

# Data Standards Body

## Consumer Experience Working Group

### Noting Paper 157: CX Data Standards Following V2 Rules

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## Context

The Consumer Data Right rules were amended on the 23<sup>rd</sup> of December resulting in a range of new provisions for data holders (DHs) and accredited data recipients (ADRs). The purpose of this paper is to highlight the anticipated CX Data Standards changes arising from the v2 rules being made.

The specific changes raised in this paper will be consulted on separately, but CDR participants are invited to use this consultation to raise any concerns or impacts that have not been identified.

This noting paper focuses on CX Data Standards changes based on a review of the v2 rules. The impacts to the technical Data Standards have been covered in [Decision Proposal 153](#).

A consolidated version of the amended rules can be found on the [Federal Register](#) along with an [explanatory statement](#).

## Decision to be Made

Decide the necessary and complimentary changes to the CX Data Standards to support the implementation of the v2 rules and adoption of CDR.

## Assumptions

The current assumption is that only two areas in the v2 rules have been identified as **requiring** further CX Data Standards development. These are limited to:

1. **ADR item:** *Division 8.4, rule 8.11(1)(c)(iii)*, which requires CX Data Standards to be made for accredited person (AP) disclosures
2. **ADR and DH item:** *Division 1.3, rule 1.10A, Division 1.4, rule 1.14(3), Division 8.4, rule 8.11(1)(a)(ii)*, which relate to the separation of consents, including the separation of consent to collect and consent to use and the introduction of disclosure consents, which in culmination impact withdrawal standards

With the exception of the potential future state covered in the '[Data holder dashboards and authorisation processes](#)' issue, the current assumption is that DHs can implement the v2 rules without technical or CX Data Standards changes. As such, the majority of the anticipated DH-related changes in this noting paper are being proposed as CX enhancements to augment the intuitiveness, simplicity, trustworthiness, and comprehensibility of the consent model. This assumption is based on

analysis with the ACCC which expects the proposed CX enhancements to leverage existing technical Data Standards and the Register design where necessary.

**N.B.** *Division 8.4, rule 8.11(1)(d)* is an existing rule that requires data language standards to be made for CDR participants to use when making and responding to requests. This rule requires CX Data Standards development work to be undertaken in 2021 in relation to new sectors but is not considered to be a change arising from the v2 rules and as such is not covered in this noting paper. Data language standards were made for banking datasets in 2019. Data language standards for electricity data clusters are being developed with a view to being consulted on and finalised in Q1-Q2 2021.

## Identified Options

This noting paper contains a brief description of the anticipated CX changes in relation to specific topics. Each change discussed in this paper will be consulted on separately, but CDR participants can use this consultation to raise any concerns or impacts that have not been identified.

## Current Recommendation

This section specifies the anticipated CX Data Standards developments in relation to v2 rules changes. The structure of this section aligns with the headings in the v2 rules [explanatory statement](#).

Each section contains a table with descriptions of the proposed obligation levels and expected timing. The DSB is seeking feedback on the proposed timing listed for standards creation and compliance. The listing of 'None' under 'Proposed obligation' is included to note where no CX Data Standards are anticipated. The 'Comply by' column presents the set of options for mandatory compliance where applicable. 'N/A' denotes that a compliance date is not applicable.

### Changes to rules about consents

This topic includes amending consents, as well as the separation of consent establishment and withdrawal.

<i>Table 1. Consent changes</i>						
#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
1	Amending Consents	ADR	<b>None</b>	No additional CX Data Standards are anticipated for this item.	N/A	N/A
2	Amending Consents: authorisation flow	DH	<b>MUST</b>	Proposal to simplify the authorisation flow where a consent is being amended as outlined in <a href="#">DP144</a> .  <b>Purpose:</b> Facilitate comprehensible, intuitive, and successful consent/authorisation amendments.	Feb/March 2021	(i) July; or (ii) Nov 2021

3	Separate Consents	ADR	<b>None</b>	No additional CX Data Standards are anticipated for this item.	N/A	N/A
4	Separate Consents	DH	<b>MAY</b>	<p>An <b>optional</b> example in the CX Data Standards will be amended/removed to align with the v2 rules.</p> <p>This relates to the following <b>optional</b> message in the CX Data Standard on 'Withdrawing authorisation, redundant data':</p> <p><i>'If you haven't already, you can ask [data recipient] to delete your data when they no longer need it, but you must do this before you stop sharing.'</i></p> <p><b>Purpose:</b> Facilitate informed withdrawal processes; Provide accurate messaging examples to DHs; avoid implying a consumer's right to delete may be lost where a consent to use may continue after an authorisation has been withdrawn.</p>	Feb/March 2021	Feb/March 2021

### Authorising transfers of CDR data between accredited persons

This issue covers 'disclosure consents', specifically 'AP disclosures', which refers to a consumer consenting to disclose data from one ADR to another ADR.

#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
5	AP Disclosure	ADR	<b>TBC</b>	<p>The scope and content of this item is currently being developed with the ACCC.</p> <p><b>Purpose:</b> Facilitate informed consent for the onward disclosure of CDR data.</p>	No later than July 2021	No later than July 2021
6	AP Disclosure: withdrawal	ADR	<b>MUST</b>	<p>Proposal to have disclosure withdrawal standards reflect existing DH withdrawal standards.</p> <p><b>Purpose:</b> Facilitate informed disclosure consent withdrawal processes.</p>	No later than July 2021	No later than July 2021

## Authorising use of CDR data for research

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No CX Data Standards changes are expected as a result of this rules amendment.

## Changes to data holder obligations

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This covers joint accounts amendments and data holder dashboards and authorisation processes.

The v2 rules largely incorporate and expand on the [consultation](#) conducted in March 2020; the joint account items below have been informed by the Consumer Policy Research Centre's recent [community sector engagement on joint accounts](#), [CX research](#), and issues highlighted by the CDR community. The use of the term 'requestor' in this section aligns with Division 4.3, rule 4.9(a), meaning the person on whose behalf the consumer data request is being made.

#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
7	Joint accounts: <i>auth flow 1</i>	DH	<b>MUST</b>	<p>It is proposed that the authorisation flow CX Data Standards be updated to require a generic message to the joint account holder (the 'requestor') noting that the other account holder(s) will be alerted when an authorisation is initiated, with a statement that they should contact their DH before authorising if they have concerns.</p> <p>This notification would be presented where a joint account is already enabled for sharing, and as such is distinct to the rules requiring DHs to allow consumers to set a disclosure preference in the authorisation flow.</p> <p><b>Purpose:</b> Facilitate safe and informed authorisations where other account holders may be notified about the requestor's data sharing activities.</p>	By May 2021	Nov 2021
8	Joint accounts: <i>auth flow 2</i>	DH	<b>SHOULD</b>	<p>This item will propose that, where DHs treat a joint account like an individual account to prevent physical or financial harm or abuse, DHs should notify that joint account holder (the 'requestor') that the other account holder(s) will <b>not</b> be alerted when that authorisation is initiated.</p> <p><b>Purpose:</b> Reduce cognitive barriers to data sharing for consumers experiencing vulnerability.</p>	By May 2021	Nov 2021

9	Joint accounts: <i>auth flow 3</i>	DH	<b>MAY</b>	<p>DHs may indicate that a joint account is 'pending' further approval in the authorisation flow and include explanatory information about what this means. This may be appropriate where the 'requestor' has already indicated a disclosure option but not the other account holder(s). This could apply in the following situations:</p> <ul style="list-style-type: none"> <li>- Immediately following the requestor setting a disclosure preference as part of the authorisation flow to indicate that further approval is required</li> <li>- In the account selection step where an invitation to indicate a disclosure option has already been sent to the other account holder(s)</li> <li>- Where a 'co-approval' option has been chosen by the joint account holders to indicate that the requestor's authorisation will not result in the disclosure of data from that joint account until the other joint account holder(s) approve.</li> </ul> <p>How this standard is implemented is at the discretion of DHs, who will need to consider existing eligibility requirements and situations where it may be necessary to treat a joint account differently to prevent physical or financial harm or abuse.</p> <p><b>Purpose:</b> Increase <a href="#">system status visibility</a> to help users understand when further action is needed to successfully share joint account data.</p>	By May 2021	Nov 2021
10	Joint Account Management Service (JAMS)	DH	<b>None</b>	No additional CX Data Standards are anticipated for this item.	N/A	N/A

## Data holder dashboards and authorisation processes

This topic covers the presentation of ADRs by DHs in the authorisation flow and DH dashboard. The genesis of this issue can be found in [issue 222](#), where a range of possibilities were raised to achieve consistent and comprehensible presentation of ADRs in DH spaces.

*Table 4. DH dashboards and authorisation*

#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
11	CX of DH dashboards and authorisation	DH	<b>MUST</b>	<p>This will propose an <b>interim state</b> that DHs use specific fields where DHs refer to ADRs in the authentication/authorisation flow, consumer dashboard, and related consumer-facing artefacts.</p> <p>This item will also initiate consultation on a <b>future state</b> to explore if and how new fields have utility, such as an additional field to distinguish concurrent consents on DH dashboards.</p> <p>Following this consultation, the DSB will liaise with the rules and Register teams to assess where and how these obligations will be developed.</p> <p><b>Purpose:</b> Achieve comprehensible and contextually appropriate presentation of ADRs during authentication, authorisation, and authorisation management.</p>	<p><b>Interim state:</b> by May 2021</p> <p><b>Future state:</b> TBC</p>	<p><b>Interim state:</b> Nov 2021</p> <p><b>Future state:</b> TBC</p>

## Changes to who may share CDR data

The amended rules allow CDR data to be shared by non-individuals, in the context of business partnerships, and by secondary users. No CX Data Standards are anticipated beyond what is outlined below.

*Table 5. Eligibility*

#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
12	Non-individual consumers: authorisation flow	DH	<b>MAY</b>	An optional notification that may be presented during the authorisation flow. This would apply in the scenario where the person who successfully authenticated is not a nominated representative, and as such does not have access to any accounts to share data from.	By May 2021	Nov 2021

				<p>The content of the notification would be at the DH’s discretion, but could, for example:</p> <ol style="list-style-type: none"> <li>1. Provide instructions for how to become a nominated representative</li> <li>2. Initiate the process to become a nominated representative, such as by sending a request to become a nominated representative to the appropriate person</li> </ol> <p><b>Purpose:</b> Facilitate non-individual consumer data sharing</p>		
13	Business partnerships: authorisation flow	DH	<b>MAY</b>	<p>The proposal for ‘non-individual consumers: authorisation flow’ would be extended to the equivalent business partnerships scenario.</p> <p><b>Purpose:</b> Facilitate business partnership data sharing</p>	By May 2021	Nov 2021
14	Secondary users: authorisation flow	DH	<b>MAY</b>	<p>The proposal for ‘non-individual consumers: authorisation flow’ would be extended to the equivalent secondary users scenario.</p> <p><b>Purpose:</b> Facilitate secondary user data sharing</p>	By May 2021	Nov 2021
15	Secondary users: instruction	DH	<b>None</b>	<p>No additional CX Data Standards are anticipated for this item.</p> <p>CX Guidelines may be developed reflecting messaging provided to joint account holders when indicating a disclosure option.</p>	N/A	N/A
16	Secondary users: withdrawal	DH	<b>TBC</b>	<p>A notification to the account holder where a secondary user instruction is being removed. This would let the account holder know that the secondary user’s existing sharing arrangements and future ability to share would be impacted by the removal of the secondary user instruction.</p> <p><b>Purpose:</b> Facilitate informed withdrawal processes for accounts with secondary users</p>	By May 2021	November 2021

## Use of the CDR logo

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This refers to CDR logo use

#	Issue	Entity	Proposed Obligation	CX Standard description	Standards made by:	Comply by:
17	CDR logo	ADR/DH	None	No additional CX Data Standards are anticipated for this item.	N/A	N/A

## Implementation Considerations

The specific items raised in this paper will be consulted on separately, during which the implementation considerations will be explored. CDR participants are encouraged to raise any concerns or impacts ahead of those targeted consultations.