



24 August 2021

Data Standards Body

By: GitHub Post [CDR NP207](#)

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

Overarching recommendation

Thank you for the opportunity to provide input to Noting Paper 207 (NP 207). Specific recommendations to issues raised in NP 207 follow.

A key recommendation of the ABA is for the information security requirements, which are currently required for Accredited Data Recipients, to be extended to all other recipients of banking data.

Rationale

The draft Rules 3.0 proposed ‘daisy chaining’ of banking data enables consumers’ banking data to travel from the most secure setting from the Data Holder to the Accredited Data Recipient, to a data sharing arrangement involving no requirements for security.

This is problematic for the following reasons:

- No security for banking data will make that data more susceptible to successful hacking activity.
- Consumers expect a high level of security of their banking data.
- Banks are unable to fully comply with their regulatory obligations to have oversight of the security of banking data.

The ABA recommends this response to NP 207 be read in conjunction with the ABA submission to the Department of Treasury’s draft Rules 3.0 consultation.

Response to issues

NP 207 Reference	ABA Response
<p>Table 1: Sponsored Accreditation</p> <p>Issue #3 Consumer Data Standards (Technical)</p> <p>‘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.</p>	<p>It is the ABA’s view that the need for prescription of data standards should be proactively determined by the DSB Chair with a view to keeping the ecosystem safe and secure.</p> <p>The role of the Rules in directing which standards should be developed appears to be an extension of the intention of the Rules and an overlap with the function of the DSB and the responsibility of the DSB Chair.</p> <p>The prescription of scope of standards within the Rules may be problematic because:</p> <ul style="list-style-type: none"> • the review process of the CDR Rules lacks the agility to respond to and keep abreast of developments in API standards, notably security standards. • the role of standards setting is for the DSB and not the Rules makers (in this case Treasury). <p>The ABA recommends DSB undertake its own risk assessment in respect to the appropriate security prescription.</p>



NP 207 Reference	ABA Response
<p>Table 1: Sponsored Accreditation</p> <p>Issue #3 Consumer Data Standards (Technical)</p> <p>‘The DSB has not sought to impose technical standards on the transfer of data between accredited persons.’</p>	<p>The ABA recommends that the DSB introduce infosec requirements for banking data transfer between Sponsors and Affiliates, which are as strong as the requirements between Data Holders and Accredited Data Recipients.</p>
<p>Table 2: CDR Representative Model</p> <p>Issue #8 Consumer Data Standards (Technical)</p> <p>‘The DSB has not sought to impose technical standards on the transfer of data between accredited persons.’</p>	<p>The ABA recommends that the DSB introduce infosec requirements for banking data transfer between Representatives and Principals (ADRs), which are as strong as the requirements between Data Holders and Accredited Data Recipients.</p>
<p>Table 3: Unaccredited OSPs</p> <p>Issue #12 Consumer Data Standards (Technical)</p> <p>‘Where the OSP collects data on behalf of the principal, it continues to do so in accordance with the existing technical standards.’</p>	<p>The ABA recommends that the DSB introduce infosec requirements for banking data transfer between Principals and Outsourced Service Provider (unaccredited), which are as strong as the requirements between Data Holders and Accredited Data Recipients.</p>
<p>Table 4: Trusted Adviser</p> <p>Issue#20 Consumer Data Standards (Technical)</p> <p>‘Disclosure of data to a trusted advisor is done so at the discretion of the ADR through services offered by the ADR.’</p>	<p>The ABA recommends that the DSB introduce infosec requirements for banking data transfer between Trusted Advisers and Accredited Data Recipients, which are as strong as the requirements between Data Holders and Accredited Data Recipients.</p>
<p>Table 5: Insight Disclosure</p> <p>Issue #29 Consider Data Standards (Technical)</p> <p>‘The technical standards do not currently control the transfer of data between an accredited person to other persons.’</p>	<p>The ABA recommends that the DSB introduce technical standards for insights incorporating banking. This includes a prescription of infosec standards because insights can be as sensitive of the underlying data.</p>
<p>Table 6: Joint Accounts</p> <p>Issue #38 Consumer Data Standards (CX)</p> <p>No additional CX Data Standards are anticipated for this item.</p>	<p>The ABA notes that the DOMS is significantly different to the JAMS.</p> <p>The ACCC provided detailed guidance on the implementation of JAMS under different scenarios. A similar guidance will be required for DOMS.</p> <p>The ABA recommends:</p> <ul style="list-style-type: none"> • scenario based guidance for the implementation of DOMS (similar to that provided by the ACCC for the implementation of JAMS) • the development of CX standards for DOMS to clarify the customer experience. <p>We note that draft Rules 3.0 provided for a 1 April compliance date for Data Holders to provide DOMS. The ABA has recommended due to the complexity of the technical implementation considerations and customer transition, a compliance date of 1 September 2022.</p>