

Data Standards Body

Consumer Experience Working Group

Decision Proposal [162](#): Joint Accounts

Contact: Michael Palmyre

Publish Date: 9 November 2021

Feedback Conclusion Date: 30 November 2021

Context

This decision proposal relates to Consumer Experience (CX) Standards for joint accounts. The options in this paper progress from [Noting Paper 207](#) to reflect the [v3 Rules](#), which were made on 30 September 2021.

This paper seeks to define CX standards to support intuitive, safe, and informed joint account sharing and management.

The v3 rules were amended on 30 September 2021 to support a 'single consent' model for joint accounts. Division 4A.2 sets out the following key provisions:

- the three disclosure options, with the default option being the pre-approval option;
- the disclosure option management service (DOMS) for joint accounts where joint account holders can change the disclosure option or propose to change to the other account holders
- if multi-party agreement is required, the process by which the other joint account holders can either agree with or reject the proposal to change the disclosure option; and
- some associated notification requirements.

The rules refer to data standards in the following areas that are relevant to this consultation:

- 4A.6(8), which states that the DOMS must be in accordance with the data standards
- 4A.14(1), which states that approval notifications must be in accordance with the data standards
- 4A.14(3), which states that joint account notification settings must be provided in accordance with any relevant data standards
- 1.15, in relation to Data Holder (DH) dashboards in general
- Division 4.4, which relates to authorisations to disclose CDR data

Data standards have been identified in relation to several areas, including for:

- [Joint account notifications](#)
- [Notification alerts](#)
- [Vulnerable joint account holders](#)
- [Pending disclosures](#)
- [Ceasing joint account data sharing](#)

Elements of this decision proposal have been consulted on extensively throughout 2020 and 2021. This decision proposal has been informed by the following:

1. [Noting Paper 207 consultation](#)
2. [Noting Paper 157 consultation](#)
3. [Draft v3 Rules consultation](#)
4. Design Paper: [an opt-out data sharing model](#)
5. Public joint accounts workshop in March 2021. See [public workshop Miro Board](#)
6. [Phase 3 CX research](#) – Rounds 1, 2, 3 and, 6
7. Consumer Policy Research Centre (CPRC) report: [Joint accounts & the Consumer Data Right](#)

Given the extent of consultation that has already occurred on this topic, and the community request for significant implementation time for joint accounts, the Chair has approved a consultation window of 21 days rather than the typical 28 days. This will provide additional time to the 6-month lead time requested by the community to date.

NB: This paper uses the term ‘requester’ or ‘JAH-A’ to refer to Joint Account Holder A, and ‘JAH-B’ is used to refer to all other relevant joint account holders. The v3 Rules also support joint accounts with more than 2 account holders.

Decision to be Made

1. Determine the appropriate joint account notification standards
2. Determine appropriate standards to support intuitive and informed joint account sharing and management
3. Determine appropriate obligation levels for any proposed standards

Identified options

Joint Account Notifications

Rule 4A.14 explains that JAH-B must receive notifications when JAH-A (the requester) has given, amended, or withdrawn an authorisation, or that authorisation has expired.

JAH-A must be notified if any approval(s) for disclosure have not been given within a specified time frame, and when JAH-B has withdrawn an approval.

Notifications must be provided ‘as soon as practicable after the event occurs, unless the joint account holder has selected an alternative schedule of notifications.’ These notifications must be provided through the data holder’s ‘ordinary means of contacting the joint account holders.’

Consultation to date has highlighted the possibility of notification fatigue and the need for consumers to have control over their own notifications. In relation to joint account notifications, the rules state that DHs must, in accordance with any relevant data standards:

- provide for alternative notification schedules (including reducing the frequency of notifications or not receiving notifications); and

- give each joint account holder a means of selecting such an alternative, and of changing a selection

The options in this section outline how these outcomes might be supported. Proposals outlined below for new standards are not mutually exclusive.

For design concepts illustrating options 2, 3, 5, 6, 7, 8, see [Miro](#) | [PDF](#)

Option 1: No change

Taking this approach would mean that the level of control over joint account notifications will be at the discretion of each Data Holder (DH). This option will create the risk of inconsistent implementations and consumer control mechanisms for joint accounts in CDR, as well as ambiguity where the data standards could provide clear parameters and consistency. This option is not recommended.

Option 2: Notification Frequency

The rules require DHs to allow consumers to receive joint account notifications less frequently. This option outlines a proposal for reducing joint account notifications by receiving a summary of notifications in a periodic update.

This proposal would be articulated in the standards as follows:

DHs SHOULD offer consumers the ability to receive their joint account notifications as a periodic summary. This MAY, for example, outline all joint account activity that occurred over the past month. This MAY also, for example, be provided with or in relation to other CDR notifications such as a CDR Receipt, which is optional for DHs. The frequency and content for such a summary is at the DH's discretion.

Option 3: Granular Control

This option includes a proposal for DHs to allow consumers to choose to receive specific joint account notifications.

This proposal would be articulated in the standards as follows:

DHs SHOULD offer consumers the ability to specify which joint account notifications they do and do not want to receive. This MAY, for example, allow a relevant joint account holder to only receive notifications when the requester gives or amends an authorisation.

Option 4: Turn Off Notifications

This option outlines a proposal for DHs to allow consumers to switch off all joint account notifications. Option 3 could achieve the outcome of Option 4, however Option 4 is less specific.

This proposal would be articulated in the standards as follows:

DHs SHOULD allow consumers to elect to no longer receive joint account notifications.

Option 5: Consequences of Amendment

This option includes a proposal for DHs to provide information to the consumer when they are amending their joint account notification schedule.

This proposal would be articulated in the standards as follows:

DHs MUST notify the consumer of the consequences of amending their joint account notification schedule. This notification MUST include instructions for how to amend this schedule or reverse the amendment.

Option 6: Means to Amend Notifications – Contextual

This option includes a proposal for the means of selecting an alternative notification schedule and changing a selection.

This proposal would be articulated in the standards as follows:

DHs MUST provide a mechanism or entry point for a notification schedule to be amended from or in relation to the notification itself. The specific implementation is at the DH's discretion.

This MAY, for example, allow a consumer to stop receiving the type of notification(s) from the notification itself. The notification MAY also, for example, provide a link to or instructions for how the joint account notification schedule can be amended.

Option 7: Means to Amend Notifications – Channels

This option outlines standards for where a consumer can amend their notification schedule.

This proposal would be articulated in the standards as follows:

DHs SHOULD allow a consumer to amend their notification schedule in line with existing notification management channels and experiences. This MAY, for example, allow the joint account notification schedule to be amended in the same location as other notifications.

Option 8: Notification Content – Review Authorisation

This option outlines instructions for reviewing the authorisation in relation to a joint account notification.

This proposal would be articulated in the standards as follows:

DHs **MUST** provide a link to or instruction for how the authorisation can be reviewed from or in relation to the notification itself.

Notification alerts

Joint account notification provisions help inform each relevant joint account holder about their joint account data being shared. This has been supported by consultation and community sector engagement to date, though it has also been noted that this same measure may put vulnerable consumers at risk.

Rule 4A.15 provides an exemption for data holders to not comply with certain joint account requirements, such as notifications, where the data holder considers it necessary to prevent physical, psychological, or financial harm or abuse to any person. This rule provides ways for DHs to mitigate the identified risk to vulnerable consumers. However, it has also been noted that DHs may not have the capability to identify vulnerability, and that even where the capability exists, DHs may not always be aware that a consumer is vulnerable.

Noting the above risks, this section outlines a proposal for a joint account holder to be notified where an action they are about to take may result in the other joint account holder(s) being notified or made aware of their actions. This section proposes that the relevant joint account holder be alerted to this fact before they perform the action. This may, for example, include the establishment of an authorisation, the updating of joint account holder dashboards, amending a disclosure option, or removing an approval.

For design concepts illustrating option 2, see [Miro](#) | [PDF](#)

Option 1: No change

No standards will be made that require DHs to alert the relevant joint account holder that an action they are about to take may alert the other joint account holder(s). This approach may put vulnerable consumers at risk and is not recommended.

Option 2: Contextual Alert

This option proposes that DHs alert the relevant joint account holder that an action they are about to take may result in the other joint account holder(s) being notified. This approach helps mitigate the risks outlined above.

This proposal would be articulated in the standards as follows:

DHs MUST alert a joint account holder where an action they are about to perform may result in the other joint account holder(s) being notified. This standard applies to the authorisation flow, consumer dashboards, and the disclosure option management service where notifications to the other joint account holder(s) may be triggered. The precise wording of this notification is at the discretion of the DH.

Vulnerable Joint Account Holders

This section tends to where a DH has leveraged rule 4A.15 and considers it necessary to not comply with relevant joint account requirements in Part 4A to prevent physical, psychological, or financial harm or abuse to any person. In this scenario, a DH can treat a joint account like an individual account so that equivalent dashboard requirements and joint account notifications do not apply. Consumer research suggests that this will help remove barriers to data sharing for vulnerable joint account holders.

However, research also suggests that joint account holders expected the other joint account holder to be notified by default. To correct this assumption where rule 4A.15 is applied, this section proposes that joint account exemptions be made apparent to the vulnerable joint account holder (as the requester) in the authorisation flow.

For design concepts illustrating option 2, see [Miro](#) | [PDF](#)

Option 1: No Change

No standards will be made that require DHs to notify the vulnerable requester that the other joint account holder(s) will not be alerted. This option is not recommended.

Option 2: Authorisation Alert

This option proposes standards for DHs to alert the flagged requester that authorising data sharing **will not** result in the other joint account holder(s) being notified. This approach will help mitigate the risks outlined above.

The proposed standard would be as follows:

Where rule 4A.15 is leveraged to allow a vulnerable requester to share their joint account data as if it were an individual account, the DH MUST alert the requester that the other joint account holder(s) will not be notified. This SHOULD be applied where appropriate for joint account management in general, including the consumer dashboard and DOMS.

Pending Disclosures

If a DH provides support for the (optional) co-approval disclosure mechanism, data sharing from a joint account will only occur if the other joint account holder(s) provide approval. This means that data from a joint account may not be disclosed at the same time as the requester provides their authorisation. The potentially delayed disclosure, and the need for additional approval(s), is not apparent to the requester during the authorisation process. This scenario may apply to other scenarios, such as non-individual accounts, partnerships, and secondary user sharing.

Rule 4.24 states that DHs must not provide additional information during the authorisation process beyond that specified in the data standards and rules. In the case of a joint account with a co-approval preference, this would mean that currently DHs would not be authorised to indicate in the authorisation flow that further action is required before joint account data can be disclosed.

This section contains a proposal for a data standard to allow DHs to indicate, in the authorisation flow, that an account is 'pending' further actions or approvals and include explanatory information about what this means.

For design concepts illustrating option 2, see [Miro](#) | [PDF](#)

Option 1: No Change

No standards will be made to allow DHs to provide additional information in the authorisation flow for accounts that require further actions or approvals. This option is not recommended.

Option 2: Pending Status Provisions

This option proposes that DHs provide additional information in the authorisation flow for accounts that require further actions or approvals. This may, for example, include a visual 'pending' status and an explanation to describe what the status means. This standard would apply to joint accounts and any other account type where the provision is appropriate.

The proposed standard would be articulated as follows:

Where an account requires further actions or approvals before data can be disclosed, DHs **MUST** indicate this to the user visually and provide an explanation of what is required or expected.

This **MAY**, for example, be achieved with a visual icon to indicate that the account is 'pending'. This indication **MUST** be accompanied by an in-context explanation to describe what the status means. This explanation **SHOULD** include required actions and any specified time frames.

Ceasing Joint Account Data Sharing

Rule 4A.13(1)(d) states that, 'as part of the withdrawal process' for joint account sharing approval, a message 'relating to the consequences of the withdrawal' must be displayed in accordance with the data standards.

Consumer research suggests that the difference between removing an approval and changing to a non-disclosure option is not easily understood in isolation. To support informed joint account management and to help consumers choose their intended action, this section proposes specific elements to include in the withdrawal messaging.

This option would apply to DHs advising the relevant joint account holder of the consequences of withdrawing the joint account(s) from a specific authorisation or changing joint account(s) to a non-disclosure option.

For design concepts illustrating option 2, see [Miro](#) | [PDF](#)

Option 1: No Change

No standards will be proposed. This option may result in unintended and inconsistent joint account management outcomes within and across data holders. This option is not recommended.

Option 2: Joint Account Withdrawal Standards

This option proposes specific withdrawal message elements to include when removing an approval or changing to a non-disclosure option.

The proposed standards would be as follows:

As part of the process of removing a joint account approval or changing to a non-disclosure option, DHs MUST advise the consumer:

1. that doing this may impact existing services
2. to check with the other account holder(s) before continuing
3. when removing an approval:
 - a. that even though sharing for this service has now stopped, the other account holder(s) can still share data from the joint account
 - b. how to change their disclosure option

Current Recommendation

The below options are proposed to apply by 1 July 2022 as per the rules on joint account compliance. A summarised version of the supported options is listed below for ease of reference.

Joint Account Notifications

Option 2: Notification Frequency

DHs **SHOULD** offer consumers the ability to receive their joint account notifications as a periodic summary.

Option 3: Granular Control

DHs **SHOULD** offer consumers the ability to specify which joint account notifications they do and do not want to receive.

Option 5: Consequences of Amendment

DHs **MUST** notify the consumer of the consequences of amending their joint account notification schedule. This information **MUST** also include instructions for how to amend this schedule or reverse the amendment.

Option 6: Means to Amend Notifications – Contextual

DHs **MUST** provide a mechanism or entry point for a notification schedule to be amended from or in relation to the notification itself.

Option 7: Means to Amend Notifications – Channels

DHs **SHOULD** allow a consumer to amend their notification schedule in line with existing notification management channels and experiences.

Option 8: Notification Content – Review Authorisation

DHs **MUST** provide a link to or instruction for how the authorisation can be reviewed from or in relation to the notification itself.

Notification Alerts

Option 2: Contextual Alert

DHs **MUST** alert a joint account holder where an action they are about to perform may result in the other joint account holder(s) being notified.

Vulnerable Joint Account Holders

Option 2: Authorisation Alert

Where rule 4A.15 is leveraged to allow a vulnerable requester to share their joint account data as if it were an individual account, the DH **MUST** alert the requester that the other joint account holder(s) will not be notified.

Pending Disclosures

Option 2: Pending Status Provisions

Where an account requires further actions or approvals before data can be disclosed, DHs **MUST** indicate this to the user visually and provide an explanation of what is required or expected.

Ceasing Joint Account Data Sharing

Option 2: Joint Account Withdrawal Standards

DHs **MUST** provide specific withdrawal message elements to include when removing an approval or changing to a non-disclosure option.

Implementation Considerations

Joint account implementations are currently live for a small number of DHs, with the remaining ADIs required to implement joint accounts by July 2022. The v3 rules introduced new requirements for notifications that will impact existing and planned implementations. The proposals in this paper provide detail and parameters relating to the resultant build.

The options with a MUST obligation largely relate to static and generic content and pathways. Options with a SHOULD obligation provide clear recommended alternatives that DHs can adopt but are not required to implement if valid reasons exist. Based on consultation and NP207, no technical data standards have been identified as necessary to support the CX standards in this paper.

As noted in the beginning of this paper, the community has requested a 6-month lead time for standards implementation. The DSB is working to honour this request and provide additional time for joint accounts.

When reviewing this proposal and formulating feedback, please consider the following questions:

1. Which options and obligation levels are supported?
2. If no options are supported, what alternatives exist to address the identified issues?
3. Are there additional standards that should be considered?
4. To support guidance on informed joint account management, how can the following be described to consumers in a comprehensible and meaningful way:
 - a. Disclosure option management service
 - b. Disclosure option(s)
 - c. Pre-approval
 - d. Co-approval
 - e. Approvals and removing an approval
2. Where could CX Guidelines be developed to assist joint account implementation?