

2 September 2021

Strategic Assessment Team  
Consumer Data Right Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Via email: [data@treasury.gov.au](mailto:data@treasury.gov.au)

**Re: Implementation of an Economy-Wide Consumer Data Right - Strategic Assessment Consultation**

To Whom it May Concern:

Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to make this submission on behalf of our members and the business software industry.

We have been closely following the rollout of the Consumer Data Right (CDR) over the past few years and we have a keen interest in ensuring that this roll-out is smooth and supports our members, the Digital Service Providers (DSPs), who operate across current and future CDR sectors.

This submission has responded to select questions where we can provide valuable insight and feedback. Overall, this submission makes the following recommendations for the Government:

- The Government should pause and evaluate the roll-out of Consumer Data Right and take time to resolve underlying issues. We would also like to see a post implementation review of Open Banking to be published no later than 31 December 2022.
- The Government should be a driver for the CDR and in doing so, commit to their open data policies.
- Once time has been taken to evaluate Open Banking, we would like to see the development of common frameworks and infrastructure that can be utilised by each designated sector moving forward.
- Treasury should give focus to understanding where costs are incurred in the CDR system and what mechanisms would be appropriate for participants to cover these costs.
- The Government should work closely with DSPANZ and DSPs to benefit from our experience in digital service delivery and to ensure a smooth rollout process for future CDR sectors.



We look forward to the release of the Government's CDR Implementation Roadmap to better understand what and when sectors will be designated so that key participants will be well informed about the work ahead of them.

DSPANZ would appreciate the opportunity to engage further on this submission. For further information, please contact Maggie Leese on [maggie@dspanz.org](mailto:maggie@dspanz.org).

**About DSPANZ**

Digital Service Providers Australia New Zealand is the gateway for government into the dynamic, world class business software sector in Australia and New Zealand. Our members range from large, well-established companies through to new and nimble innovators who are working at the cutting edge of business software and app development on both sides of the Tasman.

Yours faithfully,

Simon Foster,  
President & Director,  
DSPANZ



With Open Banking being live for just over a year now, we have heard from our members and fintech, accounting and bookkeeping peers that now is the time to stop and pause to resolve issues with Open Banking and get this right before escalating the roll-out into other sectors. We agree with this view as while there have been a number of unintended consequences identified so far, we anticipate that there are many yet to be found.

A part of this pause should be the creation of a post implementation review to be shared no later than 31 December 2022. Moving forward, post implementation reviews should be conducted for each designated sector or dataset. These should be completed before moving to a new sector or dataset so that these sectors and datasets can learn from previous implementations.

**1. Are there examples of use cases of particular life events of key consumer activities where access to consumer data within or across sectors could significantly improve consumer experience and outcomes? If so, how should such use cases be prioritised?**

DSPANZ believes that the following use cases should be considered in addition to those already included in the consultation paper:

- Cash flow forecasting
- Robo financial advice services
- Hiring staff
- Creating a new business
- Restructuring a legal entity
- Winding up a business

**6. What are the more useful datasets for designation or examples of specific compelling datasets which providers across sectors could especially benefit from? Are there richer opportunities for consumer benefits where datasets from multiple sectors are combined?**

We encourage the Government to be a driver for the CDR program and in doing so, commit to their open data policies. The Government holds comprehensive amounts of personal data and they should be assessing which of these datasets could be suited to CDR designation. Making this data available could result in streamlined consumer services and the combination of this data with other CDR datasets could provide significant benefits to individuals.

**10. Are there other steps we could take to strengthen or develop the CDR regime to enhance the economy-wide roll-out?**

Once a pause has been taken to evaluate the implementation of Open Banking and to resolve any issues, we would like to see the development of common frameworks and infrastructure that can be utilised by each designated sector. We believe that the creation or implementation of the following would make it much easier for data holders, ADRs and consumers to participate across multiple CDR sectors:

- Common approaches to data harmonisation and formats
- Common API structure and centralised listing of all APIs (regardless of sector)

- Central dashboards and consent management for consumers
- Implementing Trusted Digital Identity Framework (TDIF) so digital identity can be leveraged by all participants
- Adoption of common industry security standards such as the ATO's DSP Operational Security Framework (OSF) and DSPANZ's Security Standard for Add-on Marketplaces (SSAM)

As DSPs are important to supporting the delivery of CDR, we recommend engaging with DSPANZ early on the designation of new sectors and datasets to assist with a smooth implementation and roll-out.

For future CDR sectors, we also encourage broader, cross-sector consultations to better understand the participants involved, the datasets that are being considered and potential use cases.

**Further feedback - Existing or planned regulatory and policy initiatives or industry developments or digital maturity levels that should be taken into account when considering the optimal timing and sequencing of CDR roll-out.**

DSPs are critical to the implementation of the government's broader digital agenda and as such, are already involved in the implementation of the following regulatory programs:

- Single Touch Payroll Phase 2 (2022/23)
- Your Future, Your Super (2022)
- Modernising Business Registers (2022-24)

The implementation timeframes for the above programs may impact on a DSPs ability to reasonably participate in the CDR roll-out.

We also understand that a review of the Privacy Act is underway. While we do not know how they may impact the CDR, Treasury should be aware of any potential impacts.

**Further feedback - CDR Costs**

The CDR consultation undertaken to date has not sufficiently focused on the embedded costs within the system. Such costs include:

- Accreditation
- Consumer preparation
- Developing APIs

Treasury should give focus to understanding where costs in the system will be incurred so that this can be communicated effectively to CDR participants. Further, we would like more information on what mechanisms are appropriate for participants (i.e. data holders and ADRs) to recover these costs.