Data Standards Body Consumer Experience Working Group Decision Proposal <u>162</u>: Joint Accounts

Contact: Michael Palmyre Publish Date: 8 December 2021 Decision Approved by Data Standards Chair: 10 December 2021

Context

This decision relates to Consumer Experience (CX) Standards for joint accounts. Consultation on these standards occurred in <u>DP162</u>, which concluded on 30 November 2021.

This paper seeks to define CX standards to support intuitive, safe, and informed joint account sharing and management. The rules refer to data standards in the following areas that are relevant to this decision:

- 4A.6(8), which states that the Disclosure Option Management Service (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 dashboards in general
- Division 4.4, which relates to authorisations to disclose CDR data

Data standards are being proposed for several areas, including:

- Joint account notifications
- Notification alerts
- <u>Vulnerable joint account holders</u>
- Pending disclosures
- <u>Ceasing joint account data sharing</u>

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

- DP162 consultation
- Noting Paper 207 consultation
- Noting Paper 157 consultation
- Draft v3 Rules consultation
- Design Paper: <u>an opt-out data sharing model</u>
- Public joint accounts workshop in March 2021. See public workshop Miro Board
- Phase 3 CX research Rounds 1, 2, 3 and, 6
- Consumer Policy Research Centre (CPRC) report: Joint accounts & the Consumer Data Right

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 rules also support joint accounts with more than 2 account holders.

Decision to be Made

- 1. Decide joint account notification standards
- 2. Decide standards for intuitive and informed joint account sharing and management
- 3. Decide obligation dates for the relevant standards

Decision for Approval

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Rule 4A.14 explains that JAH-B must receive notifications when JAH-A (the requester) has given, amended, or withdrawn an authorisation, or that authorisation has expired.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

The rules state that data holders **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

This section outlines optional standards that data holders may implement to support these outcomes. For design concepts of the standards in this section see <u>Miro</u> | <u>PDF</u>

The rules **require** data holders to provide an alternative notification schedule, including reducing the frequency of joint account notifications or not receiving joint account notifications.

The following standards will be added to a new 'Notifications' section:

Notifications: Alternative Notification Schedules for Joint Accounts

Rule 4A.14(3) requires data holders to (a) provide for alternative notification schedules (including reducing the frequency of notifications or not receiving notifications) and (b) give each joint account holder a means of selecting such an alternative, and of changing an election.

Alternative settings under 4A.14(3) only apply to the following notifications in 4A.14(1):

- 1. The requester has given, amended, or withdrawn an authorisation
- 2. Expiration of an authorisation
- 3. A relevant account holder hasn't given approval within the relevant time frame
- 4. A relevant account holder has withdrawn an approval

The standards in this section provide a non-exhaustive list of options that data holders may implement to support their compliance with these rules. The specific implementation of an alternative notification schedule and offering, which may or may not include options listed here, are at the data holder's discretion. It is the data holder's responsibility to ensure it is meeting its obligations under the CDR Rules. Compliance with the CDR Rules on alternative notification schedules would require, at a minimum, implementation of a combination of options (being a combination of options listed below, other measures, or both).

Area	CV Standard
Area	CX Standard
Joint account notifications: Reduced	Data holders MAY offer consumers the ability to
frequency	receive their joint account notifications less
	frequently and as a periodic summary.
	This MAY , for example, outline all joint account
	activity at a frequency determined by the data
	holder and consumer, such as the previous
	quarter, month, fortnight, and so on.
	This MAY also, for example, be provided with or
	in relation to other CDR notifications such as a
	CDR Receipt, which is optional for data holders.
Joint account notifications: Granular	Data holders MAY offer consumers the ability to
control	specify which joint account notifications they do
	and do not want to receive.
	This BOOM for example, ellow a relevant isint
	This MAY , for example, allow a relevant joint
	account holder to only receive notifications
	when the requester gives or amends an
	authorisation.

Joint account notifications: Turn off notifications	Data holders MAY allow consumers to elect to no longer receive any joint account notifications.
Joint account notifications: Consequences of amendment	Data holders MAY inform the consumer of the consequences of amending their joint account notification schedule.
	This notification MAY include instructions for how to amend this schedule or reverse the amendment.
Joint account notifications: Contextual amendment	Data holders MAY provide a mechanism or entry point for a notification schedule to be amended from or in relation to the notification itself.
	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, include a link to amend the notification schedule or instructions to direct the consumer to the appropriate place.
Joint account notifications: Amendment channels	Data holders MAY 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.
Joint account notifications: Notification content	For the content of the approval notification, data holders MAY provide the consumer with instructions for how any relevant authorisation(s) or approval(s) can be reviewed.

Notification Alerts

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 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 of the standard for this issue, see Miro | PDF

This section also tends to the scenario where a data holder has leveraged rule 4A.15 and deemed 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 data holder can treat a joint account like an individual account so that equivalent dashboard requirements and joint account notifications do not apply. This section proposes that such joint account exemptions be made apparent to the vulnerable joint account holder.

For design concepts of the standard for this issue, see Miro | PDF

The following standards will be added to a new 'Notifications' section:

Notifications: Joint Account Alerts

The standards in this section apply where a relevant joint account holder is about to take an action that **may** or, where a data holder leverages rule 4A.15 and allows a vulnerable joint account holder to share joint account data as if it were from an individual account, **may not** result in the other joint account holder(s) being notified.

Area	CX Standard
Joint account notifications: Contextual alert	Data holders 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 data holder.

Joint account notifications: Rule 4A.15	Where rule 4A.15 is leveraged to allow a
exemptions	vulnerable requester to share their joint account
	data as if it were an individual account, the data
	holder MUST alert the requester, in the context
	of the authorisation flow, that the other joint
	account holder(s) will not be notified.
	account noider (s) will not be notified.
	This alert SHOULD be applied where
	appropriate for joint account management in
	general, including the consumer dashboard and
	the Disclosure Option Management Service
	(DOMS).
Joint account notifications: Further	In relation to the joint account alert standards in
information	this section, data holders MAY provide further
	information about any services or processes in
	place for supporting vulnerable consumers or
	reporting risks of physical, psychological, or
	financial harm or abuse to the data holder.

Pending Disclosures

If a data holder 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 may apply to other scenarios, such as non-individual accounts, partnerships, and secondary user sharing.

This section contains a proposal for a data standard to allow data holders to indicate, in the authorisation flow, that an account is 'pending' further actions or approvals and include explanatory information about what this means. This standard would apply to joint accounts and any other account type where the provision is appropriate.

For design concepts illustrating this standard, see Miro | PDF

Area	CX Standard
Authorisation: Pending status	 Where an account requires further actions or approvals before data can be disclosed, data holders MUST indicate this to the user visually and MUST 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 any required actions and any specified time frames.

The following standard will be added to the existing '<u>Authorisation Standards</u>' section:

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.

To support informed joint account management and to help consumers choose their intended action, this section proposes specific elements to include in withdrawal messaging.

This standard would apply to data holders advising the relevant joint account holder of the consequences of withdrawing the joint account(s) from a specific authorisation or changing sharing for their joint account(s) to a more restrictive disclosure option.

For design concepts illustrating this standard, see Miro | PDF

The following standard will be added to the existing '<u>Withdrawal Standards</u>' section:

Area	CX Standard
Withdrawal: Joint accounts	 As part of the process of removing a joint account approval or changing to a more restrictive disclosure option, the data holder MUST advise the consumer: 1. that doing this may impact existing services, including arrangements initiated by the other account holder(s) 2. when removing an approval: a. that even though sharing for this service has now stopped, the other account holder(s) can still create new data sharing arrangements for the joint account
	 b. how to change their disclosure option Note: The exact phrasing of the withdrawal message is at the discretion of the data holder. This standard does not affect data holders' other patification obligations, including under
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Obligation Dates

Data holders will need to comply with these standards from **1 July 2022** as per the rules on joint account compliance and phasing.

This following will be outlined in the <u>Future Dated Obligations</u> section of the standards as follows:

Data holders **MUST** implement the following data standards from 1 July 2022:

- Notifications: Alternative notification schedules for joint accounts
- Notifications: Joint account alerts
- Authorisation: Pending status
- Withdrawal: Joint accounts

Implementation Considerations

The DP162 consultation suggested broad support for the proposed obligation date and options except for certain alternative notification schedule standards, which may conflict with existing notification experiences provided by data holders. These alternative notification standards have been revised to be optional (a 'MAY') and are proposed as a non-exhaustive list of alternatives that data holders may implement.

The specific implementation of an alternative notification schedule and offering, which may or may not include the optional standards, are at the data holder's discretion. Compliance with the CDR Rules on alternative notification schedules would require, at a minimum, implementation of a combination of options (being a combination of options listed in this paper, other measures, or both).

Joint account implementations are currently live for a small number of data holders, with the remaining ADIs required to implement joint accounts by July 2022. The rules introduced new requirements for notifications that will impact existing and planned implementations. The standards 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** or **MAY** obligation provide clear recommended alternatives that data holders can adopt but are not required to implement. No technical data standards have been identified as necessary to support the CX standards in this paper.