

	Questions	Feedback
1.	Which options and obligation levels are supported?	<p>Notification Options : <u>CBA supports Option 1 – No Change</u> Data Holders have different means of managing notifications and should have the flexibility to build what they believe provides the best experience and most clarity for their customers. CBA is of the view that creating a new granular notification system specific to Open Banking may unintentionally impact a Data holder’s online banking notification platform resulting in significant build implications and potentially changing the way in which that data holder’s customers generally expect to receive notifications.</p> <p>CBA supports the view that any new notification standards are “SHOULD” requirements rather than “MUST”, which will provide more flexibility for enabling.</p> <p>Notification Alerts : <u>CBA supports Option 2 – Contextual Alert.</u> CBA supports alerting a joint account holder when an action they are about to perform may result in the other joint account holder being notified. This would also help protect vulnerable customers by maintaining transparency especially in light of the default pre-approval to share joint account data.</p> <p>Vulnerable Joint Account Holders : <u>CBA supports Option 2 – Authorisation Alert</u> CBA understands that this Standard is reliant on instances when Rule 4A.15 is leveraged to protect a vulnerable customer. In these instances, re-assuring a joint account holder that other joint account holders will not be notified will help mitigate risks and concerns with data sharing for such customer types.</p> <p>Pending Disclosures: <u>CBA supports Option 2 – Pending status provision</u> CBA supports the introduction of standards that would enable DH’s to provide more in-context explanation to customers. This standard helps customers understand why their data may not be disclosed at the same time as their authorisation and helps clarify any confusions with regards to the delayed disclosure.</p> <p>Ceasing Joint account Data Sharing : <u>CBA supports Option 2</u> CBA values the importance of providing clarity to consumers and therefore Supports option 2 (specifically the elements 1, 2 and 3b of proposed Standard). Option 2 would enable consumers to make an informed decision before they either revoke consent or make changes to their disclosure option.</p> <p>However, CBA believes that this Standard would be most beneficial if phrased as “SHOULD” as opposed to “MUST”, which will enable data holders greater flexibility on the specific language used to meet this requirement.</p> <p>CBA seeks clarity regarding element 3a of the standard. CBA is concerned that it may cause confusion for consumers.</p>
2.	If no options are supported, what alternatives exist to address the identified issues?	NA
3.	Are there additional standards that should be considered?	NA
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	<p>CBA supports the use of clear, consumer-friendly language to avoid overwhelming or confusing consumers</p> <p>CBA is of the view that no particular term/s should be mandated (e.g. Disclosure option management service; pre-approval; or co-approval) as part of the data standards. Data Holder should be given the flexibility and time to work through the customer journey and identify the appropriate terms or phrases that best describe the process in a meaningful and simple manner in the context of the banking environment.</p>
5.	Where CX Guidelines could be developed to assist joint account implementation?	CBA recommends that additional CX guidelines and examples are developed to assist data holders with better understanding the requirements more clearly.

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