

# Data Standards Body

## Technical Working Group

### Decision Proposal 145 - Strategy for Reporting & Metrics

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## Context

Currently the data standards provide a data holder hosted metrics API as part of the admin API's between the ACCC CDR Register and the Data Holders. The purpose of the current metrics API is to report current and historical performance and non-functional metrics.

When the metrics end point was initially defined through consultation the expectation was that it would be used for simple dashboard style reporting. The main reporting to demonstrate compliance and inform the regulators would be delivered via periodic manual reports as defined in the rules.

As the implementation of the sector has progressed it has become clear that there is an opportunity to expand systemic reporting via API data collection to the point that no other regular reporting would be required unless specifically requested of certain participants.

A strategy for investigating this opportunity has therefore been developed in consultation with the ACCC. This decision proposal is presented to allow for feedback to be provided on this strategy to ensure that the order of prioritisation makes sense for participants and that no topics have been missed.

## Decision To Be Made

Determine the consultations on changes to metrics and reporting to be conducted during 2021.

## Identified Options

The following table outlines the specific topics that are intended to be addressed via a series of consultations in 2021. Note that some of these topics are specifically related to changes to the standards but some of these topics have wider implications:

	Topic	Description
1	Endpoint Metrics	Existing reporting of NFRs via Get Metrics are aggregated across all endpoints. Breaking these down by endpoint will provide more actionable insights and a granular view of pain points and performance issues.
2	Brand Aware Metrics	Metrics are currently presented at the Data Holder level. As many second tier banks come into the system and we look towards retailer models in Energy and across sectors, metrics reportable at a data holder's brand level may enable compliance monitoring at the level of the data holder's brand-level consumer facing presence. This may allow for public dashboard reporting to be presented at the brand level as well.
3	CX Metrics for Data Holders	There are no consumer experience metrics. This makes it difficult to improve completion rates, remove pain points and learn from real consumer behaviour how the ecosystem can be optimised. Linking CX research to real-world performance will also create improved research models and assist with prioritising future changes. Capture user journey times, completion rates, drop off points as well as metrics to measure consent outcomes such as consumer comprehension, consumer recall, propensity to share and trustworthiness.
4	Public Reporting and Dashboards (ACCC / CDR Register)	Consult on the issues around the creation of publicly accessible resources including dashboards that publish overall ecosystem performance including load, response times, CX bottlenecks and completion rates as well as conformance and regression testing. Long term, measuring and reporting on trustworthiness, consumer comprehension, consumer recall and propensity to share along with other outcome-based metrics.
5	Conformance Monitoring (ACCC / CDR Register)	For compliance monitoring to be successful it needs to be highly automated and alert on conformance issues in real-time using standard incident management procedures. To be effective in shifting towards preventative compliance, capability needs to be built to repeatedly run conformance and compliance checks across all participants. Conformance testing must be kept up to date with Rules and there are unique opportunities to build out draft rules and conformance tests before they become binding as canary tests to prepare the ecosystem.
6	Refusals and Error Handling	Rejections are currently very coarse grained and offer little insight into the reasons why a given data request is refused. This conflates the issue of refusals and makes compliance difficult resulting in a higher level of interrogation and intervention from an enforcement perspective.

		Further to this, there is no consistent definition or classification for refusal reasons meaning different DHs infer refusals inconsistently.
7	Consent Metrics	Metrics to define the reasons for withdrawal as well as the channel of withdrawal to assist developing better insights models on consumer behaviour and opportunities for optimisation.
8	Testing and Assurance	<p>Regression testing / functional testing as a set of automated reportable metrics. The test reports would be available via a public dashboard to track quality over time as well as assisting compliance efforts to monitor the health of the ecosystem at large as well as individual participants for trends and problems.</p> <p>This topic will consult on how the automated testing, that that can scale towards self-certification and real-time evidence-based reporting of issues, warnings and failures across defined conformance test suites, may be incorporated into the CDR. This would uplifts the software quality across the ecosystem and reduce the chance of critical bugs or trust-eroding issues creeping in. It would also reduce compliance and enforcement overheads on all participants.</p> <p>Proposals in this area must integrate with the compliance and accreditation processes of the ACCC. This will need to be taken into account during consultation.</p>
9	Data Recipient Metrics	Intermediaries will increasingly become a key component to the CDR ecosystem servicing a wide range of ADRs. Their role also involves aggregation and generation of new data. Perception of the CDR's usability will, in part, rely on the performance, reliability and timeliness of intermediaries. In addition to this, to optimise and improve the CX flow requires awareness and insight of the ADR side consumer experience. Automated ADR metrics reduce the manual reporting obligations on ADRs which is a solution that will not scale as the cohort of ADRs grows across banking and the economy.

## Current Recommendation

It is recommended that the topics identified be brought forward for consultation according to the plan described in the table below. Feedback is specifically sought on the following questions:

- Does this plan allow the community enough time to consider and respond to the issues described?
- Is the order logical and appropriate?
- Are there additional topics that should be considered?

Decision Proposal Topic	Likely Consultation Period
Endpoint Metrics	Q1 2021
Brand Aware Metrics	Q1 2021
CX Metrics for Data Holders	Q1 2021
Refusals and Error Handling	Q2 2021
Consent Metrics	Q2 2021
Data Recipient Metrics	Q2 2021
Public Reporting and Dashboards	Q2 2021
Conformance monitoring	Q2 2021
Testing and Assurance	Q2 2021

Note that period in the table above is expected to be the timing for consultation and not the timing for implementation. Implementation considerations will be a component of each of these consultations.