

30 July 2021

Consumer Data Right Division
Treasury
Langton Cres
Parkes ACT 2600

Via email: data@treasury.gov.au

Re: Consumer Data Right rules amendments (version 3) 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 welcome the amendments in the revised Consumer Data Right (CDR) rules making it easier for parties to gain accreditation outside of the unrestricted level. To support DSPs and add-on applications in meeting Schedule 2, we would like to see the Security Standard for Add-on Marketplaces (SSAM) recognised as an appropriate third party management framework. We are also pleased to see that trusted advisers will not be subject to additional requirements under CDR rules.

DSPANZ would appreciate the opportunity to engage further on this submission. For further information, please contact Maggie Leese.

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



Recognition of the SSAM Under Schedule 2

Digital Service Providers (DSP) would like to see the recognition of the Security Standard for Add-on Marketplaces (SSAM) under control requirement 7 of Schedule 2 where Sponsors must implement a third party management framework. The SSAM is a lightweight security standard put in place to increase the minimum levels of security for third party applications that connect to DSPs and ultimately, through to the ATO.

Recognising the SSAM would allow DSPs to reuse what they already have in place to manage these third parties rather than requiring them to meet an entirely new standard under the CDR rules. This would also mean that third party applications could also utilise their self-assessment against the SSAM to meet any relevant security requirements. As the SSAM essentially sits under the ATO's DSP Operational Framework, recognising the SSAM for this next level of accreditation would complement the Operational Framework being a pathway for CDR accreditation.

As the custodians of the SSAM, we are about to begin the process of reviewing the SSAM to revise it and uplift the requirements. Where possible, we will look to align the SSAM with CDR requirements to support our members looking to accredit themselves under CDR. We encourage the Treasury and the ACCC to be involved in this process.

New Accreditation Pathways

Overall, DSPANZ supports the sponsored and representative accreditation options that enable alternative pathways for CDR accreditation.

We expect that some DSPs may look to utilise the sponsorship arrangement to gain accreditation rather than being accredited at the unrestricted level. It would also allow those DSPs looking to be accredited at the unrestricted level to enter into sponsorship arrangements with partners or apps operating in their add-on marketplaces. We believe that DSPs and add-ons will also look to use the representative model in similar ways to the sponsorship option.