September 2019 Release of Consumer Data Standards v1.0.0

30 September 2019

The Data Standards Body (DSB) is pleased to announce the 30 September 2019 release which is expected to become the initial binding Consumer Data Standards (CDS) for the Consumer Data Right (CDR) regime. The version 1.0.0 release of the CDS represents the baseline for implementation in accordance with the rules and phasing timetable made by the Australian Competition and Consumer Commission (ACCC).

The CDS intend to make it easier and safer for consumers to share access to the data collected about them by businesses, and – with their explicit approval – to share this data via application programming interfaces (APIs) with trusted, accredited third parties.

Since our previous release, the Treasury Laws Amendment (Consumer Data Right) Act 2019 received Royal Assent on the 12 August 2019. Andrew Stevens has also been appointed as the first Data Standards Chair, and CSIRO's Data61 was appointed as the DSB.

The changes made to the CDS since the July 2019 draft comprise a number of corrections and refinements identified in Decision Proposal 086, developed by the DSB. These changes result from the DSB's continued consultation with ecosystem participants and the need to accommodate with the latest version of the ACCC's rules and the Register's design.

The DSB recognises that consumer adoption is critical to the success for the CDR regime, consequently version 1.0.0 formally incorporates the mandatory CX requirements into the CDS. The mandatory requirements aim to offer consumers a consistent experience when engaging with CDR participants and are complimented by the CX Guidelines developed in consultation with the stakeholder community.

The CDS will continue to evolve from this point with the following types of changes anticipated:

- Clarifications and/or refinement of the standards identified as a part of the regular 8-week cadence identified in the CDS Operating Model;
- Issues resulting from the implementation and testing for the February 2020 operational milestone may result in CDS changes that require quick turnaround; and,
- Significant updates to the standards guided by CX research and developed through ongoing consultation, that are to be adopted in subsequent CDR implementation milestones.

As the CDR regime enters the testing of the rules and CDS in preparation for the February 2020 implementation, we will continue to utilise GitHub for the pilot of our published operating model with participants in the CDR ecosystem.

The DSB looks forward to ensuring the standards continue to evolve and incorporate new innovations. As they progress to become a reality for Australian consumers, we are committed to working with all CDR participants to build a strong and useful set of standards.

The background in summary:

- The DSB has been working transparently in public to create and refine draft technical standards since late July 2018, working in parallel with Treasury and the ACCC. The ACCC is responsible for the design of the rules relating to the CDR regime. Treasury has carriage of the legislation and Designation Instruments.
    - For a summary of how the process was initiated and how technical decisions have been made, see the following document attached to our 2nd of November draft:

      https://consumerdatastandards.org.au/wp-content/uploads/2018/11/Working-Draft_CDR_2-November-2018-1.pdf

- The ACCC has released draft versions of the applicable rules in December 2018, an updated version in April 2019, and a further lock down version of the latest rules on 2 September 2019.

- The DSB has worked closely with ACCC and Treasury to ensure the CDR standards issued align to the rules, the legislation and the Designation Instrument in a way that makes implementation of the regime as easy as possible from a technical perspective.

- The Interim Chair of the DSB invited 15 representatives from across the CDR ecosystem to form an Advisory Committee in July 2018 which has met every month since then to provide strategic input for the Interim Chair and the CDS team to consider as it develops the standards. This has provided very productive discussions of key issues that need to be addressed in the standards. For 2019-20 the Advisory Committee membership is focussed on Banking. Separate Advisory Committees will be established as additional sectors are designated by the Government.

- The CDS program comprises four working group streams:
    - **API Standards:** drafting and validating API specifications;
    - **Information Security:** defining the information security profile supporting the API specifications, and authorisation and authentication flows;
    - **Consumer Experience (CX):** testing standards, rules and providing best practice language and user experience (UX) design guidance for obtaining consents and authorisations, authentication and withdrawal of consents and authorisation; and
    - **Engineering:** focuses on demonstrating the API Standards with reference implementations and delivering usable artefacts that assist ecosystem participants develop software in conformance with the standards and rules for CDR.

- All the work streams are open for public and industry participation. Interested participants can join the groups and mailing lists at: https://consumerdatastandards.org.au/workinggroups/.

- The work streams have used a combination of GitHub updates, teleconferences, workshops, bilateral conversations and email circulation of draft outputs to engage with stakeholders in the banking, FinTech, software vendor, consumer and regulatory communities throughout the process.

- On the 12 August 2019, the Treasury Laws Amendment (Consumer Data Right) Act 2019 received Royal Assent. Andrew Stevens, the interim DSB Chair to this point, has now been appointed as the first Data Standards Chair, and CSIRO's Data61 has been appointed as the Data Standards Body.

The CDS Version History

The Interim Data Standards Body released its first overarching draft of the API specifications on 2 November 2018, which was updated with further releases issued on 20 December 2018, 31 May 2019 and 17 July 2019.

This current release on **30 September 2019** addresses a number of maintenance issues in this version 1.0.0 of the CDS that is expected to become the first version of binding standards for implementation and test in preparation for CDR operations in February 2020.

Since the standards development process commenced in July 2018 the DSB has conducted over 50 targeted consultations and delivered 5 checkpoint versions of the standards with numerous iterations between these major releases. These consultations have received hundreds of distinct items of feedback from over 100 contributors, both organisations and individuals. In addition, the DSB have connected with more than 500 individuals via regular workshops, over 200 people across Australia have been engaged in the CX research and communicated with over 900 interested parties via mailing lists and many more through blog posts and other forms of communication. This corpus of engagement represents a significant contribution from the wider CDR community to the CDS, which has been instrumental in delivering the version 1.0.0 of the CDS.

As with the earlier version of the CDS, the 30 September 2019 release is aligned to the recent rules update and the registry design changes published by ACCC. As the rules are updated and evolve, the DSB will similarly review and update the standards as required.

What's included in the September 2019 release

Since the July 2019 release, work across the different work streams have focused on the delivery of version 1.0.0 of the CDS. We are pleased to bring together:

- **The Consumer Data Standards** - the latest version of the CDS, containing API standards, Information Security profile and Customer Experience Guidelines, can be accessed via this link:
  - https://consumerdatastandardsaustralia.github.io/standards/
- **Payload validation tools to aid participants in verifying conformance:**
  - https://consumerdatastandards.org.au/workinggroups/engineering/

The above artefacts form the baseline that is expected to become the binding standards that will serve as the basis of the proposed February 2020 operations of the CDR regime.

Consideration of any issues and improvements will continue to be discussed across the CDR community forums and the feedback resulting from this consultation will be utilised to build consensus for subsequent versions of the standards.

API Standards and Information Security Profile

The API standards currently identifies the required Banking end points, Common end points and Administration end points along with the expected request and response payloads. The Information Security profile covers all of the standards required for a CDR Customer to facilitate the sharing of data as outlined in the CDR Rules.

This release builds upon the July 2019 update and incorporates changes arising from:

- Community feedback obtained via workshops and GitHub;
- Changes to accommodate the design of the CDR Register being defined by the ACCC; and
- Changes to align to the locked down version of the CDR Rules published on 2 September 2019.

The specific changes included in this iteration of the standards are articulated in Decision number 87 that can be found at the following link:

https://github.com/ConsumerDataStandardsAustralia/standards/issues/87

Consumer Experience (CX)

Since the v.0.9.5 release in July the CX Workstream has conducted a workshop on dashboards, consent management and withdrawal, proposed binding CX standards, and updated the CX Guidelines to include manage and withdrawal guidance.

Version 1.0.0 of the CX Standards and CX Guidelines are included in this September Update and incorporate feedback received from the workshop and two formal consultation drafts, consultation draft 1 and consultation draft 2.

The CX Standards can be found in Decision number 87. Standalone documents of the CX Standards and CX Guidelines can be found here: https://consumerdatastandards.org.au/cx-standards/

Engineering Work Stream

The Engineering work stream provides software tools and libraries to assist ecosystem participants build software conformant with the API Standards. The description of these artefacts is necessarily technical in nature with the source publicly available on:

https://consumerdatastandardsaustralia.github.io/engineering/artefacts/runtime/index.html

The Engineering stream continues to update these tools to be aligned with the evolving standards and is preparing to extend the testing artefacts to incorporate parameterised testing support for all the Standards end points. We are also working with ACCC to determine the best use of the engineering artefacts as the development of the Register advances and the CDR regime's testing strategy is implemented.

Next steps: getting to February 2020

With this release of CDS version 1.0.0, the team will continue to work with the banks to review the outputs of the live Product Reference and Consumer Data sets to ensure there is consistency of data released utilising these API-based standards.

The focus for the next phase will be for the DSB to work with the ACCC and ecosystem participants during the testing and assurance phase to ensure the standards are consistent and implementable for both Data Holders and Data Recipients working towards the CDR's February 2020 operational milestone.

The API and Information Security streams will trial a new operating model for ongoing feedback with a view to transitioning to an iterative, maintenance oriented, cadence for the Banking sector.

The Engineering stream will aim to further develop and identify testing tools and reference implementations for participants to aid them in building conforming platforms.

The Consumer Experience stream will, together with the ACCC, Treasury and OAIC, commence development of a Phase Three of CX work to provide continuing guidance on a number of matters identified in earlier research and by the community. This is expected to include fine-grained control, re-authorisation, intermediaries, joint accounts, cross-sector sharing, and various items considered in the CDR rules. The CX stream will hold further workshops and consultation periods on these items to facilitate collaboration and industry alignment.

The DSB will also continue to work with the Energy sector in order to play our role in manifesting a safe and secure mechanism for consumers to express their right to their data.

Providing feedback on the September 2019 release

As the 30 September 2019 release of the CDS are aligned with the latest, lock down versions of ACCC's rules and are expected to become binding standards for CDR participants, the DSB will be commencing the pilot operation of the Operating Model.

This will allow feedback to continue to be received through GitHub and the familiar process of raising issues that will be prioritised and form part of a regular eight-week release cadence as determined through consultation on Noting Paper 50 found at the following link:

https://github.com/ConsumerDataStandardsAustralia/standards/issues/50

This trial has been scoped to include feedback on the API standards and Information Security profile. Feedback for the CX and Engineering streams will maintain their existing feedback mechanisms.

In light of this, the community is invited to provide feedback as follows:

- **Comments and queries on the API standards or Information Security profile:** Raise a new issue via the new maintenance issue tracker on GitHub that can be found at:

  https://github.com/ConsumerDataStandardsAustralia/standards-maintenance/issues

- **Comments and queries on the Engineering artefacts:** feedback can be provided through the existing Engineering GitHub Issues page noted here:

  https://github.com/ConsumerDataStandardsAustralia/engineering/issues/52

- **Comments and queries on the CX Standards, Guidelines, and research:** feedback and recommendations can be sent to the CDR email address: cdr-data61@csiro.au

Where participants believe they have sensitive information to convey we will consider those discussions and give guidance on our preferred disclosure approach prior to meeting to discuss such issues. To discuss, please email us at the CDR email address: cdr-data61@csiro.au