



Consumer
Data Right

Consumer Data Right

Data Standards Body | CX Research

2021 Q4 | TA and Insight disclosure

Nov 2021



Research focus

We are here

October

November

December

January

February

Research Prep

Research
Rounds 1 & 2

Analysis & Synthesis

Artefact/Guideline Creation, Refinement & Finalisation

Standards Consultation

Finalise
standards

Goals, approach & hypothesis

Goals

Provide intuitive, informed, trustworthy insight and TA disclosure experiences.

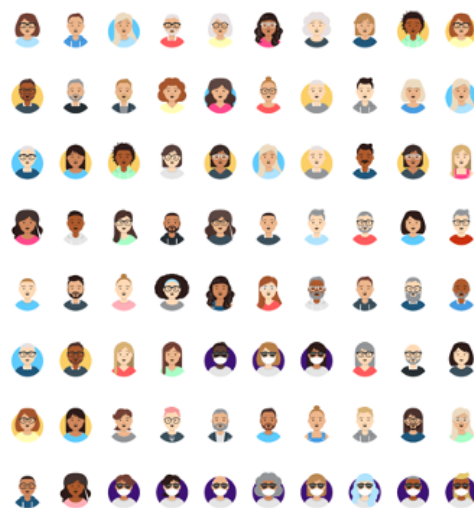
Inform the development of requirements for describing insights and what they will reveal.

To support this, we conducted qualitative research with consumers on insight disclosure consent to inform new/amended standards for Insights and Trusted Advisor Disclosure Consents.

Approach

Two rounds of in-depth, one-on-one interviews with 14 consumer participants using a clickable prototype.

Participants were given the scenario of applying for a new rental property, where they offered the option to consent to sharing data insights from their bank with the real estate agent in an effort to bypass a number of manual verifications.



Goals, approach & hypothesis

Hypothesis

If we articulate the below details in relation to insights, data clusters, and data handling statements, then we can support informed insight disclosure consents:

What the insight will tell the non-AP, with a realistic and easy to understand example

What regulations and protections do or do not apply to disclosed data

Where insights can be reviewed, accessed, and ongoing disclosure withdrawn

When the insight will be generated, and the period the insight will refer to (which may be implicit)

Why the insight will be generated, if known

How the insight will be generated, e.g. the origin(s) and source(s) of the data used to generate the insight

If we use a realistic rental application scenario, then we will be able to determine how intuitive, informed, and trustworthy this concept is.

Key objectives

1) Understand consumer comprehension of insights based on the specified attributes

2) Understand how to meaningfully describe what an insight is and what it may reveal

3) Understand consumer needs and expectations to support informed insight/TA disclosures

4) Assess consumer understanding of which regulations and protections do or do not apply to disclosed data

5) Assess levels of interaction with content based on the proposed design pattern



What kind of information did you share in this scenario, and why?



How would you describe an 'insight' based on what we just went through?



What other information would you expect or need to feel adequately informed about what you are sharing?



What regulation or protections apply to your data after it has been disclosed?



How would you go about reviewing the insights you've just shared?

Overall

Two rounds of research were conducted articulating the details of hypothesis 1 and 2 in relation to insights, data clusters, and data handling statements.

Concepts tested in both rounds **supported informed insight disclosure consent, as well as data risks, controls, and recourse.**

Details surrounding how intuitive, informed, and trustworthy participants found the rental application scenario are as follows.

Research cohort

Round 1 (11 Nov - 16 Nov, 2022)
6 total participants, all new to CDR

Round 2 (24 Nov - 30 Nov, 2022)
8 total participants, 2 were new to CDR

Hypothesis 1 - Insight descriptions

What the insight will tell the non-AP, with a realistic and easy to understand example

- Most participants understood or described an insight as a "summary" of their information, valuing that insights reflect broad buckets of data.
- The "straight forward" and "basically" worded examples were well received.
- Many requested to see their generated insights prior to disclosure to the non-AP.
- Details surrounding what will not be shared increased comfort in the process.

When the insight will be generated, and the period the insight will refer to (which may be implicit)

- The access period (of 60 days) was generally understood.
- It was mostly clear that insights are generated using data from a specified time period (last 6 months).
- Some confusion existed regarding the format of the insights when they're generated (computer/analyst generated, PDF, etc.)
- Requesting permission to disclose insights for future applications was valued.
- A question was raised around when and how quickly insights would be generated, as timing might impact their application in this scenario.

Why the insight will be generated, if known

- All participants understood insights were being disclosed to non-APs for a particular purpose and on a once-off basis only.

How the insight will be generated, e.g. the origin(s) and source(s) of the data used to generate the insight

- Participants weren't entirely clear WHO was generating the insights and HOW they were generated (some cited CDR for example), however the HOW was clearer in Round 2 when 'computer generated' was added as a descriptor.
- Further clarity on who can access insights and where they'd be stored was requested up front.
- It was generally understood that insights are conclusions drawn based on personal data used to match/verify details, and that specific data access for this is required. Transaction data access raised the most discomfort.
- A feeling of control was referenced with the ability to choose insights and see the explicit data required.
- There were concerns insights wouldn't accurately reflect the reality of all situations.

Hypothesis 2 - Disclosure notifications

What regulations and protections do or do not apply to disclosed data

- Overall information about ADR data handling/deletion was understood and valued.
- It was generally understood by the end of the sessions that ADRs and non-APs are bound to different regulations, however for some, non-APs falling outside of CDR regulations was disliked and raised concerns. There was some comfort in insights not being seen to contain sensitive information, especially in comparison to the current manual methods.
- Many appreciated the non-AP privacy policy and some requested a mapping of the differences between ADR/non-AP regulations.
- External links ending in '.gov.au' provided some comfort and credibility.

Where insights can be reviewed and accessed

- There was a general preference to preview their own insights before submitting them to the non-AP, for greater transparency, comfort, and trust in the overall process.
- In-flow messages regarding where insights and data could be reviewed were generally recalled, but some requested a single, centralised location for CDR related reviews.

Where to go for help if there's a problem

- While there was limited interaction with the link, there was general recollection of the complaint portal, which some said increased comfort levels in the process.
- Some expected CDR would also be able to be contacted with complaints.
- It was suggested that complaint information would be included in the CDR receipt.

Key 7.5A Rules | Insights and TAs

Insight and trusted adviser disclosure consents are not permitted until the earlier of the following:

- 1 February 2022;
- the day the Data Standards Chair makes the data standard about the matters referred to in subrule 8.11(1A) and 8.11(1)(c)(iv)

An insight disclosure consent is not permitted if the CDR insight includes or reveals sensitive information within the meaning of the Privacy Act 1988.

Key 1.10A Rules | Insights

An insight disclosure consent in relation to particular CDR data of a CDR consumer held by an accredited data recipient is a consent given by the CDR consumer under these rules that:

- authorises the accredited data recipient to disclose the CDR data to a specified person for one or more of the following purposes:
 - verifying the consumer's identity;
 - verifying the consumer's account balance;
 - verifying the details of credits to or debits from the consumer's accounts; but
- where the CDR data relates to more than one transaction—does not authorise the accredited data recipient to disclose an amount or date in relation to any individual transaction.

Key 4.10 and 4.11 Rules | Consent

- The consumer must actively select or otherwise clearly indicate the types of CDR data to which the consent applies
- The ADR must allow the consumer to select the person to whom the CDR may be disclosed
- The ADR must make clear to the CDR consumer what the CDR insight would reveal or describe

Key 7.9 Rules | Privacy Safeguard 10

- An ADR that discloses an insight must update the consumer dashboard to indicate:
 - what CDR data was disclosed; and
 - when the CDR data was disclosed; and
 - the person to whom it was disclosed

Key 1.10C Rules | Trusted Advisers

An accredited person may invite a CDR consumer to nominate one or more persons as trusted advisers of the CDR consumer for the purposes of this rule.

A trusted adviser must belong to one of the following classes:

- qualified accountants within the meaning of the Corporations Act 2001;
- persons who are admitted to the legal profession (however described) and hold a current practising certificate under a law of a State or Territory that regulates the legal profession;
- registered tax agents, BAS agents and tax (financial) advisers within the meaning of the Tax Agent Services Act 2009;
- financial counselling agencies within the meaning of the ASIC Corporations (Financial Counselling Agencies) Instrument 2017/792;
- relevant providers within the meaning of the Corporations Act 2001 other than:
 - provisional relevant providers under section 910A of that Act; and (ii) limited-service time-sharing advisers under section 910A of that Act;
- mortgage brokers within the meaning of the National Consumer Credit Protection Act 2009.

Key 8.11 Rules | Data Standards

- CX Standards for disclosure of CDR data to APs, trusted advisers, and for CDR insights
- CX Standards must specify how ADRs can meet the requirement to explain what a CDR insight and would reveal or describe (Rule 4.11(3)(ca))
- Requirements to inform consumers that their data will leave the CDR system when disclosed

Key 1.14 Rules | ADR Dashboard

- For an insight disclosure consent — dashboards must provide a description of the CDR insight and to whom it was disclosed
- Dashboards must include information about how to request further records as per Rule 9.5, including about CDR insights

Insights disclosure

About

This is an example of the insight disclosure consent flow, in the context of a property rental application.

NB: This board contains artefacts used in the second DP222 consultation. The previous artefacts for the initial iteration of DP222 are in the below v1 flow.

Scenario

1. Consumer wants to rent a property from (non-AP).
2. (ADR) offers a service to help (non-AP):
 - verify a consumer's identity;
 - verify a consumer's account balance;
 - verify the details of credits or debits from a consumer's accounts (e.g. verifying a consumer's income).
3. With the consumer's consent and through the CDR, the (ADR) discloses relevant details from their bank (BH) to the real estate agent (non-AP) using CDR insights.

NB: The CX research used real-world ADR and non-APs.

Key relating to DP222

Insight Descriptions

- Insight Descriptions, Option 1 - Insight Descriptions
- Insight Descriptions, Option 2 - Types of Insight Descriptions
- Insight Descriptions, Option 3 - Types of Insight
- Insight Descriptions, Option 4 - Insight Readability
- Insight Descriptions, Option 5 - Insight Insights
- Insight Descriptions, Option 6 - Insight Identification

Disclosure Notifications

- Disclosure Notifications, Option 1 - CDR Notifications
- Disclosure Notifications, Option 2 - Non-AP Handling
- Disclosure Notifications, Option 3 - Non-AP - Consent Requirements
- Disclosure Notifications, Option 4 - Non-AP - Consent Requirements - Non-AP Consent
- Disclosure Notifications, Option 5 - Non-AP Handling - Summary
- Disclosure Notifications, Option 6 - Consent Handling
- Disclosure Notifications, Option 7 - Readability
- Disclosure Notifications, Option 8 - Readability - Read

