Australian Banking Association

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Data Quality Compliance in the Consumer Data Right

The Australian Banking Association (**ABA**) welcomes the opportunity to provide comment on the Australian Competition and Consumer Commission (**ACCC**) consultation on data quality compliance in the Consumer Data Right (**CDR**).

Australian Banks take their responsibilities as Data Holders (**DH**s) seriously and understand the importance of data quality in the CDR. Banks are continuing to commit significant resources to uplifting existing CDR systems while also developing new functionalities to meet new regulatory requirements. Over time, the ABA anticipates data quality to further improve as CDR volumes increase, and systems and applications are given the time and opportunity to mature.

Our view

As noted in our submission to the Statutory Review of the CDR, the CDR is still maturing and customer usage is still very low. One member bank has indicated that only about 0.2% of their digitally active customers have used the CDR. This also means that many of the systems and processes designed to implement the rules and standards have not had extensive real-world use.

As the usage in the CDR increase, more data quality issues are likely to arise and there will be more opportunities to identify and resolve these issues. Where issues have been raised, banks have processes to analyse the source of the error, scan for the extent of the issue, update protocols and conduct training to stop the issue from happening and then communicating with the affected party on the outcome.

Not all issues that are raised as 'data quality' issues may be an error. For example, there may be inconsistent interpretations of standards by either DHs, ADRs or both, leading to a degree of confusion on what the data represents. In some cases, DHs may have some but not all the data for a particular request (for example, a fee that does not exist for that DH or one that is classified as a different type), resulting in empty fields. In other cases, the way data is captured for similar products may also not directly align across banks and it will not always be possible to develop datasets capturing consistent information from different banks.

We also note that there are examples where an absence of clarity in rules and guidance exacerbates data quality issues. As an example, data latency is often raised in the context of data quality and we note there is no objective standard or clarity on what constitutes data latency. Guidance from ACCC acknowledges the requirement for data latency as being commensurate to data presented via other channels is deliberately ambiguous.[1] However this creates the circumstance where perceived data latency by an ADR is likely seen as legitimate, even if there is no objective standard.

Given the complexities involved and the variable interpretations of data quality, it is important that data quality is clearly defined, with categories and materiality ratings being set. A clear framework would allow DHs to understand, track and address issues.

Consistent with these views, we make the following recommendations.

[1] https://cdr-support.zendesk.com/hc/en-us/articles/900001966406-Data-Latency-interpretation

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Key recommendations

1. Develop a typology and categorisation and for data quality issues

Data quality issues arise from a range of factors and causes. We note that a lack of clarity in both the types of data quality issues has resulted in a wide range of issues being classified as data quality related. Clear rules should be developed to define a data quality issue and the category the issue falls under, with standards reflecting these rules. This could allow for a tracking of issues and a consistent approach to addressing them.

As part of this, we suggest a threshold on reporting of rectification items so that very minor and technical rectifications can be resolved without the requirement to report. This would allow data holders to focus on systemic and critical issues first. The more minor issues could be addressed through an alternative forum, as discussed below in Rec 3.

2. Enable greater flexibility for DHs to triage and act on data quality issues

For issues that are required for rectification, we recommend that DHs are given flexibility to triage when other urgent issues arise in the interim. Currently, DHs commit to timings on rectification of issues raised by the ACCC. While addressing these, more urgent issues may arise and DHs should be able to pivot quickly to addressing those as the priority.

3. Implement a forum or leverage existing forums to raise and resolve issues

The ABA supports using a shared forum with DHs, ADRs and regulators to focus on minor data quality issues and allow for the development of a shared schema and understanding of different perspectives. We note that an existing technical standards group could be a helpful starting point, but there may be a need to have a separate, focussed forum dedicated to addressing data quality issues.

4. Introduce a standardised reporting process for incidents including details in the tickets raised and timeframes on response times

Issues that cannot be resolved at the relevant forums and/or issues that fall within the clear rules and definitions of a data quality issue should continue to be raised as tickets within the platform. To ensure the issue can be resolved in an efficient manner, we recommend that there be a standardised reporting process in terms of the information provided and the response times.

For information provided, we consider that the minimum data in each ticket should include the correlation IDs, logs and screenshots of the issue. Further, maximum response times on both the DH and ADR sides will help ensure that incidents can be addressed efficiently and effectively.

Thank you for the opportunity to provide feedback. If you would like to discuss further, please do not hesitate to contact me

Yours sincerely,

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