pension providers should track who drops out of digital journeys, who asks for offline help, who uses Pension Wise, and whether outcomes differ by age, disability, confidence, or other vulnerability markers.

Digital exclusion is highly intersectional, and individuals may fit into multiple groups. Therefore, better quality member data can help to more accurately identify and then provide appropriate support to vulnerable groups.

Treat identity and login barriers as inclusion issues

Professionals can review verification, login, and security steps to identify where they unintentionally exclude people, especially where those steps rely on photography, smartphones, or complicated authentication. Regarding Multi-Factor Authentication, the pensions industry can help consumers overcome the MFA barrier without exposing them to scam risks, by adopting three strategies:

> **Offer Flexible Authentication:** Provide low-friction alternatives to smartphone apps, such as using device biometrics (fingerprint/facial scans), landline voice calls to read out codes, or physical security tokens.

> **Apply "Risk-Based" MFA:** Do not require MFA for low-risk actions like checking a pension balance. Enforce it strictly only for high-risk changes, such as modifying bank details or initiating a transfer.

> **Extend Timeout Windows:** Lengthen the expiration time of One-Time Passwords (OTPs). For example, from 30 seconds to 5-10 minutes, allowing users with limited dexterity or digital confidence ample time to enter the code.

> **Password visibility option:** A useful accessibility and usability feature that can reduce errors and frustration for many users, including some disabled and neurodivergent people. While it is not essential for everyone, providing a user-controlled show/hide password option is generally considered inclusive design.

Minimum accessibility standards

A key foundation is the establishment of clear and consistent expectations for accessibility. Digital services such as websites, apps, member portals, and digital tools should be designed and tested in line with the Web Content Accessibility Guidelines (WCAG), the recognised UK benchmark for digital accessibility. WCAG 2.2 AA requires digital services to be perceivable, operable, understandable, and robust, incorporating features such as screen-reader compatibility, keyboard navigation, high-contrast displays, resizable text, accessible forms, and the use of clear, understandable language.[18]

However, accessibility should not be viewed purely through a technical lens. It also relates to how pensions information is structured and explained. Regulators can reinforce this by linking accessibility more explicitly to existing frameworks, such as the Financial Conduct Authority (FCA) Consumer Duty[19] and The Pension Regulator's (TPR) expectations on effective communications.[20]

Offer access adjustments as standard

Providers, administrators, and advisers can offer longer appointments, joint calls, translators, and arrangements for someone to attend on the member's behalf. These access adjustments should be offered to members as part of a provider's standard service, not just in response a request after something has gone wrong.

This should be framed as service flexibility, not as a response to something being "wrong" with the member. The emphasis should be on removing barriers created by the process, environment, or tool, so that members can engage in the way that works best for them without having to disclose personal circumstances or feel judged.

Train frontline teams to spot digital exclusion quickly

Advisers, administrators, and member-service staff can be trained to recognise when a saver is struggling with digital access, and to move them promptly to a more suitable channel or support route.

Enable safe, supported access rather than insecure workarounds

Providers can create controlled ways for a trusted person to support a saver, particularly where the saver has low confidence, low vision, cognitive barriers, or language needs. This can help to prevent increased risk of security breaches or fraud resulting from members using informal workarounds such as password sharing or shared devices.

Build signposting to MoneyHelper and Pension Wise into retirement and transfer journeys

Professionals can routinely direct savers to impartial guidance before high-impact decisions such as accessing benefits, consolidating pots, or considering transfers. This can help to ensure that as well as simply having access to information, savers understand its significance and the choices available to them.

Governance and accountability

Digital inclusion should be embedded within governance frameworks, rather than treated as a standalone issue. Trustees and providers increasingly need to understand how different groups interact with digital services, where barriers arise, and how they are addressed.

Over time, this may require more structured oversight, with digital inclusion considered alongside value for money, engagement, and member outcomes.

AI and digital inclusion

Recent guidance from The Pensions Regulator on AI provides a useful lens on how digital innovation should be approached.[21]

AI has the potential to improve member engagement, for example by enabling more personalised communications and making it easier for members to access relevant information. However, it also introduces new risks, including bias in automated decision-making, lack of transparency, and increased exposure to scams or fraud.

TPR has made clear that responsibility for member outcomes remains with trustees and providers, regardless of whether services are delivered using AI. It also highlights the importance of;

> strong governance and oversight;
> effective testing and monitoring;
> high-quality data;
> and active management of risks.

These expectations reinforce the broader point that innovation must be implemented in a way that supports inclusive outcomes. AI has the potential to both improve accessibility and exacerbate exclusion, but this will be dependent on how it is designed and governed.

Creating the right regulatory environment

As set out above, simplicity and clarity are key principles of inclusive design. However, additional requirements introduced by regulations or guidance may make this more difficult for providers to achieve.

For example, disclosure requirements on communications such as benefit statements or retirement projections may require providers to provide more detail, in order to protect against legal or regulatory risk.

To support providers in their efforts to provide communications and products which are simple, clear, and accessible, policymakers and regulators should proactively consider digital inclusion when drafting regulations and guidance, so that providers are better placed to ensure digital inclusion is central to their offer.

Partnership with local community organisations

Pensions professionals can work with charities, libraries, local authorities, and community hubs that already deliver trusted digital support to excluded groups. The government's Digital Inclusion Action Plan places strong emphasis on hyperlocal support and community-based delivery as the best route to reaching many people who are excluded.[22]

Sharing best practice

The challenges associated with digital inclusion are often common across the industry. There is significant value in collaboration and the sharing of practical solutions and best practice.

Regulators and industry bodies, such as the SPP, can support this through:

> Facilitating industry forums
> Providing practical guidance or toolkits
> Publishing case studies

A coordinated approach would help accelerate progress and reduce duplication of effort.

21 **The Pensions Regulator, AI Plan, May 2026:** https://www.thepensionsregulator.gov.uk/en/document-library/corporate-information/ai-plan

22 **Department for Science, Innovation & Technology, Digital Inclusion Action Plan: First Steps, February 2025:** https://www.gov.uk/government/publications/digital-inclusion-action-plan-first-steps/digital-inclusion-action-plan-first-steps

Best practice in inclusive digital design

A number of organisations already provide examples of how digital services can be designed in a more inclusive and accessible way.

- **MoneyHelper** demonstrates the value of clear, jargon-free language, well-structured journeys, and support for different levels of financial understanding. Its digital offering is complemented by telephone guidance, recognising that members engage in different ways.
- **Pension Wise** combines digital pathways with human interaction, helping individuals approaching retirement to navigate complex decisions with greater confidence.
- **The Government Digital Service** provides a broader benchmark for accessible design, particularly in its use of plain English, consistent navigation, and iterative user testing. It demonstrates that complex information can be made more usable without losing its substance.[23]

23 **Government Digital Service and Central Digital and Data Office, Guidance and tools for digital accessibility, 2026:** https://www.gov.uk/guidance/guidance-and-tools-for-digital-accessibility

Conclusion

Digital transformation is now central to the pensions industry, with tools such as member portals, pensions dashboards and AI offering significant opportunities to improve engagement, efficiency, and decision-making.

However, as this paper has shown, these benefits are not evenly distributed, and digital exclusion remains a material risk across the system.

Digital exclusion in pensions is driven by more than just a lack of access to devices or connectivity. It also reflects differences in digital confidence, accessibility needs, affordability, usability of systems, and life events that can reduce an individual's ability to engage. Importantly, it affects people across all age groups and can arise at the moments when members most need support.

The consequences are significant: reduced engagement, poorer retirement decisions, and increased vulnerability to scams and fraud. As reliance on digital channels grows, these risks become more pronounced.

In response, several clear priorities emerge:

Digital inclusion must be treated as a design principle, not a remedial measure.
This should be embedded from the outset rather than retrofitted after exclusion is identified.

Digital-first must not become digital-only.
High-quality alternative channels (telephone, postal, and in-person support where appropriate) maintained for those who need them.

Services must be simplified and made more accessible.
This includes clearer communications, plain English design, and compatibility with assistive technologies.

Authentication and identity verification processes should be proportionate and flexible.
This should help avoid unnecessary barriers while maintaining security.

AI and digital tools must be deployed responsibly.
This includes paying attention to transparency, bias, and the risk of excluding those least able or willing to engage with automated systems.

Industry, regulators, and government each have distinct roles.
These range from setting accessibility standards and expectations, to improving data quality, supporting skills and confidence, and promoting best practice.

The central challenge for the pensions industry is therefore not simply to digitise services, but to ensure that digital innovation improves outcomes for all members, with no one left behind.

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Founded in 1958 as the Society of Pension Consultants, today SPP is the representative body for a wide range of providers of pensions advice and services to schemes, trustees and employers. These include actuaries, accountants, lawyers, investment managers, administrators, professional trustees, covenant assessors, consultants and pension specialists.

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Further information

If you have any queries or require any further information about this discussion paper, please contact the SPP's Director of Policy & PR, Phil Hall phil.hall@the-spp.co.uk or telephone 07392 310264

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