

Consumer Data Right newsletter: 17 May 2021

Dear <<First Name>>,

This week's Consumer Data Right (CDR) newsletter includes:

- what the 2021-22 Federal Budget contained on CDR
- ACCC compliance guidance for data holders in the banking sector
- ACCC guidance on authorised deposit-taking institution (ADI) responsibility for data holder brands
- a reminder about the consultation open on CDR rules and standards design papers, and information about deferral of joint account and direct to consumer obligations.

Federal Budget 2021-2022

As part of the [Budget papers](#) released on 11 May 2021, the Government stated its continued commitment to implementing the CDR in the banking sector and accelerating its rollout across the economy, including in the energy and telecommunications sectors. Treasury is excited for the next phase of the CDR rollout, where we will see:

- the development of a data-driven economy
- increased innovation in a post-COVID economic environment
- consumers empowered to make informed choices about their services, and
- reduced costs for Australian households and small businesses.

As noted in our [7 May 2021 newsletter](#), the Government's 2021-22 Federal Budget includes \$111.3 million of investment to both continue and expand CDR rollout.

ACCC compliance guide for data holders in the banking sector

The ACCC has published [compliance guidance for data holders](#) in the banking sector. This guide is designed to assist data holders to understand and comply with their obligations under the Consumer Data Right Rules and Standards.

ACCC guidance on ADI responsibility for data holder brands

The ACCC has published some guidance on [ADI responsibility for data holder brands](#). This document is designed to assist industry participants identify whether they have data holder obligations in relation to particular brands or branded products they are associated with.

Reminder: Consumer Data Right rules and standards design papers

As announced in our [30 April newsletter](#), Treasury and the Data Standards Body are seeking input on design issues to inform the development of rules and standards to implement:

- a peer-to-peer data access model in the energy sector, and
- an ‘opt-out’ data-sharing model for joint accounts in the banking and energy sectors.

To support consultation and elicit informal feedback on these issues, two design papers are now available on [Treasury’s website](#) for stakeholders’ consideration.

We welcome feedback and engagement on an informal basis, which can be provided through GitHub (with separate pages for [joint accounts](#) and [peer-to-peer model for energy](#) feedback) or by emailing DATA@treasury.gov.au.

As part of the consultation discussions, there have been a number of queries about the deferral of the joint account requirements and ‘direct to consumer’ obligations that would have applied from November 2021 ([Treasury announcement](#)). Treasury has responded to these queries with additional information which is available on the [CDR Support Portal](#).

We are seeking stakeholder views by **26 May** on the details of rules and standards outlined in these papers.

Feedback received on these papers will inform the development of draft rules and standards, which will be the subject of formal consultation in the coming months.

Kind regards,

Kate O’Rourke
First Assistant Secretary

Consumer Data Right Division
The Treasury

Response to queries: Deferral of joint account and direct to consumer obligations

On 30 April 2021 the Treasury [announced](#) that the current requirements for banks to implement the joint account requirements that would have applied from November 2021 will be deferred, with new compliance dates to be set following [consultation on the joint account data sharing model](#).

Separately, compliance with data holders' 'direct to consumer' obligations that would have applied from November 2021 will also be deferred, pending a future consultation process.

In response to this announcement, Treasury has been asked for more details on the deferral announcement and its implications for data holders in the banking sector.

What are the joint account obligations that are being deferred?

Major ADIs

Major ADIs must continue to facilitate joint account data sharing in accordance with the obligations in [version 1](#) of the CDR Rules.

Under the deferral major ADIs will not be required to comply with the additional obligations in [version 2](#) of the CDR Rules that would have applied from November 2021. The key differences between version 1 and version 2 of the joint account data sharing obligations in the CDR Rules are described in a [CDR Support Portal article](#). In particular, major ADIs must continue to support joint account data sharing for joint accounts with two account holders, maintain a joint account management service to allow consumers to manage their disclosure options, as well as meet the dashboard and notification requirements under version 1. However, the following obligations in version 2 will be deferred:

- requirements for sharing data on joint accounts where there are more than two account holders (rather than two account holders only)
- notification and invitation requirements
- the 'in-flow election' processes
- secondary user functionality for joint accounts.

Non-major ADIs

Obligations for non-major ADIs to share joint account data from November 2021 will be deferred. This will also apply to the major banks for their non-primary brands.

Reciprocal data holders

Similarly, current requirements for reciprocal data holders to share joint account data under version 1 of the CDR Rules from July 2021, and version 2 of the CDR Rules from November 2021, will be deferred.

The deferral does not affect other obligations for the non-major ADIs that are due to commence from November 2021, in relation to phase 2 products and additional APIs. For example, this means that non-major ADIs will be required to respond to consumer data requests for phase 2 products

from November 2021 where these products are held by single account holders (including home loans, mortgage offset accounts and personal loans).

	Requirements under the current rules			Effect of deferral
	Present	Jul 2021	Nov 2021	
Major ADIs	Share joint account data under version 1 of the rules until 31 October 2021		Share joint account data under version 2 of the rules	Must continue sharing joint account data under version 1 of the rules No requirement to implement additional joint account functionality that would have applied from November 2021
Non-major ADIs and non-primary brands of major ADIs			Share joint account data under version 2 of the rules	
Reciprocal data holders		Share joint account data under version 1 of the rules until 31 October 2021	Share joint account data under version 2 of the rules	No requirement to share joint account data

What is the new compliance date for joint account obligations?

New compliance dates for joint account obligations will be determined by the Minister after considering feedback from stakeholders received during the current consultation on the joint account design paper, and from the formal consultation that will occur on draft amendments to the CDR Rules. New compliance dates will be determined, even if the Minister decides, following consultation, to maintain the current approach to joint account data sharing in the CDR Rules.

How can I provide feedback on the new compliance date for joint account obligations?

Feedback on the issues outlined in the joint account [design paper](#) can be provided up until **26 May 2021**, including on the implementation considerations to inform a new compliance date for joint account data sharing. Draft rules will be developed for formal consultation as soon as possible following the close of consultation on the design paper.

As noted in the design paper, we are keen to ensure that joint account data sharing can commence as quickly as possible and for as many consumers as possible, and to support increased participation in the CDR by prospective ADRs. While the design paper notes the desire for any new compliance

date to be in Q1 of 2022, this is a consultation issue and we encourage feedback on the implementation timeframes that would be achievable for the options explored in the paper. We encourage the provision of specific information about the implementation impacts of the opt-out proposal to support submissions on the new compliance date.

What are ‘direct to consumer’ obligations that are being deferred?

All data holder requirements to disclose required consumer data in response to a direct request made by a CDR consumer (the ‘direct to consumer’ obligations) will be deferred. The intention is for consultation to occur at a future time on an API-based model for direct to consumer obligations and part of that process would involve consideration of compliance dates for these obligations.

How will the deferrals be given effect?

Deferrals relating to joint account and ‘direct to consumer’ obligations will be given effect through amendments to commencement provisions in the CDR Rules. The process for consulting on and finalising these rules is intended to occur prior to November 2021.

Consumer Data Right Board

Meeting Details

Date: 18 May 2021
Time: 9:00 – 10:30am
Locations: Canberra – Sir Roland Wilson Room (Level 5)
 Multi - Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Sarah Court	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Adviser	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Adviser	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Secretariat	s 22	Analyst, Treasury
	s 22	Director, Treasury

AGENDA

Item	Verbal / Paper	Responsibility
s 22		
1.5	Action Items	Paper Ms Quinn
s 22		

Consumer Data Right Board

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Action item CDRB/201020/2.5 (Direct to consumer, assigned to Treasury) remains open.			
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The remainder of this document is outside the scope of the request and has been deleted

20 April 2021 CDR Board - Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement "direct to consumer" to ensure that it addresses privacy issues appropriately.	Treasury	Early 2021 (possibly out of session)	Update provided at the 20 April 2021 meeting at agenda item CDRB/210420/2.1. Rules for Direct to consumer functions will not be included in Rules 3.0, however will be considered for a subsequent version of the rules.

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Consumer Data Right Board

Meeting Details

Date: 15 June 2021
Time: 9:00 – 10:30am
Locations: Canberra – Sir Roland Wilson Room (Level 5)
 Multi - Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Elizabeth Hampton for Angelene Falk	Australian Information Commissioner
Member	Natalie Horvatt Shelby Schofield	Department of Minister and Cabinet (Items 3.2 and 3.3) Department of Minister and Cabinet (Items 3.2 and 3.3)
Member	Shannon Frazer (for Nathan Williamson)	Department of Finance (Items 3.2 and 3.3)
Member	Jonathon Thorpe	Digital Transformation Agency (Items 3.1, 3.2 and 3.3)
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC
Observer	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Observer	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Observer	s 22	Director, ACCC
Secretariat	s 22	Analyst, Treasury
	s 22	Director, Treasury

AGENDA

Item	Verbal / Paper	Responsibility
s 22		

Consumer Data Right Board

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1.5	Action Items	Paper	Ms Quinn	
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The following action items remain open:

- CDRB/201020/2.5 (Direct to consumer, assigned to Treasury).

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The remainder of this document is outside the scope of the request and has been deleted

18 May 2021 CDR Board - Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement "direct to consumer" to ensure that it addresses privacy issues appropriately.	Treasury	Early 2021 (possibly out of session)	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

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Deferral of direct to consumer obligations

- The rules currently contain a requirement, that would apply from 1 November 2021, on data holders to transfer data directly to consumers on request in a ‘human-readable form’ in accordance with the data standards. Significant concerns were raised about the utility and cost to provide data in human-readable form during consultation on a draft standard during late 2019.
- On 16 April you agreed to defer data holder ‘direct to consumer’ obligations indefinitely, pending a future consultation process to review the appropriate model for providing direct access to data by consumers. This decision was announced on 30 April on the Treasury website.

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The remainder of this document is outside the scope of the request and has been deleted

Consumer Data Right Board

Meeting Details

Date: 20 July 2021
Time: 9:00 – 10:30am
Locations: Canberra – Executive Dining Room (Level 5)
 Multi – Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC
Observer	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Observer	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Observer	s 22	Director, ACCC
Secretariat	s 22	Director, Treasury
Secretariat	s 22	Program Officer, Treasury

AGENDA

Item	Verbal / Paper	Responsibility
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1.5	Action Items	Paper	Ms Quinn
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Consumer Data Right Board

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The following action items remain open:

- CDRB/201020/2.5 (Direct to consumer, assigned to Treasury).

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The remainder of this document is outside the scope of the request and has been deleted

15 June 2021 CDR Board - Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement "direct to consumer" to ensure that it addresses privacy issues appropriately.	Treasury	Early 2021 (possibly out of session)	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

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‘Direct to consumer’ obligations

Background on position on ‘direct to consumer’ obligations in the banking sector

- On 16 April (MS21-000864 refers) the Minister agreed to defer data holder ‘direct to consumer’ obligations indefinitely for the banking sector, pending a future consultation process to review the appropriate model for providing direct access to data by consumers. These obligations would have required banking data holders to offer this service to consumers on request in a ‘human-readable form’ in a matter prescribed by the data standards, with effect from 1 November 2021. The deferral was announced on 30 April on the Treasury website.

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- The exposure draft rules do not apply ‘direct to consumer’ obligations for energy data holders at this time. Treasury considers that any consultation on the future application of these obligations should explicitly address the overlap with existing energy regulation, and any consultation should first occur with State, Territory and Commonwealth Energy Ministers.

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From: s 22
To: s 47F
Cc: s 22, s 22, s 22, s 22
Subject: Questions from last week's CDR rules v3 presentation [SEC=OFFICIAL]
Date: Wednesday, 28 July 2021 2:52:00 PM
Attachments: [image001.gif](#)

OFFICIAL

Hi s 47F

Thanks for attending the presentation on the CDR Rules consultation at the implementation call last Thursday. I hope you found it useful.

We wanted to follow up on your questions to close off on that call:

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Direct to consumer under v3 seems to be deferred, is there any date in mind for when this will be introduced?

There is not currently a date in mind for the direct to consumer obligations. As noted on the [CDR Support Portal](#), the intention is for consultation to occur at a future time on an API-based model for direct to consumer obligations and part of that process would involve consideration of compliance dates for these obligations.

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Kind regards

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Director (a/g) Rules Unit
Consumer Data Right Division | Markets Group | The Treasury
Level 16, 530 Collins Street, Melbourne

Ph: s 22 | **M:** s 22 | **E:** s 22

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The Treasury acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures and to elders both past and present.

OFFICIAL

Data Standards Body

Consumer Experience and Technical Working Groups

Noting Paper 207: Draft v3 Rules Analysis | Anticipated Data Standards

Contact: Michael Palmyre and Mark Verstege

Publish Date: 9 August 2021

Feedback Conclusion Date: 24 August 2021

Context

A [draft version 3 of the Consumer Data Right \(CDR\) Rules](#) (draft v3 rules) was published for consultation from 1 July – 30 July 2021. This [Noting Paper](#) considers potential data standards changes using the draft v3 rules as reference.

The purpose of this Noting Paper is to consult on the scope and intent of the anticipated data standards changes by reference to the draft v3 rules that were published for consultation.

This paper includes anticipated changes to the [Consumer Data Standards](#) relating to Consumer Experience, Information Security, Technical API Standards and the [CDR Register](#) to support alignment with the proposed [draft v3 rules](#).

The major areas include:

1. [Sponsored Accreditation](#)
2. [The CDR Representative Model](#)
3. [Unaccredited OSPs](#)
4. [Trusted Advisers](#)
5. [CDR Insights](#)
6. [Joint Accounts](#)
7. [Direct to Consumer](#)
8. [ADR Representation](#)

Targeted decision proposal consultations will occur separately to this Noting Paper for the specific areas listed in this document, in light of the final rules made by the Minister. The DSB invites the community to provide feedback on timings, content, and obligations.

The draft v3 rules published for consultation are subject to change. If, or where, the rules change from the draft version 3 of the CDR Rules, impacts to anticipated changes will be addressed as part of ongoing consultation. Standards not currently authorised in the rules cannot be made. As such, the creation of v3 rules-dependent standards will necessarily follow the making of the final rules.

Decision To Be Made

Decide the scope and intent of the changes to the Data Standards based on the draft v3 rules. While a [Noting Paper](#) is not part of a formal decision proposal consultation, the DSB strongly encourages feedback to help inform data standards development in relation to these key items.

Identified Options

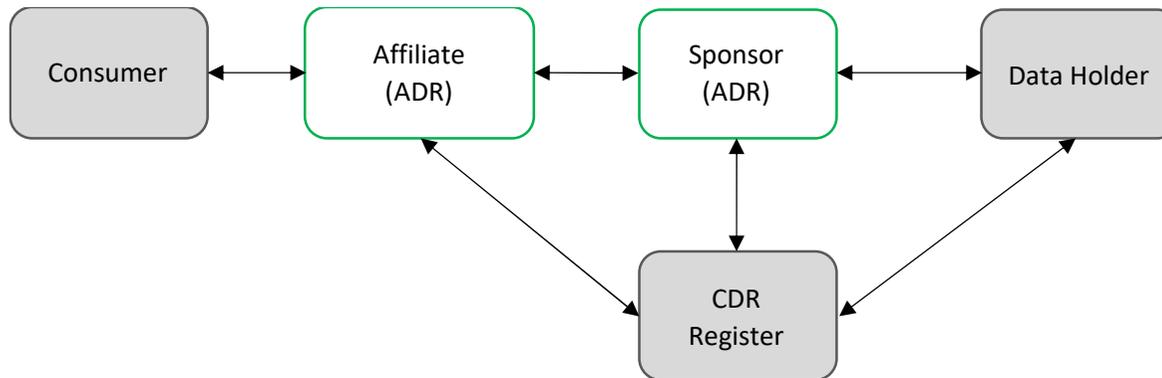
This Noting Paper contains a brief description of the anticipated standards changes in relation to specific topics. Each change discussed in this paper will be consulted on separately, where necessary, but CDR participants should use this consultation to raise any concerns or impacts. Suggestions for alternatives for any topics are welcome and should be raised in the consultation process.

The structure of this section aligns with the headings in the draft v3 rules explanatory materials.

Each section contains a table with descriptions of the expected obligations and timing for Accredited Data Recipients (ADR, also referred to as Accredited Persons) and Data Holders (DH).

Sponsored Accreditation

The sponsored level of accreditation is for persons with or who intend to have an arrangement with an unrestricted accredited person who is willing to act as their sponsor in the CDR regime. A person accredited to the sponsored level and in a sponsorship arrangement would be known as an affiliate of its sponsor. An affiliate is an accredited person and is required to fulfil the obligations of an accredited person in the CDR regime.



Further analysis and consultation needs to be conducted to understand if/how an affiliate may appear to the consumer throughout the consent model, particularly in the DH's authorisation flow and authorisation management dashboard.

Table 1. Sponsored Accreditation

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
1.	ADR representation in DH authorisation flow and dashboards	ADR DH	1.14(3)(ha) 1.15(ba) and (bb) 4.23(2)	ADR: MAY DH: MUST	<p>The DSB will consult on additional consent-related fields to determine if or how these fields could support more complex accreditation models. Additional details on this proposal can be found in the Table 8. ADR Representation issue.</p> <p>Further analysis will need to be conducted to understand how affiliates will or will not surface in DH authorisation flows and dashboards.</p> <p>This issue is reflected in: Table 2. CDR Representative Model Table 8. ADR Representation</p> <p>Purpose: Achieve comprehensible and contextually appropriate presentation of ADRs during authentication, authorisation, and on consumer dashboards.</p>	TBD	TBD
2.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX Data Standards are anticipated for this item.	N/A	N/A
3.	Consumer Data Standards (Technical)	N/A	N/A	N/A	<p>No technical standards are currently anticipated for this specific item.</p> <p>However, the outcome of the ADR representation issue may require technical standards. This will be consulted on in a separate consultation.</p> <p>The rules allow for the transfer of CDR data between ADRs as long as appropriate consent is obtained. While the rules define obligations that ADRs must meet in order to make</p>	N/A	N/A

Table 1. Sponsored Accreditation

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					these transfers there is no requirement for the DSB to make standards for this transfer. The DSB has not sought to impose technical standards on the transfer of data between accredited persons.		
4.	CDR Register Standards (Technical)	N/A	N/A	N/A	<p>No technical standards are currently anticipated for this specific item.</p> <p>However, the outcome of the ADR representation issue may require technical standards. This will be consulted on in a separate consultation.</p> <p>The CDR Register APIs are designed for trusted information sharing between Accredited Data Recipients and Data Holders. Affiliates collect CDR data through a sponsor rather than directly connecting to Data holders. Since the sponsor is themselves an existing ADR, the CDR Register APIs contain the necessary metadata to facilitate the trusted connection of the sponsor to the Data Holder.</p>	N/A	N/A
5.	CDR Register (Participant Portal)	ADR	N/A	N/A	<p>The rule changes associated with the introduction of Sponsored Accreditation and Sponsorship arrangements will require additional functions to be added to the CDR Participant Portal and additional accreditation onboarding requirements. These functions will enable:</p> <ul style="list-style-type: none"> • Prospective accredited persons to: <ul style="list-style-type: none"> ○ Apply for accreditation and be assessed against the criteria at the sponsored level • Unrestricted accredited data recipients to: 	TBD	TBD

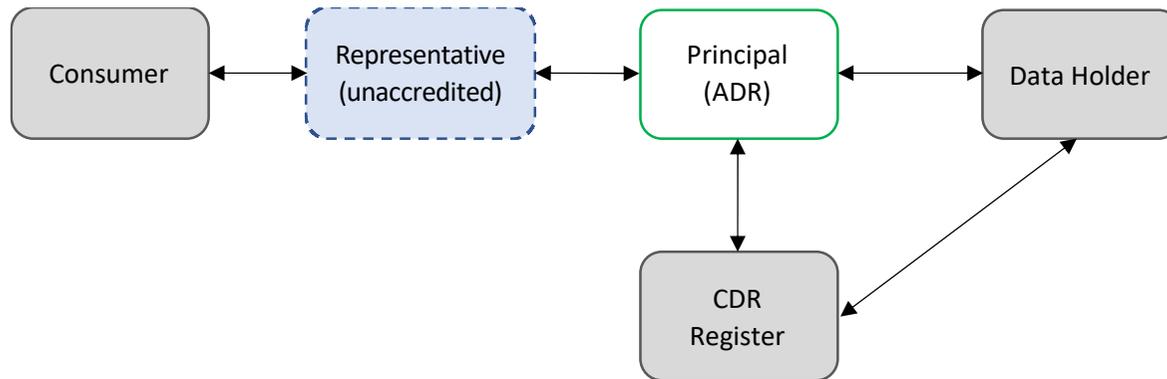
Table 1. Sponsored Accreditation

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					<ul style="list-style-type: none"> ○ Notify the Data Recipient Accreditor when a sponsorship arrangement has been established; ○ Manage the status of these arrangements by providing updated information as needed. <p>Sponsored accredited persons will appear on the find-a-provider page. Where sponsorship arrangements exist, details of the relationships between sponsors and affiliates will be available.</p>		

The CDR Representative Model

The CDR representative model enables unaccredited persons to provide goods and services to consumers using CDR data in circumstances where they are in a CDR representative arrangement with an unrestricted accredited person who is liable for them.

An unaccredited person who is in a CDR representative arrangement would be known as the CDR representative of the principal accredited person.



#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
6.	ADR representation in DH authorisation flow and dashboards	ADR DH	1.14(3)(ha) 1.15(ba) and (bb) 4.23(2)	ADR: MAY DH: MUST	The DSB will consult on additional consent-related fields to determine if or how these fields could support more complex accreditation models. Additional details on this proposal can be found in the Table 8. ADR Representation issue . Further analysis will need to be conducted to understand how CDR Representatives will or will not surface in DH authorisation flows and dashboards. This issue is reflected in:	TBD	TBD

<i>Table 2. CDR Representative Model</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					Table 1. Sponsored Accreditation Table 8. ADR Representation Purpose: Achieve comprehensible and contextually appropriate presentation of ADRs during authentication, authorisation, and on consumer dashboards.		
7.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX Data Standards are anticipated for this item.	N/A	N/A
8.	Consumer Data Standards (Technical)	N/A	N/A	N/A	No technical standards are currently anticipated for this specific item. However, the outcome of the ADR representation issue may require technical standards. This will be consulted on in a separate consultation. The rules allow for the transfer of CDR data between ADRs as long as appropriate consent is obtained. While the rules define obligations that ADRs must meet in order to make these transfers there is no requirement for the DSB to make standards for this transfer. The DSB has not sought to impose technical standards on the transfer of data between accredited persons.	N/A	N/A
9.	CDR Register Standards (Technical)	N/A	N/A	N/A	No technical standards are currently anticipated for this specific item. A principal may enter into many arrangements with separate CDR representatives (representatives). In this situation, the representatives provide goods or services to consumers, at least in part, using CDR data. It is possible that a principal may represent:	N/A	N/A

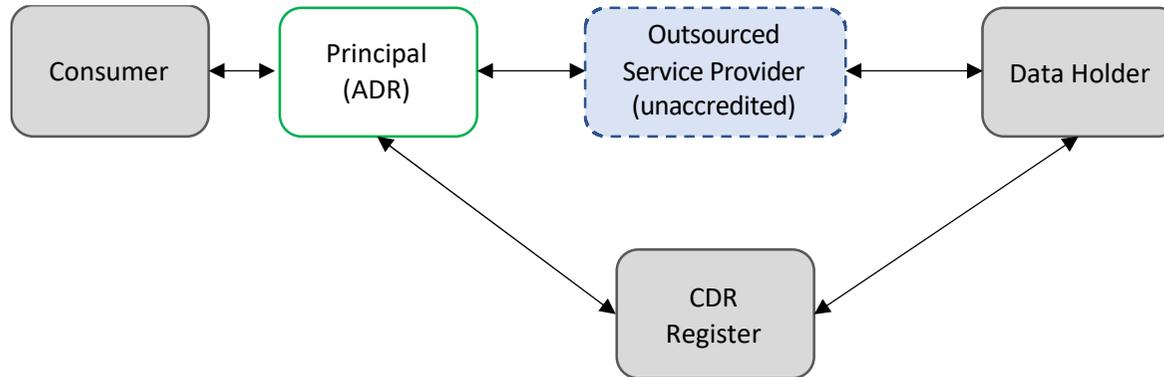
Table 2. CDR Representative Model

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					<p>(a) these arrangements under a common brand and software product of the principal, or</p> <p>(b) each arrangement under separate software products and/ or data recipient brands.</p> <p>The CDR Register GetDataRecipients API supports the disclosure of the representative arrangement using existing metadata where the accredited persons that have entered into the representative arrangement make it known to the consumer. This can be achieved in one of two ways:</p> <p>(a) The brand of the principal would be used in a brandName of the data recipient. The software product of the principal would be used in the softwareProductName of the data recipient. The software product would be onboarded by the principal. An example may include an online accounting platform that provides its own marketplace of vendors that offer additional goods and services. The brand and software product presented during the consent flow would be the brand and software product of the accounting platform. The consumer would see consent arrangements in their data holder dashboard under the brand and software product of the accounting platform.</p> <p>(b) The brand of the representative may be used in the brandName of the data recipient. The software product of the representative would be used in the softwareProductName. The software product may be on-boarded for the representative by the principal operating under the representative</p>		

<i>Table 2. CDR Representative Model</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					<p>arrangement. An example may include a large mortgage broker utilising a bank's common mortgage broking platform. The consumer may be more familiar with or seek to do business with a particular mortgage broker firm but the platform is offered by the bank. The brand name may include something like a "powered by" label in the brand name, software product name or software product description.</p> <p>The draft rules do not require additional metadata to be held or exposed via the CDR Register APIs.</p>		
10.	CDR Register (Participant Portal)	ADR	Sch. 1, clause 2.3(2) and 2.3(3) 5.15(a)(vi) 5.24(bc)	N/A	<p>Participant Portal changes are required.</p> <p>The rule changes associated to the introduction of CDR Representative Arrangements will require additional functions to be added to the CDR Participant Portal. These functions will enable the principal (accredited person) to:</p> <ul style="list-style-type: none"> • notify the Data Recipient Accreditor when a CDR representative arrangement has been established; and • manage these arrangements by providing updated information as needed. <p>The details of these CDR Representative arrangements will also be made available on the public CDR Register via links from the find-a-provider page.</p>	TBD	TBD

Unaccredited OSPs

In December 2020, the Act was amended to allow the CDR Rules to authorise the collection of CDR data by parties who are not accredited on behalf of an accredited person. It is now possible for the CDR Rules to allow unaccredited intermediaries to collect CDR data on behalf of an ADR.

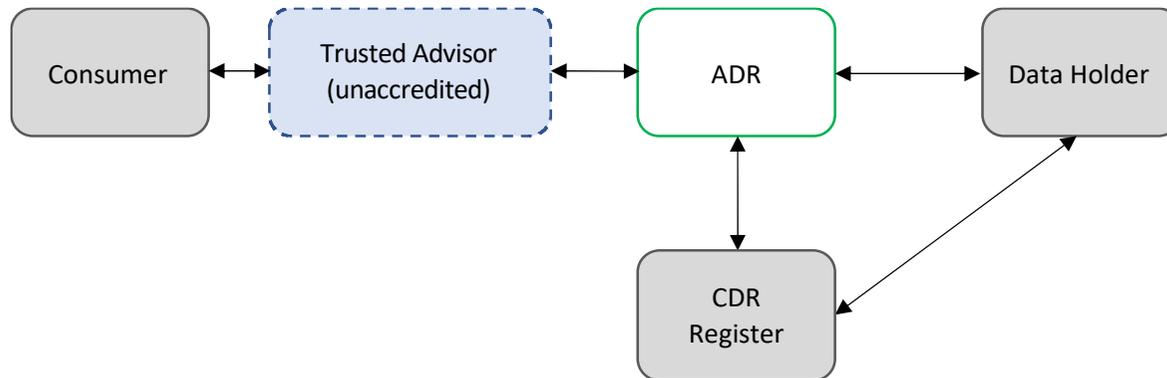


#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
11.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX Data Standards are anticipated for this item.	N/A	N/A
12.	Consumer Data Standards (Technical)	N/A	N/A	N/A	No technical standards changes required. The draft rules changes allow for unaccredited OSPs to collect data on behalf of their accredited principal. Where the OSP collects data on behalf of the principal, it continues to do so in accordance with the existing technical standards. The OSP is not known to the consumer and does not have a consumer-facing relationship it simply provides the technical integration between the principal and the data holder.	N/A	N/A

<i>Table 3. Unaccredited OSPs</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
13.	CDR Register Standards (Technical)	N/A	N/A	N/A	<p>No technical standards changes required.</p> <p>The OSP is not an accredited person but instead acts under the principal's accreditation held by the CDR Register. The Register APIs currently expose all data related to the accredited person (the principal) to facilitate registration and integration with the Data Holder.</p>	N/A	N/A
14.	CDR Register (Participant Portal)	ADR	N/A	N/A	<p>Accreditation changes required.</p> <p>The collection arrangement question in the accreditation application form will become redundant when this rule change is made and, accordingly, it will be removed. Additionally, features introduced to establish a relationship between a provider's Brand and a principal's Software Product during on-boarding will also become redundant and will be removed.</p>	TBD	TBD

Trusted Advisers

Schedule 3 amends the CDR Rules to allow a consumer to consent to an accredited person disclosing a consumer's CDR data to a person within a specified class (referred to as 'trusted advisers'). The intention is to facilitate current consumer practices of sharing their data with trusted third parties in order to receive advice or a service, and increase convenience and control for consumers by enabling them to use the CDR to share their data with their chosen trusted advisers. The accredited person cannot make the nomination of a trusted adviser or the giving of a TA disclosure consent a condition for the supply of goods and services requested by the CDR consumer.



Given the importance of CDR consumers understanding the effect of consenting to the disclosure of their CDR data to non-accredited persons, disclosures are subject to CX standards to be made by the Data Standards Body (rule 8.11(1)). This will ensure the CDR consumer is provided with adequate information to give informed consent, for example, information that the use of the data by the recipient will not be covered by the CDR regime and the recipient may not have obligations under the *Privacy Act 1988*.

Rule 7.5A(2) provides that disclosure of CDR data under a TA disclosure consent is not a permitted use or disclosure until the earlier of a date to be determined or when the Data Standards Chair makes consumer experience data standards for disclosure of CDR data to trusted advisers. The specified date is expected to be three months after the commencement of the rules.

Table 4. Trusted Advisers

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
15.	TA Disclosure consent: Disclosure notification	ADR	8.11(1)(c)(iv)	MUST	CX standards are proposed that would require ADRs to ensure that CDR consumers are able to make informed decisions about the disclosure of data outside the CDR system. This item will feature alongside the equivalent insight disclosure notification in an overall 'disclosure to non-accredited persons' standard.	TBD in accordance with the date specified in the rules, which is expected to be three months after the commencement of the rules	TBD in accordance with the date specified in rules, which is expected to be three months after the commencement of the rules
16.	Disclosure consent: Collection source	ADR	4.10(1)(a)(i)	MUST SHOULD	The existing CX standards for disclosure consent are expected to apply to TA disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.
17.	Disclosure consent: Descriptions of data to be collected and disclosed	ADR	4.10(1)(a)(i)	MUST	The existing CX standards for disclosure consent are expected to apply to TA disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.
18.	Withdrawal: Disclosure consent	ADR	4.10(1)(a)(i)	MUST	The existing CX withdrawal standard for disclosure consent is expected to apply to TA disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.

Table 4. Trusted Advisers

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
19.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX standards are anticipated in relation to this item.	N/A	N/A
20.	Consumer Data Standards (Technical)	N/A	N/A	TBD	<p>Technical changes may be required.</p> <p>No data standards changes are required where consumers consent to share data with an ADR they have a direct relationship with. Disclosure of data to a trusted advisor is done so at the discretion of the ADR through services offered by the ADR. For example, a small business consumer performs regular account reconciliation with an online accounting solution but uses an accountant for end of year financial statement. The accounting software is an ADR and the small business is the eligible consumer that has a customer relationship with the ADR. The ADR discloses the consumer’s data to the trusted advisor through a mechanism provided by the ADR.</p> <p>Where the consumer does not have a direct relationship with the ADR but instead only has a relationship with the trusted advisor, a separate consultation will be developed to consider the streamlined secure sharing of data using an ADR and onward disclosure of data to the trusted advisor under a consumer's full consent. For example, an individual who at tax return time engages an accountant (the trusted advisor) to perform all account reconciliation and tax return activities on their behalf using an online accounting software (the ADR), who is not themselves required to be a customer of the ADR.</p>	TBD	TBD
21.	CDR Register Standards (Technical)	N/A	N/A	N/A	<p>No technical standards changes required.</p> <p>The draft v3 rules do not require additional metadata to be held or exposed via the CDR Register APIs.</p>	N/A	N/A

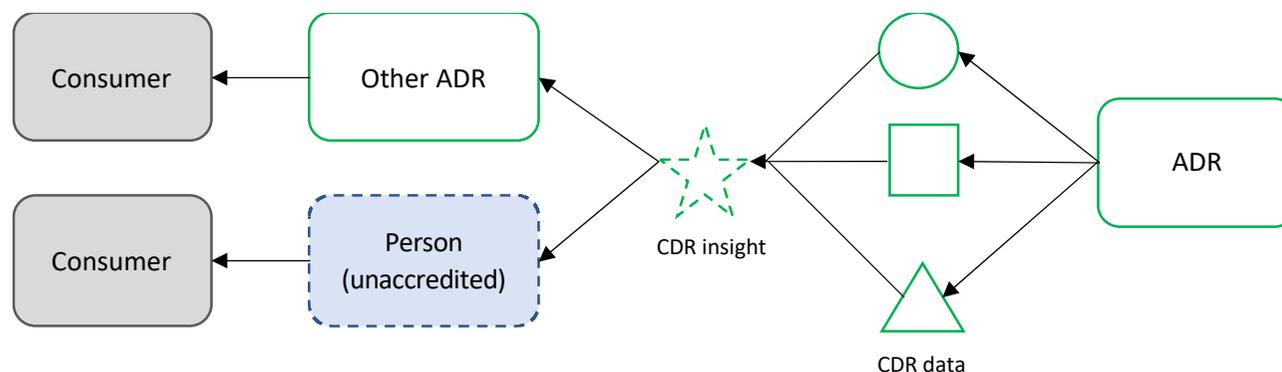
Table 4. Trusted Advisers							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
22.	CDR Register (Participant Portal)	ADR	N/A	N/A	<p>Reporting changes required.</p> <p>The draft v3 rules change Reporting obligations under Rule 9.4. These additional reporting obligations require the collection of additional values in the CDR Participant Portal <i>Rule 9.4 Report</i> function.</p>	TBD	TBD

CDR Insights

Rule 1.10A(3) defines an insight disclosure consent as a consent given by a CDR consumer for an accredited data recipient to disclose particular CDR data (the CDR insight: see rule 1.7(1)) to a specified person for a specified purpose, which are to:

- identify the consumer
- verify the consumer's account balance
- verify the consumer's income, or
- verify the consumer's expenses

For these purposes, 'verify' means to confirm, deny or provide some simple information about the consumer's identity, account balance, income or expenditure based on their CDR data. These CDR insights would allow consumers to securely provide and confirm relevant factual information about themselves, while giving the recipient comfort in its authenticity and accuracy. These purposes are intended to support the sharing of information that the consumer could themselves confirm and understand.



ADRs would be responsible for ensuring that the CDR insights they disclose align with the purpose consented to by the consumer. For example, CDR insights could be used to:

- confirm with a 'yes' or 'no' that the personal information provided in an application matches the information held by a bank
- confirm with a 'yes' or 'no' that the consumer's account balance is or is not sufficient to meet a particular payment
- provide a consumer's actual account balance at a specific point in time
- provide an alert to a merchant if a direct debit payment will fail, or
- provide the consumer's average income over a specific period of time

Rule 4.11(3)(ca) requires an accredited person to give an explanation of the CDR insight to the CDR consumer when seeking the insight disclosure consent that will make it clear what the CDR insight would reveal or describe. The CDR Rules do not require a CDR insight to be shown to a consumer prior to it being disclosed. However, where practical, this step could be taken to assist the consumer's understanding of what the CDR insight would reveal or describe and help meet the accredited person's obligation under rule 4.11

Rule 7.5A(4) provides that disclosure of CDR data under an insight disclosure consent is not a permitted use or disclosure until the earlier of a date to be determined in the rules or when the Data Standards Chair makes consumer experience data standards for disclosure of CDR insights.

Rule 8.11(1A) states that the standards that relate to obtaining insight disclosure consents must include provisions that cover the following:

- (a) how the accredited person can meet the requirement to explain a CDR insight in accordance with paragraph 4.11(3)(ca);
- (b) ensuring that the CDR consumer is made aware that their data will leave the CDR system when it is disclosed.

Rule 8.11(1)(c)(v) contains new requirements for data standards to be made about disclosure and security of CDR data that is disclosed in a CDR insight, and the processes by which insight disclosure consents are obtained, including ensuring the consumer understands their data will leave the CDR system and explaining the CDR insight in accordance with rule 4.11 (rule 8.11(1A)).

<i>Table 5. Insight Disclosure</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
23.	Insight Disclosure consent: Insight descriptions	ADR	1.14(3)(ea), 4.11(3)(ca), 7.9(4), 8.11(1A)	MUST	Standards are proposed that will cover how accredited persons can meet the requirement to explain a CDR insight in accordance with rule 4.11(3)(ca). This is expected to include requirements in relation to how to make clear to the CDR consumer what the CDR insight would reveal or describe. It is expected that this requirement will need to be reflected on the dashboard.	TBD in accordance with the date specified in the rules, which is expected to be three months after the commencement of the rules	TBD in accordance with the date specified in rules, which is expected to be three months after the commencement of the rules
24.	Insight Disclosure consent: Disclosure notification	ADR	8.11(1A)	MUST	Standards are proposed that would ensure that CDR consumers are able to make informed decisions about the disclosure of data outside the CDR system when it is disclosed. This item will feature alongside the equivalent TA disclosure notification in an overall 'disclosure to non-accredited persons' standard.	TBD in accordance with the date specified in the rules, which is expected to be three months after the commencement of the rules	TBD in accordance with the date specified in rules, which is expected to be three months after the commencement of the rules
25.	Disclosure consent: Collection source	ADR	4.10(1)(a)(i)	MUST SHOULD	The existing standards for disclosure consent are expected to apply to insight disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.

Table 5. Insight Disclosure

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
26.	Disclosure consent: Descriptions of data to be collected and disclosed	ADR	4.10(1)(a)(i)	MUST	The existing standards for disclosure consent are expected to apply to insight disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.
27.	Withdrawal: Disclosure consent	ADR	4.10(1)(a)(i)	MUST	The existing withdrawal standard for disclosure consent is expected to apply to insight disclosures. An amendment to the standards is proposed to clarify this application.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.	The existing standards were made in June 2021. Timing of clarification TBD in accordance with the rules.
28.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX standards are anticipated in relation to this item.	N/A	N/A
29.	Consumer Data Standards (Technical)	N/A	N/A	N/A	No technical standards changes required. The technical standards do not currently control the transfer of data between an accredited person to other persons. The rules allow for the transfer of CDR insights data between an accredited person (ADR) and other persons as long as appropriate consent is obtained. While the rules define obligations that ADRs must meet in order to make these transfers there is no requirement for the DSB to make technical standards for this transfer.	N/A	N/A

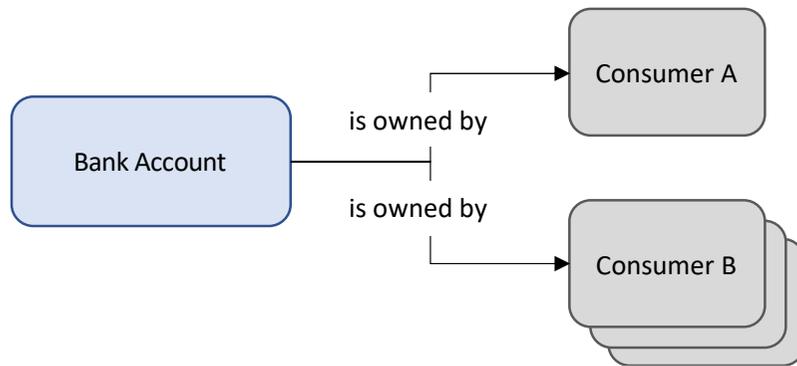
<i>Table 5. Insight Disclosure</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
30.	CDR Register (Technical Standards)	N/A	N/A	N/A	No technical standards changes required. The rules do not require additional metadata to be held or exposed via the CDR Register APIs.	N/A	N/A
31.	CDR Register (Participant Portal)	ADR	N/A	N/A	Reporting changes required. The draft rules change Reporting obligations under Rule 9.4. These additional reporting obligations require the collection of additional values in the CDR Participant Portal <i>Rule 9.4 Report</i> function.	TBD in accordance with the date specified in the rules, which is expected to be three months after the commencement of the rules	TBD in accordance with the date specified in the rules, which is expected to be three months after the commencement of the rules

Joint Accounts

The proposed draft v3 rules include a change to a ‘single consent’ model for joint accounts. CDR data that relates to a joint account can be disclosed under the Rules only in accordance with the disclosure option that applies to the account. Division 4A.2A sets out:

- the three disclosure options, with the default option being the pre-approval option;
- an obligation for data holders to provide a disclosure option management service (DOMS) for all joint accounts through which joint account holders can change the disclosure option that applies to the account, or propose a change to the other account holders;
- when one joint account holder proposes to change the disclosure option—a process by which the other joint account holders can either agree with or reject the proposal; and
- some associated notification requirements.

Data holders must offer the pre-approval option and non-disclosure option on joint accounts, and may offer the co-approval option on an optional basis (rules 4A.4(2) and (3)). If the pre-approval option applies, any joint account holder can choose that the co-approval option will apply.



A change from the non-disclosure option to another option, or a change from the co-approval option to the pre-approval option (if offered by the data holder), requires the agreement of all the joint account holders.

If the co-approval option is offered by the data holder and applies to the joint account—the data holder must ask the requesting account holder to authorise the disclosure of the requested data, seek the other account holders’ approval for the disclosure, then disclose the data in accordance with the request.

On 30 April 2021, Treasury announced that requirements for banks to implement the joint account requirements that would have applied from November 2021 would be deferred, with new compliance dates to be set following consultation. The draft v3 rules amend the commencement table in rule 6.6 of Schedule 3 to the CDR Rules and set 1 April 2022 as the new compliance date for joint account data sharing in the banking sector.

Draft v3 rule 4A.6 requires data holders to notify joint account holders of the following matters in relation to the account (for new accounts, when the account is opened, or for existing accounts, at least 7 days prior to joint accounts being in scope for sharing under the Rules). This notification must be made, in accordance with any data standards and via the ordinary method for contacting each joint account holder.

Draft v3 rule 4A.16 requires data holders to allow joint account holders to set certain notification preferences. If data standards are in place, this must be done in line with those standards. This would allow consumers to set preferences such that they would not receive certain notifications that data holders would otherwise be required to provide.

The draft v3 rules also include transitional provisions that:

- require relevant data holders to continue to comply with the former joint account transitional provisions until 1 April 2022, when they must begin to comply with the draft v3 rules;
- require data holders to notify consumers with joint accounts of the change to the default setting to share at least a week before the commencement date; and
- provide that joint accounts that are currently set to the ‘no disclosure option’ are not switched to the pre-approval option on the commencement date.

The joint account items below have been informed by the Consumer Policy Research Centre’s recent [community sector engagement on joint accounts](#), [CX research](#), [a public workshop on joint accounts](#), 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.

<i>Table 6. Joint Accounts</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
32.	Notification standard: Pre-sharing notice for joint accounts	DH	4A.6(3)	TBD	Standards will be consulted on in relation to Rule 4A.6, where joint account holders will be notified about matters relating to joint account sharing when a new joint account is opened or, for existing accounts, 7 days prior to joint accounts being in scope for sharing.	Expected in Q4 2021 to allow for a 6-month implementation timeframe. Actual date TBD in accordance with the date the rules are made.	Expected to be 1 April 2021. Actual date TBD in accordance with the finalised rules.
33.	Notification standard: Joint account	DH	4A.16(3)	TBD	Standards will be consulted on to allow notification preferences to be set based on consumer preference. This would allow consumers to choose to not receive certain notifications and could consider the granularity of notification preference controls.	Expected in Q4 2021 to allow for a 6-month implementation	Expected to be 1 April 2021. Actual date TBD in

Table 6. Joint Accounts

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
	notification management				<p>Purpose: Allow consumers to manage and set notifications related to joint accounts based on their preferences.</p>	timeframe. Actual date TBD in accordance with the date the rules are made.	accordance with the finalised rules.
34.	<p>Notification standard: Alerts sent to other the joint account holder(s)</p>	DH	4A.5(8), existing rules 1.15(1)(ba), 4.22(a)	MUST	<p>Standards will be proposed to require DHs to alert a joint account holder when they are about to take an action that will result in a notification being sent to the other joint account holder(s).</p> <p>For example, when changing a disclosure option via DOMS; when removing an approval related to a specific authorisation; or during the authorisation flow when selecting to share data from a joint account.</p> <p>Purpose: Facilitate safe and informed joint account sharing and management.</p>	Expected in Q4 2021 to allow for a 6-month implementation timeframe. Actual date TBD in accordance with the date the rules are made.	Expected to be 1 April 2021. Actual date TBD in accordance with the finalised rules.
35.	<p>Notification standard: Joint account holders flagged as vulnerable</p>		Existing rule 4.22(a)	SHOULD	<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 not be alerted when that authorisation is initiated.</p> <p>Purpose: Reduce cognitive barriers to data sharing for consumers experiencing vulnerability</p>	Expected in Q4 2021 to allow for a 6-month implementation timeframe. Actual date TBD in accordance with the date the rules are made.	Expected to be 1 April 2021. Actual date TBD in accordance with the finalised rules.
36.	<p>Notification standard: Pending approval status</p>		Existing rule 4.22(a)	MUST/SHOULD	<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 could apply where a ‘co-approval’ option has been chosen by the joint account holder(s) 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.</p>	Expected in Q4 2021 to allow for a 6-month implementation timeframe. Actual date TBD in accordance with	Expected to be 1 April 2021. Actual date TBD in accordance with the finalised rules.

Table 6. Joint Accounts

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					<p>This standard will be considered for broader application, such that data holders can introduce additional information of this nature to the authorisation flow for other account types where required.</p> <p>Purpose: Increase system status visibility to help users understand when further action is needed to successfully share data.</p>	the date the rules are made.	
37.	Withdrawal: Joint accounts	DH	4A.13(2); 4A.15(1)(d) (v)	MUST	<p>This will propose that DHs advise joint account holders of the consequences of the withdrawal.</p> <p>This is expected to approval to the removal of a disclosure option, i.e. changing to a non-disclosure option, and the removal of an approval.</p>	Expected in Q4 2021 to allow for a 6-month implementation timeframe. Actual date TBD in accordance with the date the rules are made.	Expected to be 1 April 2021. Actual date TBD in accordance with the finalised rules.
38.	Consumer Data Standards (CX)	N/A	N/A	N/A	No additional CX Data Standards are anticipated for this item.	N/A	N/A
39.	Consumer Data Standards (Technical)	N/A	N/A	N/A	<p>No technical standards changes required.</p> <p>The rules change the disclosure options for joint account data.</p> <p>However, the technical standards do not define obligations that Data Holders must meet to obtain the disclosure consent of secondary account holders. The proposed draft v3 rules change the way in which consent is provided for joint accounts but does not include requirements for technical standards. Similar to the Joint Account Management Service, the way in which Data Holders implement these proposed draft v3 rules is left to the implementation Data Holders. Joint Accounts continue to be shareable through the existing standards framework for selection of accounts to be associated with the consumer's authorised consent that is held by the data</p>	N/A	N/A

Table 6. Joint Accounts

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					holder. Further, joint account data is currently covered by the existing technical APIs.		
40.	CDR Register (Technical Standards)	N/A	N/A	N/A	<p>No technical standards changes required.</p> <p>The draft v3 rules do not require additional metadata to be held or exposed via the CDR Register APIs.</p>	N/A	N/A
41.	CDR Register (Participant Portal)	ADR, DH	9.4	N/A	<p>Reporting changes required.</p> <p>The draft v3 rules change Reporting obligations. These additional reporting obligations require the collection of additional values in the CDR Participant Portal <i>Rule 9.4 Report</i> function.</p>	TBD in accordance with the date specified in the rules	TBD in accordance with the date specified in the rules

Direct to Consumer Request Service

Under Part 3 of the CDR Rules, data holders are required to implement an online service that allows consumers to directly request their CDR data in a human readable form and in accordance with the data standards.

In order to allow further consultation about the way in which direct to consumer obligations should be provided for and in machine-readable form via APIs (and the way in which the data standards should provide for this), the Rules amend clause 6.6 of Schedule 3 to remove the compliance date for the Part 3 obligations in the banking sector.

<i>Table 7. Direct to Consumer</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
42.	General	N/A	Part 3	N/A	As proposed in DP089 and DP167 , no CX Data Standards are anticipated for this issue and any technical standards consultation will be deferred in line with the rules. If Direct To Consumer obligations are re-introduced at a later date, options for standards will be considered at that time.	N/A	N/A

ADR Representation

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. The proposal outlined in the below table progresses this thinking and proposes a new field to accommodate concurrent consents and the newly proposed access arrangement models, such as affiliates and CDR representatives.

<i>Table 8. ADR Representation</i>							
#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
43.	ADR representation in DH authorisation flow and dashboards	ADR DH	1.15(ba) and (bb), 4.23(2)	ADR: MAY DH: MUST	<p>This issue is reflected in: Table 1. Sponsored Accreditation Table 2. CDR Representative Model</p> <p>This issue relates to the provision of CX standards to support consistent ADR presentation in dashboards, authentication, and authorisation spaces.</p> <p>ADRs are currently represented inconsistently, and the current requirement to display an ADR’s legal entity name in the authorisation flow may not correspond with the entity the consumer interacts with as the CDR begins to see more complex accreditation models.</p> <p>This consultation will propose that DHs display the ADR’s brand name in authentication and authorisation related artefacts where appropriate. This proposal will rely on the existing rules requiring DHs to display specified information that the Register holds in relation to an accredited person.</p> <p>This consultation will also explore if these same fields should be required on dashboards, including DH dashboards and ADR dashboards in relation to AP disclosures.</p> <p>The proposal will also query if additional consent-related fields are warranted for concurrent consents and complex sharing models, such as affiliates and CDR representatives. Consultation will be conducted to determine if or how these fields</p>	TBD	TBD

Table 8. ADR Representation

#	Issue	Entity	Rules	Proposed Obligation	Standards description	Standards made:	Comply:
					could be facilitated through technical standards – such as the authorisation request – or the Register. Purpose: Achieve comprehensible and contextually appropriate presentation of ADRs during authentication, authorisation, and on consumer dashboards.		
44.	Consumer Data Standards (Technical)	N/A	1.15(ba) and (bb), 4.23(2)	N/A	Changes may be required. If the disclosure of additional data relating to the representation of ADR relationships is required to be communicated through the authorisation flow and on consumer dashboards, changes to the authorisation request may be required to facilitate this.	N/A	N/A
45.	CDR Register (Technical Standards)	N/A	1.15(ba) and (bb), 4.23(2)	N/A	Changes may be required. If the disclosure of additional data relating to the representation of ADR relationships is required to be communicated through the authorisation flow and on consumer dashboards, changes to the authorisation request may be required to facilitate this.	N/A	N/A
46.	CDR Register (Participant Portal)	ADR	9.4	N/A	Changes may be required. If CDR Register (Technical Standards) are required, as mentioned in point Error! Reference source not found. it will flow on to the Participant Portal in order for ADRs to provide additional details during the on-boarding process.	TBD in accordance with the date specified in the rules	TBD in accordance with the date specified in the rules

Implementation Considerations

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

While a [Noting Paper](#) is not part of a formal decision proposal consultation, the DSB strongly encourages CDR participants to provide feedback to help inform data standards development in relation to these key areas of work.

Consumer Data Right Board

Meeting Details

Date: 17 August 2021
Time: 9:00 – 10:30am
Locations: Canberra – Executive Dining Room (Level 5)
 Multi – Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC
Observer	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Observer	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Observer	s 22	Director, ACCC
Secretariat	s 22	Director, Treasury
Secretariat	s 22	Program Officer, Treasury

AGENDA

Item	Verbal / Paper	Responsibility
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1.5	Action Items	Paper	Ms Quinn
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Consumer Data Right Board

s 22



The following action items remain open:

s 22



- CDRB/201020/2.5 (Direct to consumer, assigned to Treasury).

s 22



The remainder of this document is outside the scope of the request and has been deleted

CONSUMER DATA RIGHT BOARD

CONSUMER DATA RIGHT BOARD MINUTES - DRAFT

Date:	20 July 2021	Time:	9:00am – 10:30am
Chair:	Meghan Quinn (Chair) (Tsy)		
Members:	Andrew Stevens (DSB), Angelene Falk (OAIC), Peter Crone (ACCC)		
Advisers:	Kate O'Rourke (Tsy), Paul Franklin (ACCC)		
Observers/Presenters:	Jessica Robinson (Tsy), s 22 (Tsy), Daniel Ramos (ACCC),		
Apologies:	s 22 (ACCC), Jodi Ross (TSY)		
Secretariat:	s 22 (Tsy), s 22 (Tsy)		
Meeting opened at:	9.00am		

Item 1	Opening Remarks	Lead: Meghan Quinn
<u>OUTCOME</u>	Verbal update provided	

s 22

[Redacted content]

The Board noted that the following action items remain open, with Treasury to provide an update at the appropriate time.

- CDRB/201020/2.5 (*Direct to consumer*).

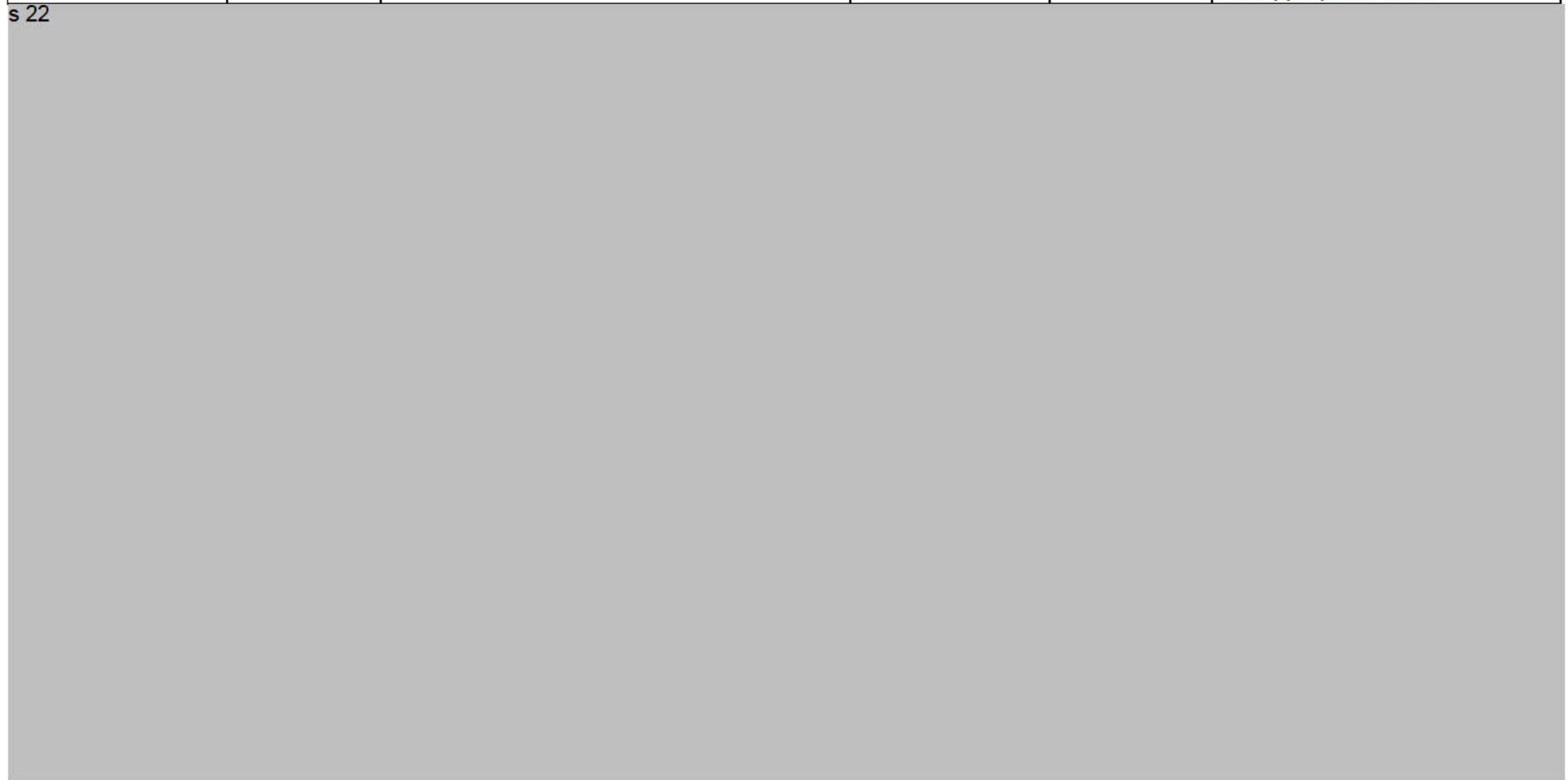
s 22

[Redacted content]

20 July 2021 CDR Board – Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement “direct to consumer” to ensure that it addresses privacy issues appropriately.	Treasury	Early 2021 (possibly out of session)	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

s 22



Consumer Data Right Board

Meeting Details

Date: 21 September 2021
Time: 9:00 – 11:00am
Locations: Multi - Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Kat Savelli	a/g General Manager, Solution Delivery & Operations, ACCC
Observer	David Jones	General Manager, Regulatory, ACCC
Observer	Jessica Robinson	a/g First Assistant Secretary, CDR Division, Treasury
Observer	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Observer	Jocelyn Cooper	a/g Assistant Secretary, CDR Division, Treasury
Observer	Bruce Cooper	a/g Deputy Commissioner, OAIC
Observer	s 22	Director, ACCC
Secretariat	s 22	Director, Treasury
Secretariat	s 22	Assistant Director, Treasury

Apologies	Representative	Position
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC

AGENDA

Item	Verbal / Paper	Responsibility
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s 22



Consumer Data Right Board

s 22

1.5	Action Items	Paper	Ms Quinn	
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s 22

- The following action items remain open:
- CDRB/201020/2.5 (*Direct to consumer*).

s 22

The remainder of this document is outside the scope of the request and has been deleted

CONSUMER DATA RIGHT BOARD

CONSUMER DATA RIGHT BOARD MINUTES - DRAFT

Date:	17 August 2021	Time:	9:00am – 10:30am
Chair:	Meghan Quinn (Chair) (Tsy)		
Members:	Andrew Stevens (DSB), Angelene Falk (OAIC), Peter Crone (ACCC)		
Advisers:	Kate O'Rourke (Tsy), Paul Franklin (ACCC)		
Observers/Presenters:	Jessica Robinson (Tsy), Daniel Ramos (ACCC), Jodi Ross (ACCC), s 22 (ACCC)		
Apologies:	Nil		
Secretariat:	s 22 (Tsy), s 22 (Tsy)		
Meeting opened at:	9:00am		

Item 1	Opening Remarks	Lead: Ms Meghan Quinn
OUTCOME	Verbal update provided	

s 22

[Redacted content]

The Chair noted that the following action items remain open, with Treasury, ACCC, and the DSB to provide an update at an appropriate time:

s 22

[Redacted content]

- CDRB/201020/2.5 (*Direct to consumer*).

s 22

[Redacted content]

17 August 2021 CDR Board – Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement “direct to consumer” to ensure that it addresses privacy issues appropriately.	Treasury	To be confirmed	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

s 22



Consumer Data Right Board – Meeting 20

Meeting Details

Date: 19 October 2021
Time: 9:00 – 10:30am
Locations: Multi - Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member (delegate)	Barry Thomas	General Manager, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Member	Jonathon Thorpe	Digital Transformation Agency (from agenda item 3)
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Bruce Cooper	a/g Deputy Commissioner, OAIC
Observer	Melanie Drayton	Assistant Commissioner, OAIC
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC
Observer	David Jones	General Manager, Regulatory, ACCC
Observer	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Observer	Jodi Ross	Assistant Secretary, CDR Division, Treasury
Observer	s 22	Director, ACCC
Secretariat	s 22	Director, Treasury
Secretariat	s 22	Assistant Director, Treasury

Apologies	Representative	Position
Member	Andrew Stevens	Data Standards Chair, Data Standards Body

AGENDA

Item	Verbal / Paper	Responsibility
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s 22



Consumer Data Right Board – Meeting 20

s 22



1.5	Action Items	Paper	Ms Quinn	
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s 22



	The following action items remain open: <ul style="list-style-type: none">• CDRB/201020/2.5 (<i>Direct to consumer</i>).			
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s 22



The remainder of this document is outside the scope of the request and has been deleted

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CONSUMER DATA RIGHT BOARD

CONSUMER DATA RIGHT BOARD MINUTES - DRAFT

Date:	21 September 2021	Time:	9:00am – 11:00am
Chair:	Meghan Quinn (Chair) (Tsy)		
Members:	Andrew Stevens (Data Standards Chair), Angelene Falk (OAIC), Peter Crone (ACCC)		
Advisers:	Jessica Robinson (Tsy, acting for Kate O'Rourke), Paul Franklin (ACCC)		
Observers/Presenters:	Jocelyn Cooper (Tsy, acting for Jessica Robinson), Kat Savelli (ACCC, acting for Daniel Ramos), Jodi Ross (Tsy), ^{s 22} (ACCC), Bruce Cooper (OAIC), David Jones (ACCC)		
Apologies:	Kate O'Rourke (Tsy), Daniel Ramos (ACCC)		
Secretariat:	^{s 22} (Tsy), ^{s 22} (Tsy)		
Meeting opened at:	9:00am		

Item 1	Opening Remarks	Lead: Ms Meghan Quinn
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^{s 22}

The Chair noted that the following action items remain open, with Treasury, ACCC, and the DSB to provide an update at an appropriate time:

- CDRB/201020/2.5 (*Direct to consumer*)

^{s 22}

21 September 2021 CDR Board – Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement “direct to consumer” to ensure that it addresses privacy issues appropriately.	Treasury	To be confirmed	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

s 22



Consumer Data Right Board – Meeting 21

Meeting Details

Date: 16 November 2021
Time: 9:00 – 10:30am
Locations: Multi - Australia

Attendees	Representative	Position
Chair	Meghan Quinn	Deputy Secretary, Treasury
Member	Peter Crone	Commissioner, ACCC
Member	Andrew Stevens	Data Standards Chair, Data Standards Body
Member	Angelene Falk	Australian Information Commissioner
Member	Jonathon Thorpe	Digital Transformation Agency (from agenda item 2.3)
Adviser	Kate O'Rourke	First Assistant Secretary, CDR Division, Treasury
Adviser	Paul Franklin	CDR Executive General Manager, ACCC
Observer	Bruce Cooper	a/g Deputy Commissioner, OAIC
Observer	Daniel Ramos	General Manager, Solution Delivery & Operations, ACCC
Observer	David Jones	General Manager, Regulatory, ACCC
Observer	Jessica Robinson	Assistant Secretary, CDR Division, Treasury
Observer	Fiona Walker	a/g Assistant Secretary, CDR Division, Treasury
Observer	Belinda Robertson	Assistant Secretary, CDR Division, Treasury
Observer	s 22	Director, ACCC
Secretariat	s 22	Director, Treasury
Secretariat	s 22	Program Officer, Treasury

Apologies	Representative	Position
Nil		

AGENDA

Item	Verbal / Paper	Responsibility
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s 22



Consumer Data Right Board – Meeting 21

s 22



1.5	Action Items Recommend that action item CDRB/201020/2.5 (<i>Direct to consumer</i>) is moved to be closed, noting that the inclusion of direct to consumer provisions in the rules has been indefinitely deferred. The item was first raised in October 2020.	Paper	Ms Quinn	
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s 22



The remainder of this document is outside the scope of the request and has been deleted

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CONSUMER DATA RIGHT BOARD

CONSUMER DATA RIGHT BOARD MINUTES - DRAFT

Date:	19 October 2021	Time:	9:00am – 10:30am
Chair:	Meghan Quinn (Chair) (Tsy)		
Members:	Barry Thomas (Data Standards Body, delegate for Andrew Stevens), Angelene Falk (OAIC), Peter Crone (ACCC)		
Advisers:	Kate O'Rourke (Tsy), Paul Franklin (ACCC)		
Observers/Presenters:	Jessica Robinson (Tsy), Jodi Ross (Tsy), Daniel Ramos (ACCC), David Jones (ACCC), s 22 (ACCC), Melanie Drayton (OAIC)		
Apologies:	Andrew Stevens (Data Standards Chair), Bruce Cooper (OAIC)		
Secretariat:	s 22 (Tsy), s 22 (Tsy)		
Meeting opened at:	9:00am		

Item 1	Opening Remarks	Lead: Ms Meghan Quinn
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s 22

The Chair noted that the following action items remain open, with Treasury to provide an update at an appropriate time:

- CDRB/201020/2.5 (*Direct to consumer*)

s 22

16 November 2021 CDR Board – Action Items Summary

<i>Action Item</i>	<i>Meeting Date</i>	<i>Description</i>	<i>Responsible Party</i>	<i>Due Date</i>	<i>Status</i>
CDRB/201020/2.5	20 October 2020	Board should review the proposed consultation paper on how to implement “direct to consumer” to ensure that it addresses privacy issues appropriately.	Treasury	To be confirmed	Reviewed at the 18 May 2021 meeting at agenda item 1.5. Treasury to provide an update at the appropriate time.

s 22



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CONSUMER DATA RIGHT BOARD

CONSUMER DATA RIGHT BOARD MINUTES - DRAFT

Date:	16 November 2021	Time:	9:00am – 10:30am
Chair:	Meghan Quinn (Chair) (Tsy)		
Members:	Andrew Stevens (Data Standards Chair), Angelene Falk (OAIC), Peter Crone (ACCC)		
Advisers:	Kate O'Rourke (Tsy), Paul Franklin (ACCC)		
Observers/Presenters:	Jessica Robinson (Tsy), Fiona Walker (Tsy), Belinda Robertson (Tsy), Daniel Ramos (ACCC), David Jones (ACCC), s 22 (ACCC), Bruce Cooper (OAIC)		
Apologies:	Jonathon Thorpe (DTA)		
Secretariat:	s 22 (Tsy), s 22 (Tsy)		
Meeting opened at:	9:00am		

Item 1	Opening Remarks	Lead: Ms Meghan Quinn
s 22		
	Members agreed to close action item CDRB/201020/2.5 (<i>Direct to consumer</i>), noting that Treasury would keep other agencies informed of any further to proceed with rules changes to introduce Direct to consumer provisions.	
s 22		

s 22

From: CX <xx@xxxxxxxxxxxxxxxxxxxxxxxxxxx.xxx.xx>

Date: Monday, 28 February 2022 at 12:58 pm

To: s 47F

Cc: s 22

Subject: Re: Attn: s 22

Hey s 47F

Great to chat just then.

Here are the links I promised:

- [Direct to Consumer](#) – data standards consultation
- The most recent [Direct to consumer deferral announcement](#)
- The [direct to consumer exemption](#) – which I believe you have already seen;

The direct-to-consumer exemption link may not be the most up to date as it refers to Nov 2021. There are exemptions for individual DHs that defer to July 2022, but I'm certain it's deferred indefinitely. It's notoriously hard to find these details so I've just put out a request for the most up to date info.

Hope the above helps.

Best,

s 22

Consumer Experience Lead

Data Standards Body | Consumer Data Right Division

E s 22

T s 22

W www.consumerdatastandards.gov.au

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From: s 47F
Date: Thursday, 24 February 2022 at 12:08 pm
To: CX <cx@consumerdatastandards.gov.au>
Subject: RE: Attn: s 22

Hi s 22

I can make that time Monday, and happy for you to send and invite if that works.

Thanks

Kind Regards,

s 47F

s 47F

From: CX <cx@consumerdatastandards.gov.au>
Sent: Thursday, 24 February 2022 10:40 AM
To: s 47F; s 22
s 22
Subject: Re: Attn: s 22

Hey s 47F

Thanks for reaching out – a chat would be useful.

Are you free on Monday at 12, or Tuesday at 10:30 (AEDT)?

I can send through an invite if so – or please let me know if those times don't work.

Best,

s 22

Consumer Experience Lead

Data Standards Body | Consumer Data Right Division

E s 22

T s 22

W www.consumerdatastandards.gov.au

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From: s 47F
Date: Tuesday, 22 February 2022 at 4:04 pm
To: CX <cx@consumerdatastandards.gov.au>
Subject: Attn: s 22

Hi s 22

It would be great to chat as we are a service provider with the solution in the Data Holder to consumer direct channel.

Would you have some time?

Kind Regards,

s 47F

s 47F

DataBench Pty Ltd

Lvl 9/123 Albert St, Brisbane City. QLD 4000

p: s 47F

E: s 47F

W: www.databench.com.au

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From: s 22
To: s 22
Cc: s 22 ; s 22
Subject: FW: Zendesk Question 1608 - Direct to Consumer Obligations [ACCC-ACCCANDAER.FID2815417] [SEC=OFFICIAL]
Date: Friday, 22 July 2022 3:11:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image006.png](#)

OFFICIAL

From: s 22
Sent: Friday, 15 July 2022 1:47 PM
To: s 22 ; s 22
s 22 ; s 22
Subject: RE: Zendesk Question 1608 - Direct to Consumer Obligations [ACCC-ACCCANDAER.FID2815417] [SEC=OFFICIAL]

Hi s 22,

Yes, I think this is definitely one for us. Thank you for sharing!

s 22 and s 22 For info - the ACCC has received a Zendesk enquiry about timeframes for consultation re expanding Open Banking to direct-to-consumer sharing. One for next week, but I assume we will want to refer them to the CDR statutory review.

- Previous ACCC advice: [Response to queries:...~https://cdr-support.zendesk.com/hc/en-us/articles/360004343516-Response-to-queries-Deferral-of-joint-account-and-direct-to-consumer-obligations](https://cdr-support.zendesk.com/hc/en-us/articles/360004343516-Response-to-queries-Deferral-of-joint-account-and-direct-to-consumer-obligations)
- Rules for direct-to-consumer sharing are established under Part 3 of the CDR Rules (Consumer data requests made by eligible CDR consumers)
- Right now direct-to-consumer sharing under Part three is not included in the Banking (Schedule 3, Rule 6.6) or energy (Schedule 4) commencement schedules.

Cheers,

s 22
CDR Policy Issues Unit s 22

From: s 22
Sent: Friday, 15 July 2022 11:52 AM
To: s 22
Subject: FW: Zendesk Question 1608 - Direct to Consumer Obligations [ACCC-ACCCANDAER.FID2815417] [SEC=OFFICIAL]

OFFICIAL

Hi s 22 – I think this one might be for your team? Let me know if you agree and/or if we can help!

s 22

s 22

Consumer Data Right Division | Markets Group | The Treasury

Langton Crescent, Parkes ACT 2600

Ph: s 22 | M: s 22

cdr.gov.au | [Subscribe](#) to receive CDR updates

Consumer Data Right acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures and to elders both past and present.

LGBTIQ+ Ally

OFFICIAL

From: s 22

Sent: Friday, 15 July 2022 11:35 AM

To: s 22

Cc: s 22; s 22

s 22

Subject: Zendesk Question 1608 - Direct to Consumer Obligations [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID2815417]

OFFICIAL

Hi s 22

The ACCC Regulatory Guidance team has received the below Zendesk query (ZQ 1608) regarding the deferral of direct to consumer obligations:

I was wondering if any updated timelines were available regarding the deferral of 'direct to consumer' obligations. I see in your latest article that a consultation was planned to occur before November 2021. I was wondering if this consultation occurred and if not what the current timeline if any is?

As the question relates to CDR policy, we would be grateful for your team's input.

Thanks very much and please let us know if you would like to discuss further.

Warm regards,

s 22

Graduate – Regulatory Guidance | Regulatory Branch | Consumer Data Right Division

Australian Competition & Consumer Commission

Level 29M, 135 King Street, Sydney NSW 2000

T: s 22

www.accc.gov.au

The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.

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