

Data Standards Body

Technical and CX Working Groups

Noting Paper 346 – Standards Assessment Framework

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Context

The Consumer Data Right is intended to be a cross-economy digital reform focused on empowering consumers to utilise their data in accessing services, thereby encouraging competition and innovation.

Since banking data was first introduced in July 2019, the CDR has seen expansion across the banking and energy sectors. The CDR has recently seen growth in the participation of data recipients with more use cases offered to market for consumers. This has coincided with the maturing of data aggregator platform offerings and a shift away from screen scraping ([Ćúća 2022](#), [Thrassis 2024](#)). The completion of the phased rollout across banking, along with changes to accommodate Data Recipient models (such as CDR Representatives) and business consumers (business consumer disclosure consents) have, amongst other things, assisted this growth.

This ecosystem growth has seen a broadening and deepening of involved CDR participants and stakeholders, and thus an increasing diversity of views. More recently, feedback has diverged on topics regarding consumer adoption rates, expansion rates, business innovation levels, and implementation costs of the CDR. We understand that for the regulated community, particularly mandated participants, implementation of the CDR has come with a level of investment costs, and more recently, concerns regarding the level of necessary change.

Progressing the CDR in future—to new use cases and across the wider economy—necessarily includes a focus on improving data quality to deepen participation in existing sectors, whilst strengthening cyber security. As with any digital initiative, an element of change is necessary to:

- iterate and ensure new and novel initiatives are fit for purpose; and
- remain in line with the national and global operating environment.

The CDR's evolution and the need for some ongoing level of change, coupled with an increasing number and breadth of stakeholder views, makes it critical that stakeholder input is channelled in consistent ways and that changes are justified and made visible. Any meaningful changes to improve and grow the CDR to achieve its objective of becoming a cross-sectoral digital reform need to balance views across consumers, data recipients and data holders in a process that is visible, value-oriented, practical and objective.

This paper supports the Data Standards Chair's (the Chair) intention to further refine current change management consultation practices. Outlined in '[Noting Paper 345 - Data Standards Body Capability, Consultation Processes and Operating Model](#)' the DSB's processes currently

state that “...[change] is defined and understood, prioritised, and a hypothesis for the options and recommendations for change to standards is articulated...”¹.

Recent Data Standards Advisory Committee discussions² have supported the need to further document and formalise this process. The Chair is therefore proposing consultation on a draft Standards Assessment Framework (the Framework), which considers key stakeholder value propositions and concerns, measured against the Government’s priorities and CDR’s objectives. This Framework intends to improve the DSB’s practices of open and transparent consultation to help communicate more effectively to a wider ecosystem base. Its application will further help provide visibility and clarity of:

- The justification for change proposals;
- The evidence and consultation insights for proposed standards; and
- The Chair’s decision making.

Treasury and the DSB are working towards greater alignment of the rules and standards development processes to enable a more holistic approach to be taken when assessing the costs and benefits of framework changes.

The Chair is inviting collaboration from the CDR community to ensure the Framework captures consultation input that is practical, and to engage the community further on the balancing of ecosystem views. The DSB will host two workshops to obtain CDR participant feedback on key inputs when considering consumer and economic value, and implementation feasibility.

CDR Objectives and Government Priorities

A fundamental aspect of assessing the rationale and value proposition of a proposed change is alignment to both the Government’s priorities of the day, and to the core principles of the CDR. For example, if the phasing out of screen scraping were prioritised, it is expected that the criteria would be used to assess how well a proposal better positions the CDR as a viable alternative to screen scraping.

In contrast to Government priorities of the day, which may change over time, the CDR’s core objectives have remained consistent with the object in the *Competition and Consumer Act 2010* and the aims and purposes described in the explanatory memorandum to the CDR Bill³. We can summarise the core objectives of the CDR as being to:

1. Empower consumers to safely, securely and conveniently grant third party access;
2. Enhance consumer outcomes efficiently and fairly;
3. Facilitate choice, competition and innovation.

The Chair is proposing the Framework operationalise these objectives in a way that is coherent and measurable and will enable visibility of where proposals support progress against these core objectives.

¹ <https://github.com/ConsumerDataStandardsAustralia/standards/issues/345> Page 11

² Data Standards Advisory Committee minutes
<https://consumerdatastandards.gov.au/2024/03/minutes-14-feb-2024>

³ See *Competition and Consumer Act 2010*, s 56AA, and [Explanatory Memorandum to Treasury Laws Amendment \(Consumer Data Right\) Bill 2019](#).

Draft Standards Assessment Framework

The draft Framework proposes four stages which are intended to apply across all sources of change to the Consumer Data Standards. Across these four stages, a set of questions would be applied which facilitate the rationalisation of a proposal, its feasibility and its value, in a standardised way across the CDR ecosystem.



Figure 1: Through each stage, the Framework seeks to answer key design questions and present the considerations for change, or why no change is made.

Each stage is designed to elicit information that has increasing relevance to the proposal and a balanced decision of the Chair on whether the proposal progresses, or not. In some situations, the details required for all stages could be relatively simple to collect simultaneously. However, in others it may require more than one round of community consultation.

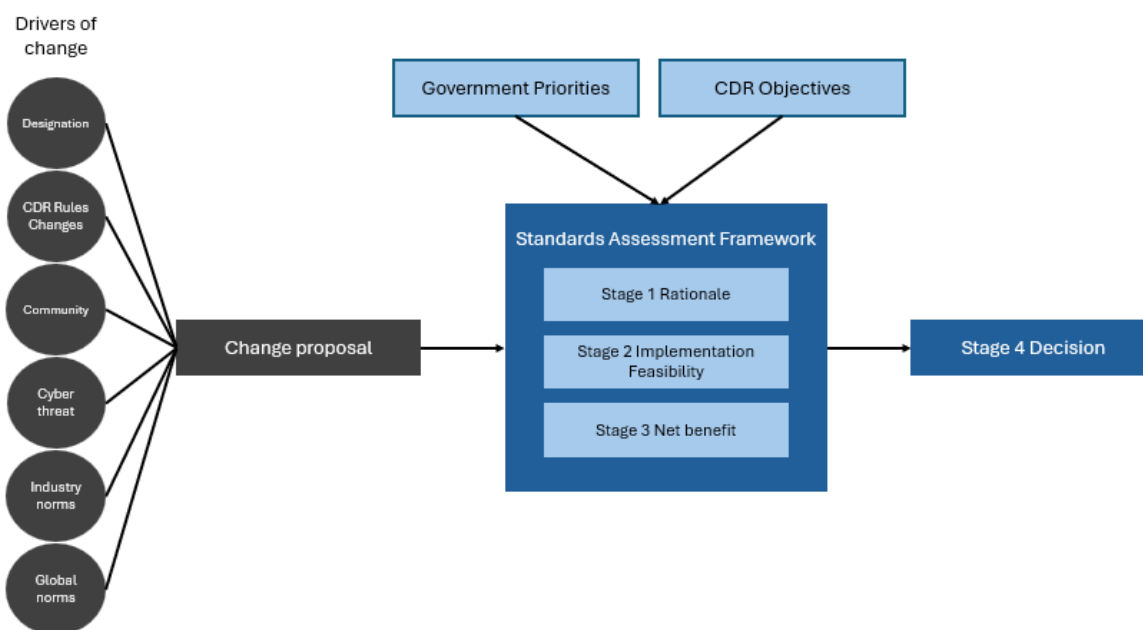


Figure 2: Applying the framework to new changes considers a set of assessment criteria which are evaluated against the government's drivers (priorities) and the CDR's principle-based outcomes (objectives).

Stage 1 – Rationale

To formalise current practice, during the Rationale stage⁴ the DSB would consider the merits of change across a number of core factors, including:

- if and how the proposal addresses a defined requirement;
- what the proposed objective and outcomes are, aligned to fundamental CDR objectives and current Government priorities;
- scale of the impact; and
- whether a standards change, as opposed to other type of change within the CDR, provides greatest value.

Assessing proposals for change may involve different forms of activity depending on the type, size and driver of the change including workshops, experiments, consumer experience research, online consultations and bilateral discussions with stakeholders. Drawing input from these sources, the DSB then assesses the merit of the proposition and considers if and how the proposal can proceed to the next Stage.

Stage 2 – Implementation Feasibility

The Implementation Feasibility stage focuses on broad consultation regarding practical implementation considerations. Continuing to work with the community, this stage aims to gather feedback that supports a decision on proceeding with the change, as well as the most appropriate timeframe for the proposal to be finalised and implemented.

Community input on particular questions could capture input on various types and drivers of costs associated with potential changes, including:

- Length of time the change may take;
- Technology limitations that may exist to implementing the change;
- Future expected maintenance activities of the change;
- Resource demands of the change; and
- Risks associated with the change.

These implementation factors will again need to be considered in light of their impact on CDR objectives and Government priorities. Broader context is taken into consideration, particularly around CDR Future Dated Obligations (set out in the Rules or [Standards Obligation Dates Schedule](#)), sector specific factors where they exist, and time required to develop and implement the proposal.

Input on implementation considerations would typically be achieved through the use of workshops, experiments, Noting Papers, Design Papers, Decision Proposals, or a combination of these mechanisms.

⁴ With regard to community-driven changes, currently this work is undertaken in the Change Initiation Phase described in [Noting Paper 345](#).

Stage 3 – Net Benefit

Determining the net benefit of a proposal is an assessment of the rationale against the implementation feasibility of change. This presents an opportunity to both inform a decision on whether or not to proceed with a change or set of changes, but also to support a prioritisation of changes and the related program of work, in light of weighing up the benefits against implementation practicalities. It is useful at this stage to articulate and validate assumptions that may have informed the earlier stages of discovery.

Stage 4 – Decision

In this stage, advice provided by the CDR community at all stages will be relied upon to determine final recommendations to the Chair on proceeding with a standards change, particularly regarding implementation timing and standard type. Once approved, the final decision, published as a Decision Paper, incorporates an executive summary of the assessment and consultation process and provides clarity on how consultation feedback was considered.

Workshops

The Data Standards Body will conduct two in-person workshops to seek input on the Framework. The workshops will focus on:

- what questions organisations want the DSB to ask about a given change or proposal;
- data, measures and criteria that could be used to inform its assessment;
- mechanisms to evaluate a proposal later if it does not proceed following initial assessment; and
- views on the stakeholders and forms of engagement best placed to provide input to any assessment of changes.

Sydney Workshop 6 May 2024

Venue: Data 61, Level 4, 13 Garden Street, Eveleigh, NSW

Time: 1:00 - 5:00PM

Space is limited. For full details refer to the [invite](#) and **Sign Up** to attend.

Melbourne Workshop 14 May 2024

Venue: ACCC Offices, Level 17, 2 Lonsdale Street, Melbourne, Vic

Time: 1:00 - 5:00PM

Space is limited. For full details refer to the [invite](#) and **Sign Up** to attend.

Bibliography

Albanese, Anthony [A future made in Australia](#), 11 April 2024

Australian Government, [Budget 2023-24](#), 9 May 2023

Australian Government, [Government statement in response to the Statutory Review of the Consumer Data Right](#), 7 June 2023

Australian Public Service Commission, [Priorities of the Australian Government](#), 26 September 2023

Chalmers, Dr Jim, [Opinion piece: Cost-of-living measures are Labor's main priority](#), 18 October 2023

Consumer Data Standards, [Data Standards Advisory Committee minutes](#)

Consumer Data Standards, [Standards Obligation Dates Schedule](#)

Ćuća, Damir, [The future is now. Commit to Open Banking: A message from Basiq's CEO](#), 8 December 2022

Data Standards Body, [Noting Paper 345 - Data Standards Body Capability, Consultation Processes and Operating Model](#), 22 March 2024 (republication of 2018-2023 papers)

Deloitte, [Consumer Data Revolution: Empowering Australia's Future](#), March 2024

[Explanatory memoranda](#), Treasury Laws Amendment (Consumer Data Right) Bill 2019

[Express lending - new data rules give borrowing an overhaul](#), *The Australian Financial Review*, 4 April 2024, sponsored by Tiimely

Eyers, James, [Westpac taps open banking regime to speed up 10-minute mortgages](#), *The Australian Financial Review*, 24 May 2023

Farrell, Scott, [Inquiry into Future Directions for the Consumer Data Right - Final Report](#), 23 December 2020

Federal Register of Legislation, [Competition and Consumer Act 2010](#)

[Home Loan Pricing Spotlight](#), p7, *Sherlok*, April 2024

Jones, Stephen, [Address to the Committee for Economic Development of Australia](#), 7 June 2023

Kavanagh, John, [Westpac launches tech overhaul](#), *Banking Daily*, 28 March 2024

Thrassis, Tony '[Data quality where it matters: Taking a use case based approach to data quality comparison and improvement](#)', April 2024

Xiong, Dr Zhitao [The Open Banking Advantage: A Data-Backed Comparison of Data Quality with Screen Scraping](#)

All references were accessed April 2024.