![Australian Government | data standards body]

Consumer Data Right

Data Standards Advisory Committee (DSAC)
Minutes of the Meeting

Date: Wednesday 12 March 2025

Location: Held remotely, via MS Teams

Time: 10:00 to 12:00

Meeting: Committee Meeting # 70

Attendees

Committee Members

Dr Ian Oppermann, Data Standards Chair	Peter Leonard, Data Synergies (Privacy)
Alysia Abeyratne, NAB (Privacy)	Selena Liu, Energy Australia
Sam Bendat, Solving Zero	Drew MacRae, Financial Rights Legal Centre (Consumer)
Jill Berry, Adatree	
James Bligh, Product Cloud	Jodi Ross, Tiimely (left 11:00am)
Jessica Booth, Biza	Lisa Schutz, Verifier
Brenton Charnley, Mastercard	Stuart Stoyan, Fintech Advisor (joined 11:10)
Ruth Hatherley, Moneycatcha	Zipporah Szalay, ANZ
Dan Jovevski, WeMoney	David Taylor, Westpac
Gavin Leon, CBA	Mark Wallis, Skript

Observers

Nils Berge, DSB	Hemang Rathod, DSB
RT Hanson, DSB	Mark Verstege, DSB
Terri McLachlan, DSB	Sarah Croxall, ACCC
Michael Palmyre, DSB	Claire McKay, TSY

Apologies

Naomi Gilbert, DSB	Steven Meek, Pepper Money
Steve Kemp, SISS Data Services	Tony Thrassis, Frollo

Chair Introduction

Dr Ian Oppermann introduced himself as the new Data Standards Chair (Chair), replacing Mr Andrew Stevens, and acknowledged the traditional custodians of the land and paid respect to elder's past, present and emerging.

The Chair outlined the agenda for the meeting, which included reporting on recent activities, an opportunity to meet the participants, and discussing the future direction of the committee. They emphasised that changes would be coming due to the new remit combining Consumer Data Right (CDR) and Digital Identity (Digital ID).

The Chair shared his extensive background, including his role as Chief Data Scientist for NSW Government, his work with The Hon Victor Dominello, and his efforts to bring a different approach to data and digital in NSW. They also mentioned his previous roles in telecommunications, financial markets, university sector and startups.

The Chair invited members and observers to introduce themselves. Each participant provided a summary of their role.

Minutes

The Chair discussed the importance of meeting minutes and action items, and encouraged members to provide comments and feedback.

The Chair noted that there was no feedback from DSAC members from the 12 February 2025 meeting and that the minutes were formally accepted.

Opening Remarks

The Chair outlined his vision for the future, focusing on the integration of CDR and Digital ID. He mentioned his intention was to create a window of opportunity to pause and reset, allowing for a reimagining of the future and explore synergies between the two domains while continuing the current program of work. He acknowledged the importance of driving uptake and ensuring that the current progress continues while planning for future changes.

The Chair plans to run a series of ideation sessions to explore the future vision, involving various stakeholders to develop a coherent picture of the future. He aims to create a framework to think about the future and develop a program logic for achieving long-term goals.

The Chair acknowledged the challenges and opportunities in integrating CDR and Digital ID and highlighted the importance of privacy, consent, and cybersecurity in this integration with the potential for significant benefits if done correctly.

The Chair emphasised the importance of engaging with various stakeholders, including government and industry, to develop a coherent and joined-up perspective on the future of CDR and Digital ID. He plans to involve stakeholders in the ideation sessions to ensure a robust and inclusive approach.

One member expressed excitement about the vision of bringing Digital ID and CDR together, which aligns with their company's goal of empowering consumers to do more than just share data and being part of the ideation sessions which is a great opportunity.

One member appreciated the focus on consumers and the safe and responsible data sharing inherent in joining Digital ID and CDR. They sought clarification on whether the discussion would remain within the scope of CDR and how Digital ID solutions might improve the safety or other aspects of the CDR regime.

The Chair clarified that currently there's isn't an equivalent group for Digital ID. They emphasised his effort to avoid bifurcation and to look at Digital ID and CDR as part of the same entity, aiming for a unified approach. They mentioned that changes are likely to come, reflecting his responsibility for both Digital ID and CDR, and he aims to ensure a coherent perspective that encompasses both areas.

One member expressed excitement and support for bringing Digital ID and CDR together. They highlighted that CDR is fundamentally a consent regime, focusing on strong consumer consent for their data, which aligns well with the principles of Digital ID.

The member emphasised the importance of individual sovereign control over identity, rather than it being managed by services on their behalf. They pointed out the risks associated with "honeypots" of identity data and suggested that verifiable credentials could help confirm identity at the point of need, reducing the need for widespread databases.

One member expressed strong enthusiasm for reimagining the integration of Digital ID and CDR, noting that she has long argued for their convergence. They highlighted the challenges posed by split accountabilities across policy, legislation, Rules and Data Standards, which complicate the implementation of changes. They also pointed out the absence of an operating co-accountable entity for the outcomes of the CDR, which she sees as a structural challenge.

One member expressed concerns about the term "reset" being used to stop progress. They emphasised that there are real problems currently stifling CDR uptake that need to be addressed highlighting issues such as nominated representatives (rep) and data quality. They stressed the importance of continuing to solve these issues to increase the uptake of CDR usage.

The Chair acknowledged the importance of continuing delivery and uptake, emphasising that these are essential and should not be halted.

One member expressed strong support for the idea of integrating Digital ID and CDR, noting that there are clear synergies between the two. He emphasised that now is the right time to rethink and reimagine both Digital ID and CDR so they can coexist effectively.

The member also pointed out that the current foundations of the CDR are not fit for purpose to directly plug in Digital ID and allow both to thrive and agreed with the need for holistic thinking that goes beyond just data standards and includes policy, rules and standards settings.

One member emphasised the need for a balanced view to create a sustainable ecosystem, acknowledging the passion and long-term involvement of the group in making CDR work. He suggested focusing on core objectives, the importance of trust and functionality and the need for improvement on items like data quality and authentication to improve consumer uptake and trust in the ecosystem.

The member also expressed support for the idea of a reset to focus on large items or KPIs that will drive significant improvements in consumer uptake.

One member expressed concerns about the term "reset," noting that the CDR regime has effectively been in a reset for nearly two years while focusing on what needed to be done and how to uplift things. During that period, there had been a pause on operational improvements, which had been problematic for participants who had made risky investments relying on CDR for their business plans. He suggested the need for a two-speed approach to operationalise and improve the regime while also considering the holistic direction.

The Chair mentioned the Smartification program in the context of ISO and IEC standards, which aims to deliver standards as a service rather than as PDF documents for human beings to read. The program focuses on delivering standards in real-time with the consumer being an algorithm, reflecting the need for standards to keep up with the fast pace of industry changes. This program has been running for six years, and it is only this year that real pilot projects are set to run across multiple national bodies.

One member reflected on the original vision of CDR, which was much bolder than where it currently stands. He highlighted the need to rethink how the priorities can be achieved, considering that the data held in the banking and energy sectors alone cannot meet those priorities. He suggested focusing on key consumer journeys that align with the priorities and identifying where the data lives. These logical extension points for CDR could unlock greater value than going deeper into the sectors already participating.

4

One member expressed encouragement and welcomed the Chairs comments, appreciating the fresh perspective he brings to the table.

The Chair acknowledged the natural conservatism that exists when dealing with Commonwealth agencies, like his experience with state agencies over the past decade. Despite this conservatism, he expressed optimism that with good will and collaboration, it is possible to change the world. He reiterated his genuine belief in the vision of the CDR and the incredible opportunity it presents, especially when combined with Digital ID.

Action items

It was noted that the DSB were continuing to progress the threat assessment work, and they would present to the DSAC at a future meeting in 2025.

Forward Agenda

It was noted that planning for 2025 is underway, and an updated forward agenda will be included in future monthly meeting papers.

Working Group Update

A summary of the Working Groups was provided and these DSAC Papers were taken as read.

Technical Working Group Update

An update was provided on the Technical Working Group by Mark Verstege.

The DSB released a patch release to version 1.33 of the Data Standards to improve documentation fix typographical errors and to enhance the API specification without changing the actual content.

The DSB is finalising the release of version 1.34, which includes updates for banking Data Standards (Decision 338) and support for energy retailers to share historical energy usage data (Decision 361).

The DSB noted that feedback on the authentication uplift consultation paper was being consolidated, with the first decision proposal focusing on redirect to app being published soon.

The DSB noted that they were working on the technical standards impacts of the V8 Rules for Non-Bank Lending (NBL). A survey would be published to gather further information regarding product origination and white labeling practices in the NBL sector.

One member inquired whether the candidate standards for NBL, which had undergone substantial consultation previously, would see significant changes now that the Rules have been set. They expressed concern about the potential impact on organisations gearing up for implementation.

The DSB indicated that the final Rules for NBL are very similar to the original draft Rules that were shared, and therefore they don't expect any substantial changes to the candidate Data Standards based on the final Rules.

One member asked about data latency issues for mortgages, specifically in relation to core banking platforms and the challenges around accessing data.

The DSB clarified that the change is specific to the energy sector, allowing energy retailers to share historical energy usage data up to the last customer change date (LCCD). This change does not apply to mortgages.

One member inquired about the timing for the release of the authentication Data Standards paper and the draft Data Standards for redirect to app. They asked if these would be released together and the expected time frame for feedback.

The DSB indicated that the original plan was to release both together. The DSB mentioned that the paper would have a two-week timeframe for feedback, whilst the Draft Standards would require a 28-day consultation period as per legislative requirements.

One member suggested that there may be an opportunity to simplify the Data Standards for NBL by taking learnings from the banking sector, particularly focusing on fields necessary to maximise utility for priority use cases. They asked if there had been any thoughts on what the new approach might mean for Decision 338 and Decision 361, as well as the Data Standards to come for the most recent rules package.

The Chair acknowledged that Decision 338 had been a hot topic of conversation and that he is currently checking with some process issues related to it. He expressed the view that there is real value associated with Decision 338 but suggested that a delay may be appropriate. However, he would not commit to anything immediately as he needs to work through some process steps first.

One member noted a significant change between the draft and the public Rules regarding complex accounts, specifically that complex accounts have no set dates for inclusion in the CDR and this affects many use cases, particularly for small businesses. They inquired about the plan for including complex accounts back into the CDR.

Treasury explained that the absence of dates for complex accounts in the CDR was due to the need to finalise the nominated representative (rep) process. They did not want providers to start

6

building for complex accounts only to have to change the process later. They are committed to resolving this issue and expect to address it within the year.

One member raised a concern about the recent Rule's changes, specifically the reduction in scope for banking, such as the removal of foreign currency accounts from the CDR. They questioned what would happen to foreign currency accounts that are already consented to and accessed through CDR.

Treasury responded that current consents would continue to operate until they expire. They also mentioned that foreign currency accounts have been moved to the category of voluntary data, allowing DHs to decide whether to continue sharing this data voluntarily. They noted that understanding how voluntary data plays out in the CDR system is important, and this situation will serve as an interesting test case for voluntary data sharing. The same member highlighted the need for guidance on whether access to these accounts would be revoked or if it would be at the discretion of the data holder (DH). They pointed out that customers are concerned about the expiration of their consents and the potential need to revert to screen scraping and that it's inefficient to have to contact each DH individually to understand their intent regarding the continuation of data access.

Consumer Experience (CX) Working Group Update

An update was provided on the CX Working Group by Michael Palmyre:

The DSB mentioned that the consultation for NBL was progressing with draft standards reflecting the candidate standards already in the public domain. An impact analysis of the Rules, including the introduction of buy now pay later (BNPL) products for Authorised Deposit Taking Institutions (ADIs) will be part of the consultation.

The DSB noted that the CX Guidelines for consent-related items, including 90-day notifications and amendments to consents, had been released. The guidelines are available for ADRs to reference, with future obligations set for 14 July 2025 for amending consents and other Rules related obligations coming into effect from November 2025.

The DSB noted that research on consent drop-off and adoption is progressing well, with initial insights from individual CDR consumers and ongoing engagement with business consumers. The research aims to understand drivers of drop-off rates and provide metrics on consumer effort, satisfaction, and trustworthiness.

One member highlighted the need to align definitions of mandatory and optional (voluntary) data, particularly in the context of authentication, as different implementations by DHs impact consumer experiences.

The member also inquired about how the Rules for NBL would apply under the reciprocal DH provisions, specifically if a NBL becomes an ADR but is not defined as a DH. They emphasised the importance of focusing on core objectives and metrics, such as increasing consumer consents, and suggested that the review underway by Rob Hale should consider these aspects to ensure effective implementation and adoption.

Treasury mentioned that to get the DH exception, an entity generally needs to be a DH. They took this specific query on notice to confirm the details.

One member suggested that the DSB should expand its review into potential deceptive patterns to include screen scraping services that mimic CDR consent flow CX. They noted that such practices were not aligned with the government's objectives for CDR and the direction of travel regarding screen scraping, as mentioned in the letter from the Minister in August last year.

The DSB acknowledged the timing concerns for NBLs becoming accredited DHs and the decision to implement Accredited Data Recipient (ADR) opportunities with CDR sooner rather than later. They noted that the introduction of screen scraping was highlighted in the Assistant Treasurer's letter to the Chair and that it would impact use cases, especially for smaller lenders.

The DSB noted that the deceptive patterns work was ongoing, and that they are focusing on identifying patterns that are compliant but potentially not aligned with CDR objectives. They agreed that expanding the scope to include scraping services is a useful consideration.

One member explained that her organisation deals with customers reviewing and comparing their current mortgages with others in the market, rather than new mortgages. They noted that consent rates are traditionally lower in this use case compared to new financing, initially around 10-15%.

The member mentioned that by engaging and coaching users on how to sell the CDR differently, they have seen a 13% uplift in CDR consent rates. This improvement was attributed to the coaching of the CDR requester, who is the Trusted Advisor in the discussion. They was curious if there was any feedback in the consumer experience or the need for more education and feedback during the journey, suggesting that embedding this into the flow could be beneficial.

The DSB acknowledged the members point and mentioned that building trustworthiness and familiarity with the process can lead to higher conversion rates. They noted that more information can sometimes add friction, but it can also increase the propensity to share data if it builds trust and familiarity.

One member asked about the process and timing for the guidance on Rule 7.2 of Schedule 3, which allows accredited ADIs and NBLs to hold CDR data as a DH.

The DSB noted that the change request is available on GitHub for public review and feedback and that they are working with CDR agencies to clarify queries and expectations on how the rules might work in practice. The guidelines will be published through the CX guidelines, and they will work with the community to ensure alignment with expectations before finalising.

One member emphasised the importance of customer trust and understanding in the consent process, noting that customers often cannot distinguish between different data-sharing methods like bank feeds and screen scraping. They highlighted the need for better education and design to address this issue and improve adoption.

One member emphasised the need for a broader education campaign to highlight the value proposition of CDR to consumers. They pointed out that consistent messaging from a central authority is crucial to avoid misinterpretation and ensure the integrity of the ecosystem. They also mentioned that understanding the consumer's perspective is essential, as different consumers have varying motivations for sharing their data.

Treasury acknowledged the importance of broader education campaigns and mentioned that they are responsible for considering such initiatives. They indicated that while there were ongoing efforts to facilitate adoption, the broader education campaign is within Treasury's domain to address.

One member inquired about whether the V5 metrics, which include additional drop-off data, was useful and if they helped in the review process. They was curious about the impact of those metrics on the understanding and addressing drop off rates.

The DSB confirmed that the v5 metrics, including additional drop-off data was useful and have been frequently relied upon to identify key points of focus for improving the process. They provide valuable insights into trends over time and highlighted the need to dig deeper into the details to address drop-off rates effectively.

One member emphasised the importance of methodology used in the drop-off review, noting that the quality of the outputs depends on the robustness of the methodology. They stressed that the findings need to be actionable and provide insights that can lead to improvements. They also suggested involving DHs in the review process to ensure a comprehensive understanding of the issues, as they constantly monitor and address potential technical problems that might contribute to drop offs.

The DSB acknowledged the importance of the methodology in the drop-off review and agreed that the findings need to be actionable. They mentioned that the review is based on metrics from GitHub, and they have been focusing on ADRs to provide a data set not already available from DHs. They are also open to receiving more input from DHs to ensure a comprehensive review and

9

the need to understand what additional information beyond GitHub metrics would be useful for the review.

Stakeholder Engagement

A summary of stakeholder engagement including upcoming workshops, weekly meetings and the maintenance iteration cycle was provided in the DSAC Papers, which were taken as read.

Issues Raised by Members

It was noted two items were raised (Focus areas for 2025 and Presentation on Data Quality) which were both addressed at the meeting as part of Agenda Item 5 & 6.

Data Quality Presentation

Sam Bendat introduced his presentation by providing context about his company, SolvingZero, which operates in the energy data sector. He explained that they interact directly with consumer data through an ADR and were focused on driving outcomes for consumers. He emphasised that their prioritisation framework for issues is based on the impact on core functionality and revenue generation.

The presentation highlighted several critical issues:

- Users consent to share their data, but sometimes the API call returns an object with an empty array, rendering the app useless. This issue has been observed across multiple DHs and endpoints. There is a need for SLAs to ensure timely data delivery.
- Problems with critical data, such as usage data and interval reads can significantly impact the app's functionality. Delays in data delivery, such as those caused by AEMO's performance issues, were mentioned as a major concern.
- Difficult to identify issues with optional fields, for example daily supply charge, can cause significant issues. One example provided was where a known plan's daily supply charge was missing, complicating the data handling process.
- Inconsistencies in data uniformity, such as positive and negative solar feed-in tariff prices, were highlighted. This issue is expected to become more problematic with the introduction of negative feed-in tariff pricing by Ausgrid in July 2025.
- Issues with end dates and start dates, such as unrealistic dates (e.g., year 9999) or empty strings, were mentioned. An example was given where two plans for one home had conflicting start and end dates, making it unclear which plan was active.
- Problems with volume data, such as inconsistent representations of infinite volumes.
- Instances of duplicate data, particularly tariff period objects, were noted as a significant issue.
- Users switching to a new plan with the same retailer and accounts being overwritten.

- DER endpoint responses rarely have useable data.
- OTP issues for users trying to consent.
- The lengthy and complex process of resolving data quality issues, involving multiple escalations and often taking weeks to address even basic problems. There is a need for a more efficient resolution process.
- The importance of ensuring consumers can access their data in a timely manner and proposed having SLAs in place to enforce this.

One member acknowledged the issues raised, particularly around optional fields and data quality, and asked whether the goal was to inform the DSAC or to seek specific actions to address these problems.

Bendat responded that the primary goal was to raise awareness of the issues and to drive actionable outcomes, such as establishing SLAs for data delivery and prioritising data quality improvements.

One member inquired whether they had a sense of the systemic issues underlying the data quality problems and if these were uniform issues across different DHs or specific to individual implementations. It was suggested that a data quality huddle focused on the energy sector might help identify quick wins and address systemic problems.

Bendat responded that whilst he couldn't see all the details behind the issues, he believed that the Australian Energy Market Operator (AEMO) needed to be more involved, as they play a crucial role in the energy sector's data quality.

The Chair responded positively to the suggestion of organising a data quality huddle for the energy sector. agreed that it was a good idea and asked if it could be organised, indicating his support for addressing the data quality issues raised during the meeting.

ACTION: DSB to arrange a data quality huddle specifically for the energy sector to address and resolve data quality issues

One member acknowledged the frustration with the current process and agreed with the suggestion of a data quality huddle. They emphasised the importance of root cause analysis to understand the systemic issues before jumping to solutions. They mentioned that usage data, which is filled in by the distribution network service providers, is often patchy and highlighted the need for clear expectations and interpretations of Data Standards to avoid inconsistencies.

One member highlighted that the process for dealing with issues is fundamentally broken. They described the current process where consumers report issues to ADRs, which then escalate to the ACCCs JIRA board, as inefficient and slow. They emphasised that this process makes it

impossible to achieve quick wins and that the same issues from the banking sector have been inherited by the energy sector. They called for a return to basics on how all parties work together to prioritise consumer benefits and resolve data quality issues effectively.

One member emphasised the importance of data quality and expressed a strong interest in participating in the proposed data quality huddle. They agreed with the need to find quick wins while also understanding the core problems causing data quality issues.

One member highlighted that the process of resolving data quality issues is very expensive for ADRs and DHs. They suggested that this inefficiency should be subject to a cost-oriented review, potentially extending the scope of Rob Hale's current review on costs. They emphasised that the current process involves significant hard costs due to the continuous activity of resolving issues, which impacts both ADRs and DHs.

One member noted that the data quality issues in the energy sector mirror those experienced with banking DHs. They emphasised that these issues affect the underlying integrity of the ecosystem and ultimately result in a poor customer experience. They urged that data quality should be a priority to ensure the overall integrity and consumer benefit of the CDR

The Chair emphasised the importance of integrity and trust in the CDR ecosystem. He pointed out that issues such as negative pricing and unrealistic dates (e.g., the year 9999) compromise trust. He highlighted that these data quality problems, if carried over from the banking sector to the energy sector, indicate a systemic issue that needs to be addressed to maintain the integrity and trust of the system.

Bendat noted that being on the front line of interacting with data and consumers meant that any issues with data quality directly affect their company's reputation. Consumers hold their company, SolvingZero, responsible for any problems which completely compromises their reputation in an industry where reputation is extremely important.

The Chair request that the presentation be shared with participants.

ACTION: DSB to distribute the presentation to members and observers

Meeting Schedule
The Chair advised that the next meeting would be held remotely on Wednesday 9 April 2025 from 10am to 12pm.

Other Business
Treasury provided an update on the NBL Rules, mentioning that the Rules were made, and the minister was pleased to achieve this outcome. They noted that the Rules were signed on the last

day of February, which was the target date. They mentioned that there would be outreach to assist with the implementation, particularly for the NBL sector, and that they would be working closely with the DSB and the ACCC.

Treasury also highlighted that while the upcoming caretaker period might change the way they engage with stakeholders, they would continue to address issues and engage where necessary.

One member expressed frustration with the new Rules, particularly highlighting the delay in addressing the nominated rep process, which she has been advocating for over 3.5 years. They questioned why changes like reducing data availability from 7 to 2 years were prioritised immediately, while the nominated rep process, which she believes is crucial for opening business data for the CDR, continues to be delayed. They emphasised the importance of addressing the nominated rep process as a top priority for the next set of Rules.

The same member also emphasised the need to define success metrics for the CDR program which is crucial for the program's effectiveness and adoption.

Treasury explained that the reduction of data availability from 7 to 2 years was based on extensive consultation and evidence showing that no one was asking for data out to seven years. Treasury acknowledged the complexity of the nominated rep process change, stating that it requires significant drafting resources and engagement with both DHs and ADRs. They are committed to solving this issue but emphasised that it is a complex change which cannot be done quickly.

Closing and Next Steps

The Chair concluded the meeting by expressing his appreciation for the active participation and the quality of the discussions. He mentioned that he learnt a lot from the session and acknowledged the steep learning curve. He emphasised the importance of continuing to work together and looked forward to future collaborations.

Meeting closed at 12:01.