

CONSUMER
DATA
STANDARDS

Data Standards Body

Consumer Experience Workstream

Consultation Draft 5 | Joint Account Election and Authorisation | 26.03.20

Context

Part 4 of the CDR rules ([found on the ACCC website](#)) outlines a requirement for CDR data holders to implement a **joint account management service** through which consumers with joint accounts can set preferences in relation to CDR data sharing from the joint account.

Both joint account holders must have elected to share CDR data from the account in order for consumer data requests to be made in respect of that account.

These preferences apply at the account level, but a data holder may also provide functionality that permits joint account holders to allow multi-party authorisation of individual data sharing arrangements. This is optional for the current version of the rules.

However, data holders are expected to work towards implementing multi-party authorisation as it is intended to become a requirement in the future.

It is understood from this part of the rules that a joint account must be elected prior to it appearing in the authorisation flow.

The ACCC is considering whether to amend the rules to accommodate joint account elections being offered in the authorisation flow. This would be optional and not affect current implementation in accordance with the existing rules. The ACCC is mindful that the November timeframe for joint accounts is fast approaching and any implementation decision should not create additional requirements that would impact build timelines.

This decision proposal articulates two options for joint account election and authorisation to be considered for Phase 3 implementation but also an 'ideal state' to work towards in the near future.

This decision proposal has been written to obtain community feedback on these options, and any other options that are raised for consideration, prior to a recommendation for a final proposal being made to the Data Standards Chair.

Decision to be made

This consultation is being conducted to determine the range of desirable options and feasible timeframes for a consistent joint account election and authorisation experience.

These options should reduce drop off risk for joint account holders and provide simple, informed, and trustworthy data sharing experiences with positive short and long term outcomes.

These options should also consider both consumers associated with the joint account, not just the joint account holder initiating the consent.

This proposal assumes that the options in this paper (Proposal 1 and 2) could exist in tandem, both containing mandatory requirements, and DHs would simply comply with the requirements within each option. This is proposed to accommodate varying implementations in the first instance, but with a view to move to a more consistent election and authorisation approach in the future.

Feedback for this paper is planned to close on 9th April 2020.

In particular, the Data Standards Body (DSB) would like to receive:

1. **Views on joint account election and authorisation** from the community, but especially data holders required to implement joint accounts in 2020 and 2021
2. **Feedback on the specific options** presented in this paper, along with any other options raised for consideration
3. **Time estimates for successful implementation** of the options in this paper, and any other options raised for consideration.

***NB** Feedback should consider DH obligations for their respective implementation timelines of November 2020 and subsequent 2021 implementations.*

Key questions

In consultation with the ACCC the DSB has identified two key questions.

The answers to which will substantially shape any standards and guidelines created for *joint account authorisation* under the CDR regime:

1. **Should joint account election be permitted to occur in the authorisation flow?**
2. **If not, should the authorisation flow provide information on unavailable accounts and provide instructions for election?**

Clarifications and Assumptions

Joint accounts are currently defined in the CDR Rules as a joint account with a data holder for which there are 2 joint account holders, each of which is an individual who, so far as the data holder is aware, is acting in their own capacity and not on behalf of another person.

For the purposes of this paper, Joint Account Holder 1 (**JAH1**, AKA the ‘requestor’) is the person who initiated the consent and the person who provides a request to the other joint account holder to make the joint account available for sharing. Joint Account Holder 2 (**JAH2**, AKA the ‘approver’) is the other consumer associated with the joint account who receives the request from JAH1, and who is required to approve the election before the joint account is available for sharing.

- ‘Account level’ authorisation is also known as ‘1 to authorise’.
- ‘Multi-party’ authorisation is also known as ‘2 to authorise’.

Accounts are separate to consents. In the context of joint accounts, this means:

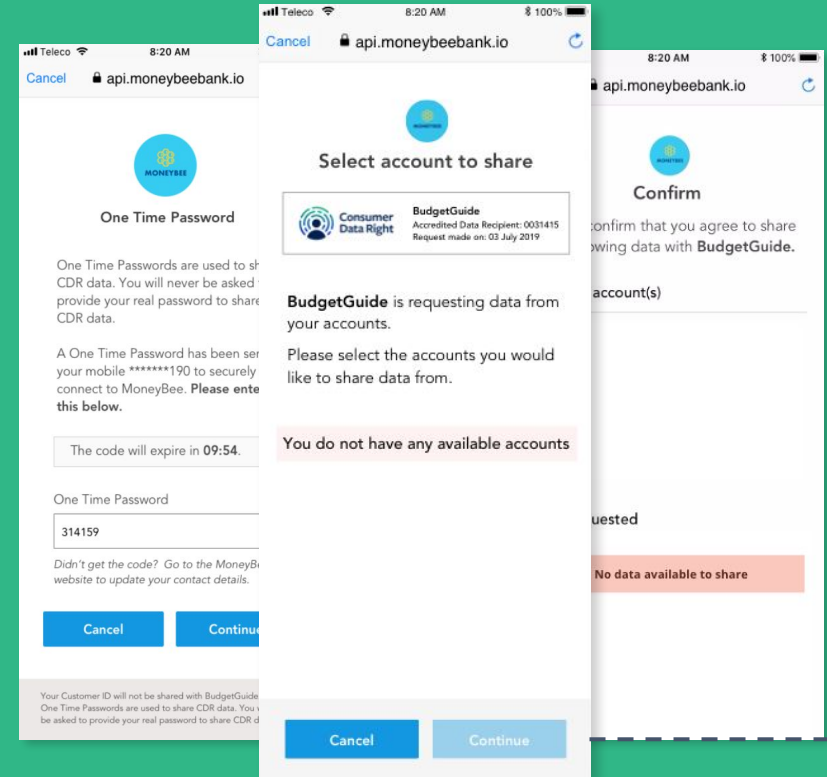
1. There are no ‘partial’ consents as JAH2’s approval of any joint account election would occur separate to the authorisation flow.
2. If JAH2 were to decline the election request, or if they were to later on remove their joint account election, it would only stop data being shared from that joint account. That is, removing a joint account election would not ‘revoke’ or withdraw the consent itself. Only JAH1 can withdraw consent.
3. JAH1 can, in theory, ‘authorise’ a consent without having selected any accounts to share data from.

NB The CDR Rules will need to be amended to authorise the creation of standards relating to the election options in this paper. Authorisation standards are already authorised in the rules.

Joint Account Election

The following issues need to be considered:

1. The Consent Flow is likely where a consumer will first encounter the concept of CDR and joint account sharing.
2. Consumers are unlikely to opt-in until they see the value of doing so, and as such we consider it unlikely that consumers will pre-elect via a JAMS.
3. If a joint account is not available in the authorisation flow, DHs are not permitted to show 'unavailable' accounts, nor provide instructions for how to elect those accounts.
4. If a consumer only has joint accounts with a DH, this means no accounts will be presented.



Scenario: All of a consumer's accounts are joint accounts; DH does not provide information on unavailable joint accounts or provide instructions for electing joint accounts

PROPOSAL 1

In-flow Notification

Proposed commencement date: November 2020

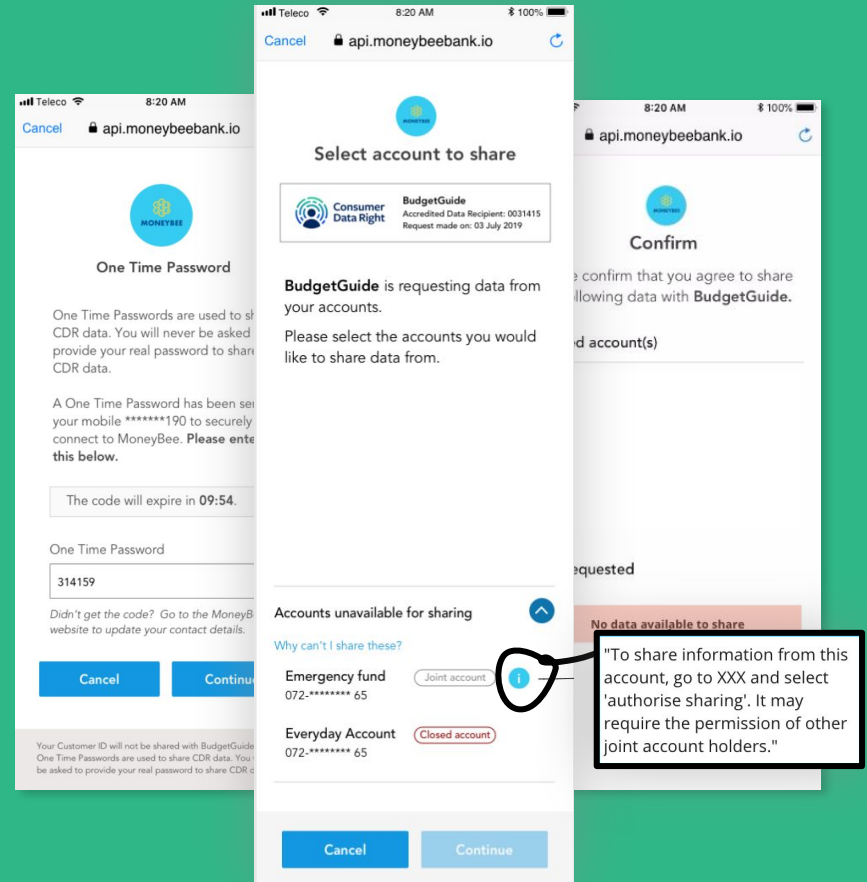
Data holders **MUST** show unavailable joint accounts in the authorisation flow at the account selection step. If un-elected, data holders **MUST** provide instructions for how to elect the joint account(s). The election step **MAY** allow JAH1 to choose '1 to authorise' or '2 to authorise'.

If elected, data holders **MUST** provide instructions (as in-line help) for how to change joint account preferences in the joint account management service, and this **MUST** also state what the current election preference is.

Data holders **MUST** provide information to JAH1 and JAH2 during the account election process. This **SHOULD**:

1. State that JAH2 will be required to approve the election
2. State that '1 to authorise' will allow both account holders to share data independently, without the approval of the other account holder
3. State that '2 to authorise' (if implemented) will require both account holders to approve the sharing of data from that joint account every time it occurs
4. Provide instructions for where and how to change these preferences

The request sent to JAH2 **MAY** also allow them to choose '1 to authorise' or '2 to authorise'. A '2 to authorise' preference by either account holder **SHOULD** always supercede a '1 to authorise' preference.



Scenario: In-flow notification showing an unavailable joint account that also provides election instructions.

In-flow Election

Proposed commencement date: Optional for November 2020 subject to rules change

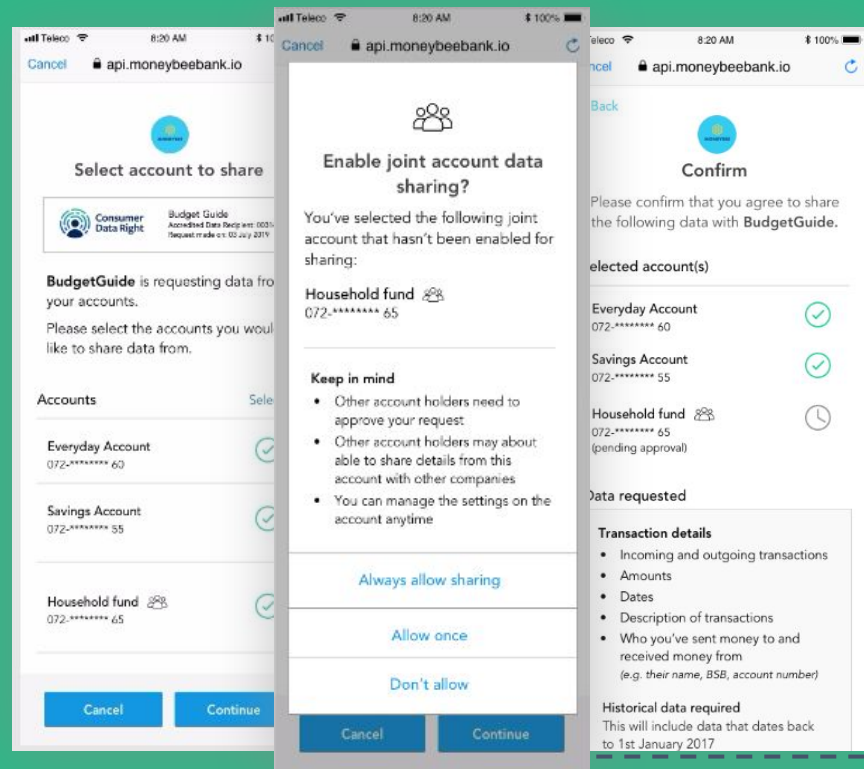
Data holders **MUST** allow consumers to elect a joint account during the authorisation flow. This step **MUST** allow JAH1 to choose '1 to authorise' or '2 to authorise', as well as decline the election.

If elected, data holders **MUST** provide instructions (as in-line help) for how to change joint account preferences in the joint account management service, and this **MUST** also state what the current election preference is.

Data holders **MUST** provide information to JAH1 and JAH2 during the account election process. This **SHOULD**:

1. State that JAH2 will be required to approve the election
2. State that '1 to authorise' will allow both account holders to share data independently, without the approval of the other account holder
3. State that '2 to authorise' will require both account holders to approve the sharing of data from that joint account every time it occurs
4. Provide instructions for where and how to change these preferences

The request sent to JAH2 **MUST** also allow them to choose '1 to authorise' or '2 to authorise'. A '2 to authorise' preference by either account holder **MUST** always supercede a '1 to authorise' preference.



Scenario: In-flow election that allows a '1 to authorise' or '2 to authorise' preference to be made, along with information relating to account election and sharing.

Feedback

Feedback for this paper is planned to close on 9th April 2020.

The community is invited to provide feedback on this paper on the relevant [CX consultation page](#) and on [GitHub](#).

Feedback will also be accepted via email to cdr-data61-cx@csiro.au.

In accordance with the regular practice of the Data Standards Body, email submissions will be posted on GitHub and the CX consultation page to ensure transparency of the consultation process.

Where participants believe they have sensitive information to convey we will consider those discussions and give guidance on our preferred disclosure approach prior to meeting to discuss such issues. To discuss, please email us at cdr-data61-cx@csiro.au.

You can keep up to date on the CX Workstream's developments by signing up to our [mailing lists](#), subscribing to our [blog](#), and tracking issues on [Github](#).

The Consumer Data Standards website contains the latest [CX Standards and CX Guidelines](#), which are also located on the [technical standards page](#).

CX Reports containing insights and recommendations from ongoing consumer research can be found in our [Knowledge Centre](#).

You can contact the CX Workstream via email on cdr-data61-cx@csiro.au