

Senate Select Committee on Financial Technology and Regulatory Technology
Written questions on notice

ACCC

CDR – Education campaigns and consumer awareness

What initiatives are being undertaken to make Australians aware of the benefits of Open Banking as it is rolled out? What is the ACCC's plan for ensuring that as many consumers as possible are realising the benefits of this system?

In particular:

- What awareness and advertising campaigns are being planned about the rollout of Open Banking, by government and by industry?
- What funding commitments have been made towards this endeavour, and over what timeframe will they be rolled out?

Response

The ACCC in conjunction with Treasury is developing a comprehensive communication and education strategy which will be targeted to both consumers and industry. In developing and implementing this strategy, we are working closely with Treasury, the Office of the Australian Information Commissioner and the Data Standards Body.

The work includes educational materials, including videos and webinars, a dedicated website, stakeholder newsletters and proactive media engagement. Elements of the strategy have already commenced, the CDR website will be launched in June 2020 and consumer-focussed communications will commence from July 2020.

We are working with cross-government stakeholders to ensure consistency in communications to consumers and industry, and each agency involved in the delivery of the Consumer Data Right will play a role in delivering communications to consumers.

We have been funded \$350,000 in FY2019-20, which is being used among other things for development of a stand-alone CDR website and educational videos and a series of webinars.

CDR – accreditation processes

Xero argues in its submission to the inquiry (Submission 82, at pp. 6-8) that the accreditation process for CDR data recipients should be harmonised with the existing DSP Operational Framework and SSAM for third parties administered by the Australian Taxation Office. It states:

"The CDR introduces yet another concept underpinned by a new accreditation process – unique to Australia – of an Accredited Data Recipient to participate in the CDR initiative. This is an example of an accreditation process that should be consolidated with the DSP Operational Framework leveraging its standardised requirements. Consolidation would vastly reduce complexity, costs and capital requirements for CDR participants while increasing consumer outcomes through stronger innovation and competition." (Submission 82, p. 6)

What is the ACCC's response to Xero's views on CDR accreditation expressed in this submission?

Is the CDR accreditation process being designed to integrate with other accreditation processes administered by Commonwealth agencies, such as the ATO's DSP Operational Framework?

Response:

The Digital Service Provider Operational Framework defines a minimum set of security standards which must be met prior to digital service providers consuming Australian Taxation Office wholesale services. We have discussed with ATO the possibility of leveraging their framework for CDR.

The appropriate security controls to protect Consumer Data Right data for the unrestricted level of accreditation, under schedule 2 of the CDR Rules, were developed with advice from IT security risk experts. They also went through a public consultation process, as well as consultation with relevant government agencies: ATO, APRA, ACSC and OAIC.

In developing CDR requirements the ACCC has been mindful of the need to strike the right balance between adopting settings that foster consumer trust – such as security, reliability and integrity of the system, and settings that reduce friction for participants.

It is ACCC's intention to expand and grow the Consumer Data Right over time. The ATO's Digital Service Provider Operational Framework exists for a very specific purpose, and is not necessarily appropriate or fit-for-purpose for the wide range of data recipients who we expect will seek to participate in the Consumer Data Right over time. We are actively working on reducing barriers to entry to increase the Consumer Data Right's uptake and success (including considering leveraging other frameworks), while maintaining adequate security of the ecosystem.