

# Meeting Minutes

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**Meeting details**

Meeting date: 05 September 2019

**Meeting name**

Implementation Entity Steering Group (IESG)

**Meeting time**

10.00 – 13.00

**Meeting location**

Etc. Venue, 8 Fenchurch Place, London

**Scribe**

Sally Chiwuzie

**Classification**

Public

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Name		Role	Attendance
Bill Roberts	<b>BR</b>	CMA	Yes
Candy Ma	<b>CMA</b>	OBIE – Office of Trustee	Yes
Carly Nimmo	<b>CN</b>	HMT	Yes
Caroline Ambrose	<b>CA</b>	Barclays Bank	Yes (Phone)
Chris Michael	<b>CM</b>	OBIE – Head of Technology	Yes
Daniel Ehreich	<b>DE</b>	Bank of Ireland	Yes
Ed Colley	<b>EC</b>	OBIE - Prog Director	Yes
Faith Reynolds	<b>FR</b>	Independent Consumer Representative	Yes
Gavin Littlejohn	<b>GL</b>	Fintech Representative	Yes (Phone)
Hetal Papat	<b>HP</b>	HSBC	Yes
Ian Cox	<b>IC</b>	OBIE – Head of Monitoring	Yes
Ian Major	<b>IM</b>	TPP Representative	Yes
Imran Gulamhuseinwala	<b>IG</b>	OBIE – Trustee/Chair	Yes
Laura Mountford	<b>LM</b>	HM Treasury	Yes
Mark Chidley	<b>MCH</b>	Independent SME Representative	Yes
Matt Cox	<b>MC</b>	Nationwide	Yes
Phillip Mind	<b>PM</b>	UK Finance	Yes
Robert White	<b>RW</b>	Santander	Yes
Roy Hutton	<b>RH</b>	Allied Irish Bank	Yes

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Sally Chiwuzie	<b>SC</b>	OBIE IESG Secretariat	Yes
Simon McDougall	<b>SM</b>	Information Commissioners Office	Yes
Stephen Wright	<b>SW</b>	Royal Bank of Scotland	Yes
Thaer Sabri	<b>TS</b>	Electronic Money Association	Yes
Vicki Hassan	<b>VH</b>	Danske Bank	Yes (Phone)

### Apologies

Name		Role	Delegate
Alan Ainsworth	<b>AA</b>	Head of Policy, OBIE	N / A
Daniel Globerson	<b>DG</b>	Royal Bank of Scotland	Stephen Wright ( <b>SW</b> )
Paul Horlock	<b>PH</b>	Stakeholder Engagement, Standards and Strategy	N / A
Phillip Mind	<b>PM</b>	UK Finance	N / A
Rebecca Langford	<b>RL</b>	FCA	Kat Cloud ( <b>KC</b> )
Robert White	<b>RW</b>	Santander	Eduardo Martinez Barrios ( <b>EMB</b> )
Will Curley	<b>WC</b>	Tesco Bank	Stuart Pratt ( <b>SP</b> ) (Phone)

### No. Agenda item

#### 1.a – 1.b HOUSEKEEPING: MINUTES AND ACTION LOG

- 1.1. **IG** welcomed IESG members in the room and on the phone, stating that it is the final IESG before the 14 September 2019 deadline.
- 1.2. **IG** welcomed Stuart Pratt (**SP**) of Tesco Bank, using the opportunity to inform IESG members that Will Curley has now left the Bank. **IG** explained that Stuart has joined as a deputy to Will Curley while the process for deciding permanent IESG membership is underway.
- 1.3. Kicking off the agenda, **IG** asked IESG members to note that there is an addendum to agenda item 2.d - CRM/CoP Phase 1 – Impact on the PISP Journey. **IG** explained that the reason for this is that the team were dealing with moving parts and only concluded after the pack was issued.
- 1.4. **IG** invited AOB requests. The following requests were made:
  - 1.4.1. **GL** requested air time to give an update on GOFCoE, the NESTA Open UP Challenge 2020 and an update regarding a call with joint task force on PSD2.
  - 1.4.2. **IG** added an update from the OBIE team on P7 Reverse Payments.
  - 1.4.3. **FR** asked if there could be a discussion about a risk log for IESG. **IG** stated that this could be touched upon within agenda item 2.e discussion – Customer Evaluation Framework. **IG** added that AA unfortunately is unable to attend IESG today and so this agenda item would be covered by **IG** and **EC**.
  - 1.4.4. Following on from the Trustee Letter sent out on 24 July 2019, **MC** requested a conversation around next steps for P2 and P8.

IG noted all requests stating that any further AOB requests could be made during the interlude.

- 1.5. IG stated that the minutes have been socialised with non-material feedback received and incorporated. On that basis, IG approved the minutes for the IESG meeting held on 25 July 2019.

***APPROVAL – IESG\_APR\_LOG\_051- July IESG Minutes - Comments received and incorporated, IG approved the minutes from the July IESG.***

- 1.6. IG moved on to discuss the open actions from the previous IESG meeting on 25 July 2019, inviting people to walk through from slide 27 (**Note: action updates are documented on page 4, with additional comments captured below**).
- 1.7. With regards to action #211 (*Market Share*), IG informed IESG members that no further information can be obtained by OBIE and welcomed Pay.UK and / or the CMA to take over if required, however, IG asked IESG members to note that no further activity would be conducted from an OBIE point of view and on that basis, the action could be closed.
- 1.8. With regards to action #212 (*Implementation Concerns – Evidence Gathering*), IG reminded IESG members that this was the aggregation of evidence with regards to preparedness for the introduction of SCA. IG stated that collation of information was concluded and sent to the FCA who have since then announced the adjustment period. On that basis, IG stated that this action could be closed, adding that if there is time after covering all scheduled items, this could be covered as an agenda item under AOB.
- 1.9. With regards to action #214 (*Programme Update - CRM / CoP*), IG explained that this relates to the addendum provided to agenda item 2.d, and on that basis, this action could be closed.
- 1.10. With regards to action #216 (*MI V3 Roadmap*), IG stated that this is included in the programme update section of the agenda (1c), and therefore could be closed.
- 1.11. With regards to action #217 (*OBIE Monitoring Tool*), IG explained that a memo had been sent out to IESG members on 07 August 2019, and on that basis, the action could be closed.
- 1.12. With regards to #218 (*P7 Reverse Payments*), IG explained that this particular action is closed even though the topic itself has not yet been concluded. IG added that it would be beneficial to discuss this in the AOB section of the agenda.
- 1.13. With regards to #219 (*P15 – Access and Consent Management*), IG stated that a letter was supposed to go out to the CMA9, however, this is partly covered by action 2.b of the agenda, although P15 itself is not concluded. On this basis, IG stated that this action could be closed. FR stated that P15 is broad and wanted to know what the letter that ought to have been sent out to IESG members would have contained. IG confirmed that the initial letter was meant to contain an explanation to the changes made to the CEG, however, the requirement for this was superseded by the update which is covered in the agenda item.
- 1.14. With regards to #220 (*TPP Customer Experience and Operational Guidelines*), IG stated that a conference call with MCh, AA and SM had taken place to ensure that from an ICO point of view, best practice was being observed. IG added that there is a further meeting scheduled for 10 September 2019; this action is therefore completed and can be closed.
- 1.15. With regards to #221 (*TPP Customer Experience and Operational Guidelines*), IG explained that the intention was to update both for the September IESG, however, the Customer Experience Guidelines would be brought back to IESG in October 2019.
- 1.16. With regards to #222 (*Customer Redress Mechanism*), IG confirmed that this was covered in the conversation re #220 above and that future iterations will take ICO input into consideration.

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### ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2018_301_171	21/03/2019	FR / IC	<p><b>Customer Numbers:</b> FR to arrange a meeting with IC re how customer numbers are collected, and update to be included in May IESG.</p>	<p><b>Update 06/09</b> - Following discussions at the September IESG, this was confirmed as closed.</p> <p><b>Update 25/07</b> - The intention is to work with the v3 numbers contained within this pack, but also incorporate the latest thinking on how customer numbers can be measured in the future to ensure consistency. This will be brought to the September IESG.</p> <p><b>Update 17/07</b> – OBIE working on defining this. C/F to the September IESG.</p> <p><b>Update 20/06</b> – This is work in progress with a more detailed understanding of the Customer Numbers, and would be an open discussion at the July IESG.</p> <p><b>Update 23/05</b> - IC taking comments from FR, IG and others on how to set this up for future proofing. This will return to the agenda in the July IESG.</p> <p><b>Update 01/05</b> - IC met with MCH and DJ (who updated FR) on 11/05. IC is concluding on a revised definition for PSU's to share with CMA9 and IESG. Once the revised definition is concluded, IC will collate PSU numbers using the revised definition and share with the IESG in July.</p> <p><b>Update 30/04</b> - IG advised at IESG that there is still some ambiguity on this which the team are working through. C/F to May IESG.</p> <p><b>Update 23/04</b> - Meeting held on 11/04 with DJ/IC/MCH. Propose to close</p>	<p>05/09/2019</p> <p><del>25/07/2019</del></p> <p><del>20/06/2019</del></p> <p><del>23/05/2019</del></p> <p><del>30/04/2019</del></p>	Closed	05/09/2019

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Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2018_301_207	20/06/2019	AA	<b>PISP Journey</b> - AA to build a plan / discovery process around the CRM, COP and code in the PISP Journey.	<p><b>Update 05/09</b> – Further to discussions at September IESG, this action can now be closed.</p> <p><b>Update 12/08</b> - Workshop held on 01/08 with PSR and LSB. This will be an agenda item in the September IESG. Please also refer to agenda item 1c - Programme Update for further details. This action is linked to #214. Propose to close.</p> <p><b>Update 25/07</b> – IG stated that the intent is for the OB team to take regulators through some of the journeys and bring back to the IESG in September.</p> <p><b>Update 22/07</b> - The OBIE team is currently developing the plan and aim to share with IESG at the September IESG.</p> <p><b>Update 17/07</b> - OBIE is currently defining a number of customer journeys for CRM, COP and the interaction between them. Once defined (COB this week ending 19/07), OBIE will undertake an analysis of the journeys to understand the true impact of CRM and COP on the consumer.</p>	05/09/2019 <del>29/07/2019</del> <del>25/07/2019</del>	Closed	05/09/2019
IESG_2018_301_211	20/06/2019	AA	<b>Market Share</b> - OBIE to determine whether it has the data to represent the market share of UK ASPSPs for current accounts on a diagram e.g. on a pie chart.	<p><b>Update 05/09</b> – No further information can be obtained by OBIE. Pay.UK and/or the CMA to take over if required, but no further activity would be conducted from an OBIE point of view and on that basis, action can be closed.</p> <p><b>Update 15/08</b> - AA to provide verbal update during open action walk through at the September IESG. Propose to close</p> <p><b>Update 25/07</b> - There will be a comms going out from OBIE to UK Finance to assist with this analysis. C/F to the</p>	05/09/2019 <del>25/07/2019</del>	Closed	05/09/2019

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				<p>September IESG</p> <p><b>Update 17/07</b> - The OBIE team is currently determining whether this is possible.</p>			
			<p><b>Implementation Concerns – Evidence Gathering -</b></p> <p>a. A smaller group to be set up by UK Finance to understand the size of the problem better as the size will direct the solution</p> <p>b. OBIE (ND) to engage with the FCA to try and answer questions regarding uncertainties with the introduction of SCA, unavailability of eIDAS certificates and unintended consequences of Standards interpretation. The CMA9 to be engage in that process.</p>	<p><b>Update 05/09</b> – No further information can be obtained by OBIE. Pay.UK and/or the CMA to take over if required, but no further activity would be conducted from an OBIE point of view and on that basis, action can be closed.</p> <p><b>Update 25/07</b> - Verbal update provided by ND.</p> <p><b>Update 22/07</b> - Verbal update to be provided at the July IESG.</p> <p><b>Update 16/07</b> - The questionnaire has been sent to stakeholders, including UKF, FDATA, EMA, TPPs and the CMA9. A response is expected by Friday, 19/07.</p> <p><b>Update 12/07</b> -</p> <p>a. OBIE has engaged with UKF, FDATA and EMA to determine the question to be asked of firms. The request will be sent in the next few days.</p> <p>b. OBIE has agreed with UKF to undertake a scoping exercise and a Survey Monkey questionnaire has been circulated. The result will inform the discussions with FCA.</p>	<p>05/09/2019</p> <p><del>25/07/2019</del></p>	Closed	05/09/2019
IESG_2019_301_214	25/07/2019	CM	<p><b>Programme Update - CRM / CoP - OBIE</b> team to work out a plan around CRM / CoP for presentation at the next IESG (05 September) as an agenda item for discussion.</p>	<p><b>Update 05/09</b> - An addendum provided to agenda item 2.d, and on that basis, this action can be closed.</p> <p>Update 15/08 - Paper included in the agenda for the September IESG. Please also refer to agenda item 1c - Programme Update for further details on this. Propose to close.</p>	05/09/2019	Closed	05/09/2019

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				Update 12/08 - RW preparing paper for September IESG.			
IESG_2019_301_215	25/07/2019	IC	<b>Transparency Calendar</b> - IC to review the transparency calendar with regards to account holder name and send an update to GL. This should be fed back to the September IESG during action updates.	<p><b>Update 05/09</b> – Following discussions at September IESG, this action can be closed.</p> <p><b>Update 30/07</b> - IC sent GL email explaining that 7 of the CMA9 have updated the transparency calendar for account name with details given. GL was satisfied with this. Propose to close.</p>	05/09/2019	Closed	05/09/2019
IESG_2019_301_216	25/07/2019	EC	<b>MI V3 Roadmap</b> - Following approval to proceed at the July IESG, EC to populate MI and present to IESG in September.	<p><b>Update 02/09</b> - This is included in the programme update section of the agenda (1c). Propose to close.</p> <p>Update 28/08 - This was presented at PMG on 14/08 and is being prepared for the September IESG.</p> <p>Update 08/08 - On track. This will be presented at PMG on 20/08.</p>	05/09/2019	Closed	05/09/2019
IESG_2019_301_217	25/07/2019	IC	<b>OBIE Monitoring Tool</b> - OBIE team to issue a memo describing what the solution is, the legal considerations and a high level view of the procurement process undertaken.	<p><b>Update 07/08</b> - IC sent memo to IESG members on 07/08. Propose to close.</p>	05/09/2019	Closed	05/09/2019
IESG_2019_301_218	25/07/2019	CM	<b>P7 Reverse Payments</b> - CM to add the EMA to the list of organisations being engaged	<p><b>Update 05/09</b> - Action closed even though the topic remains open. Discussed further at the AOB section of September IESG meeting.</p> <p><b>Update 08/08</b> - OBIE team contacted Thear and Ruth of the EMA re engaging on P7 Reverse Payments; awaiting response. Propose to close.</p>	05/09/2019	Closed	05/09/2019
IESG_2019_301_219	25/07/2019	CM	<b>P15 – Access and consent management</b> – Letter from the Trustee to be issued to IESG members taking into recommendations made at the July IESG	<p><b>Update 05/09</b> - This is partly covered by agenda item 2.b of the agenda and even though P15 remains open, this particular action can be closed.</p> <p><b>Update 16/08</b> - The changes to the CEG, including P15 are covered as an agenda item in the September IESG pack. This supersedes the requirement for a letter. Propose to close.</p>	05/09/2019 <del>25/07/2019</del>	Closed	05/09/2019

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				Update 01/08 - CM advised that minor changes to the CEG have been proposed and this is going through consultation. This letter will go out wc 12/08 to allow time to close consultation and collate feedback.			
IESG_2019_301_220	25/07/2019	MCh	<b>TPP Customer Experience and Operational Guidelines</b> – MCh to engage with ICO to review reports written by the Behavioural Insight Team to gather relevant information towards the publication of the guidelines.	<p><b>Update 05/09</b> - Conference call with MCh, AA and SM had taken place to ensure that from an ICO point of view, best practice was being observed. Further meeting scheduled for 10 September 2019; this action is therefore completed and can be closed.</p> <p><b>Update 28/08</b> - Call with MCh / AA / SM to discuss ICO input into TPP Guidelines. MCh to continue to work with the ICO team on the Operational Guidelines and the Customer Redress Mechanism. Propose to close.</p> <p>Update 15/08 - A meeting has been scheduled for 28/08 between OBIE and ICO to take this engagement forward. Propose to close.</p>	30/08/2019	Closed	05/09/2019
IESG_2019_301_221	25/07/2019	MCh	<b>TPP Customer Experience and Operational Guidelines</b> - MCh to bring the content for Wave 'A' to the September IESG.	<p><b>Update 05/09</b> - The Operational Guidelines presented at the September IESG and the User Experience Guidelines would be brought back to IESG in October 2019.</p> <p><b>Update 28/08</b> - This is included in the agenda for the September IESG. Propose to close.</p>	05/09/2019	Closed	05/09/2019
IESG_2019_301_222	25/07/2019	EC	<b>Customer Redress Mechanism</b> - EC to have an OBIE / ICO input meeting facilitated by SM to map out the framework and leverage what needs to be done.	<p><b>Update 05/09</b> – This as covered in the conversation re #220 above and that future iterations will take ICO input into consideration.</p> <p><b>Update 28/08</b> - Covered as part of action #220 above. Propose to close.</p> <p>Update 15/08 - A meeting has been scheduled for 28/08 between OBIE and ICO to take this engagement forward. Propose to close.</p>	30/08/2019	Closed	05/09/2019

## 1.c PROGRAMME UPDATE

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### 1.c.i OBIE STATUS REPORT

- 1.17. **IG** introduced the programme update section, inviting **EC** to walk IESG members through, adding that the implementation of DMS is imminent and an update on this would be welcome. **IG** also stated that an update on the contractual negotiations with Pay.UK on Confirmation of Payee (CoP) would also be beneficial as it is taking up time within OBIE.
- 1.18. With regards to DMS, **EC** stated that on-going activities include industry testing with bespoke TPPs and some of the CMA9 which has been successful thus far. **EC** explained that the success is due to the fact that the internal UAT on the product was undertaken intensively and in parallel to the evolution of the product, there was good collaboration between OBIE and Resolver to ensure a high quality delivery. **EC** added that feedback on delivery transparency within the IESG audience would be welcome. **EC** explained that the intention is to make this available the weekend of 13 September 2019 and thereafter, it would be a phased implementation; the existing 1.5 DMS will not be switched off. **MC** enquired about any due diligence performed with regards to the third party provider solution particularly from a GDPR point of view, as the data stored would be exposed. **MC** asked if this is visible to the CMA9 / IESG members anywhere, stating that this is a stumbling block within Nationwide in considering the adoption of DMS. **EC** responded stating that there are two points to this:
- 1.18.1. GDPR – legal advice on the arrangements between the three parties who act as an agent was sought; and
  - 1.18.2. In terms of due diligence, this will be shared.

**ACTION – IESG\_2019\_301\_223 - Programme Update – DMS – EC to share due diligence re third party suppliers with IESG members**  
**Due Date – 17 October 2019**

**IG** agreed that this is a good point, suggesting that it should be reconciled at PMG level. **MC** agreed that reviewing this at PMG seems right, however, in terms of migrating to the new DMS solution, the view has to be aligned and sufficient notice would be required. **IM** wanted to understand the relationship between a TPP and the Resolver platform, **IM** added that some organisations might approach this with trepidation. **EC** explained that the TPP will sign up to a licence which will be obtained from OBIE and then the underlying service will be utilised. **RH** asked if the contract could be shared, to which **EC** explained that as soon as participants sign up, some information would have to be shared. **IG** reiterated to IESG members that the conversations within the housekeeping section are limited to implementation, delivery and progress updates.

- 1.19. With regards to CoP, **EC** explained that the key principle of the arrangement with Pay.UK was a tripartite agreement - between OBIE and participants, between OBIE and Pay.UK and between Pay.UK and participants as follows:
- 1.19.1. Phase 1 is for OBIE as the provider of the service - any ASPSP enrolled within the OBIE ecosystem that wishes to deploy either the descending or acknowledgment response at CoP endpoints.
  - 1.19.2. Phase 2 is yet to go into build and expands this principle to CoP-only participants – not ASPSPs and not within the OBIE ecosystem.
- EC** explained that the objective of the agreement is to ensure competition and capabilities across all parts of the service; negotiations with Pay.UK are on-going with a signed agreement imminent, which will enable the facilities to be deployed by those directed or any others both in a sandbox testing mode and in production. **SW** asked if phase 2 includes Jersey and Isle of Man. **EC** stated that as long as Pay.UK incorporates those entities as participants to the agreement, then there will be no objection from an OBIE point of view. **IG** raised a concern around the length of time it has taken to get an agreement, stating that the expectation is that an agreement would be concluded by the October IESG. **EC** agreed and stated as an additional point that from a cost perspective, phase 2 is funded by Pay.UK; there is therefore no requirement of the CMA9 under the order.
- 1.20. **FR** stated that it would be helpful to engage consumer representatives as it is not strictly an Open Banking requirement, to which **IG** responded that this could be covered under agenda item 2.d – CRM / CoP Phase 1 – Impact on PISP Journey.

- 1.21. **MCH** stated that it would be useful to capture a pictorial view of the status report in one place. **IG** asked to take this away as it might be an opportunity for a refresh. **IG** added that the two elements to consider are:
- 1.21.1. Mark a time when a comprehensive review of project status by way of an end of year update perhaps, or
  - 1.21.2. There is a requirement to give an update (for example, post 14 September).

***ACTION - IESG\_2019\_301\_224 - Programme Update - IG to give a post implementation update on the status of Open Banking.***

***Due Date – 17 October 2019***

- 1.22. **FR** asked if there would be an update on the formalisation of the VRP and sandbox protection framework (especially the consumer aspect), **EC** stated that that the framework was agreed and signed up to by all the parties in wave 1 of the sandbox testing. **IG** added that there will be another update from the VRP in an imminent IESG.
- 1.23. With regards to the CMA9 implementation, **IG** asked for highlights to be given by **EC**, followed by questions by the CMA9, if any. **EC** stated that at a macro level, the CMA9 have completed majority of deliveries, including App-to-App, some are new and going through live proving capabilities. Several of the CMA9 have yet to complete specific parts of the implementation, in particular around international payments and open batched delivery. In the context of the order and the ecosystem, **EC** stated that there is interest in that functionality but none that are ready to progress to implementation. **EC** stressed that while the OBIE is comfortable with that, the main focus needs to be on getting those deliveries over the line and completed. In respect of the red RAG status, **EC** referred to 3.1.2 (especially with regards to the comment by **MC** on P2 and P8), that there is aligned agreement for deliverables for P2, albeit with some un-finalised points around the actual implementation time across each of the CMA9. With regards to P8, **EC** stated that there are some points around the implementation among the CMA9 that need to be clarified, perhaps by way of a detailed workshop to enable the CMA9 to confirm their delivery dates.
- 1.24. **MC** stated that Nationwide's view with regards to P2 and P8 is that it is still unclear what value these would add, and in certain areas, they are in conflict with PSD2 regulation. **MC** wanted to know if these points would be addressed in the upcoming Heads of Retail (HoR) Meeting scheduled to take place on 11 September 2019, or whether these points would be picked up at the bilaterals, adding that before this goes to technical build, it would be useful to get some clarity. **EC** stated that this could be picked up at the bilaterals.
- 1.25. With regards to both P2 and P8, **IG** affirmed his confidence in the fact that this went through all the appropriate and normal channels to arrive at a list of what needs to be built, and how. **IG** added that a Trustee letter was sent out on 24 July 2019 and if there were concerns, would have expected a written response. **IG** stated that as this was a direct request from the Trustee to the CMA9, it is disappointing to be hearing about it at IESG. **IG** added that it would be an inappropriate agenda item at the HoR meeting because it is too technical. **MC** stated that a HoR letter was written to the Trustee, with a one to one meeting being scheduled. **IG** stated that no letter from the Nationwide HoR has not been received. **CM** explained with regards to P2, that there is a subtlety and that the Trustee letter talks about implementing a specific functionality, which has a lot of elements to it; TPPs and ASPSPs have questioned exactly which elements of the technical functionality are required to be implemented. **CM** added that this has been brought to the attention of TDA to attach a definition to what is required. **IG** stated that if the principle of whether P2 is of value to customers and within the remit of the Order is being called into question, then that should be addressed by way of a letter to the Trustee. **MC** explained that this is not being raised in detail at this forum, but by way of a reason for the non-commitment to delivery plan. **SW** asked what the workshop on P8 will cover in light of 14 September deadline looming. **EC** explained that the workshop will cover detailed conversation about the implementation aspects of P8 as this does not support the September delivery. **HP** stated that HSBC will not be contesting the principle of P8, but trying to ensure that it aligns with improving customer experience. **HP** added that this is the lower level customer experience journey that needs to be agreed on in order to move on to what the design process should be. **SW** asked to catch up with **HP** after the meeting. **FR** asked if a consumer representative could attend the P8 workshop, **EC** agreed.

***ACTION - IESG\_2019\_301\_225 - Programme Update - P8 workshop to be organised to clarify points on implementation.***

***Due Date – 17 October 2019***

- 1.26. **EC** referred IESG members to the red RAG status recorded at the bottom of slide 31, explaining that it is largely because of the Cater Allen delayed implementation; they have been undergoing a major platforming which was a prerequisite to the deployment of capabilities for Open Banking. The customer migrations should conclude towards the end of September / early October 2019. **EMD** stated that the implementations are dependent on migration of core banking and this is the key element that will enable the Open Banking systems to deliver.
- 1.27. **IC** added that there are four banks under directions, with one released from the last IESG in July.
- 1.28. **IG** introduced the next section relating to the MI, stating that the traffic continues to grow (up 20%), showing good progress. **IG** added that additional MI has been incorporated from slide 49 onwards, adding that PMG has seen the MI, and even though it has not completely settled down, it is making good progress. **IG** explained that the information contained within this section includes the number of TPPs working with individual banks (120), information on the number of payments made, which is still small in comparison to AIS but that this is set to change. **IG** informed IESG members that these statistics would not be published on the website as it makes sense to be confident in the numbers first. **SW** asked if PSU numbers would not usually be provided. **EC** stated that some PSU numbers are usually provided, however, this is not at the same level. **SW** and **EC** agreed to pick up bilaterally.
- 1.29. **IG** moved the agenda on to the authentication efficacy metrics on slide 52, explaining that it shows the proportion of customers who start on a redirect journey and return successfully back to the bank. **IG** added that the banks have provided the information and the team are going through a reconciliation process, after which the numbers will be refined. Broadly speaking, **IG** stated that the conversion / success rates are low and the MI provided by the banks show what implementations (good or bad) look like, adding that the Office of the Trustee will continue to review.
- 1.30. **RR** asked if 'authentication failed' is due to a technical fault, stating that if a CoP tries twice and for example, cannot remember the detail and does not get through what the label would be. **EC** stated that it would 'abandoned'. **RR** suggested that 'failed' means a technical failure within the API. **EMB** disagreed on the grounds that there is evidence to suggest that TPPs call to test that the interface is up and running, and these amounts to thousands of calls in a day. **EMB** suggested that the figures need to be matured to understand the source of these metrics so that they can be confirmed as correct. **IG** acknowledged this as an important caveat, but one of the benefits of the analysis shows a decent amount of traffic that is not polling. **IM** agreed with **EMB's** analysis, stating that if there is consistent polling across all of the CMA9 from the TPPs, this will have an effect on the banks, and the smaller the bank, the more the polling. **EC** explained that the figures for the authentication need to be looked at alongside the PSU adoption and the volume metrics. **TS** stated that he could not reconcile with the data on slide 50 which shows 100% success rate of PIS transactions, to which **EC** explained that the payments process slide is about successful payments as opposed to multiple API calls.
- 1.31. With regards to API volume growth, **EC** stated that thus far, growth has been steady and coming into September 2019, a number of TPPs are expected to be looking for data which are not obligatory; this will drive failure rates short term whilst TPPs get used to the implementation.
- 1.32. **FR** wondered if **HP** would like to discuss why the 'abandoned' numbers are so high across the HSBC brands and a lot less for **RR's** LBG figures – why are some calls being abandoned and not others? **HP** stated in the case of M & S, App-to-App is not yet live, therefore, polling vastly outweighs real customer flows and there is no feedback to suggest there is a problem, adding that the business customers MI seems to be online desk sessions, App-to-App does not apply and yet, the success rate is higher, therefore, the MI does not match logic. **HP** explained that it is hard to get into the data and not really been a top priority but needs to be understood. **MC** stated that this will vary from one organisation to another. With Nationwide, **MC** explained that half of the failures are down to either polling or a known issue between Nationwide and RBS. **RR** did not have much else to add, stating that it is a black box, some information on this could be provided before the next IESG.
- 1.33. **IG** stated that this is helpful information for the bilaterals; the huge disparity cannot be explained by size as there are some small entities, but it is a good place to start. **IG** added that it would be good to note the correlation with compliance with the CEG. **FR** stated that in due course it would be helpful to get TPPs to give a view on their

experiences and whether these marry across. **IG** stated that this information is proprietary to the TPPS and therefore not contained in the pack, however, the rankings are similar.

- 1.34. **SW** asked if this could be cross referenced to the JIRA tickets because the issue being worked on between RBS and Nationwide is a service ticket, therefore there should be service tickets where TPPS have got either a problem with using the APIs or the authentication. **IG** stated that this correlation would be helpful, however, the one ticket could account for the problem. **FR** stated that this would correlate to technical failures, but not to account for the PSU abandonments. **IG** stated that if the process does not work for technical reasons, the customer would abandon it. **IG** suggested that further questions on definitions of JIRA tickets should be taken offline and directed to **EC**. **IG** agreed that the definitions of the JIRA tickets should be crisper and clearer and the caveats better understood.
- 1.35. **IG** stated that the funnels continue to look strong with almost 300 TPPs in the process of applying to come into the ecosystem, 120 active, 75 non-CMA9 ASPSPs that are applying to come into the ecosystem, 44 have signed up to terms and conditions and so are active in the directory with commitments made to the OBIE. **EC** added that the focus (with regards to non-CMA9 participants) is starting to shift from a direct relationship to using technical service providers. There are a lot of small institutions and the aim is to ensure that they get to the ecosystem in the most effective way. With regards to technical service providers and consent dashboards, **RR** stated that what is happening is that the same TPP is appearing multiple times on the consent dashboard and asked whether the ecosystem and IESG have the desire to put a bit more transparency at the back end of the ASPSP dashboard. **EC** clarified, stating that there are three types:
  - 1.35.1. Those that are helping the ASPSPs service their APIs.
  - 1.35.2. Those that are entirely focussed on the consumers and the TPPs interacting with the consumers; and
  - 1.35.3. Those that are sitting across ASPSPs and TPPs.**EC** explained that **RR**'s comments relate to TPPs that are either consuming regulated actors or where they are coming in as unregulated entities - the TPP is regulated and as such is acting across a broad spectrum of businesses. **EC** added that while not going back into onward provisioning, that level of transparency should be considered. **IG** suggested addressing this in AOB or a topic at the next IESG in October 2019. **EMB** stated that Santander is seeing situations whereby TSPs coming into the ecosystem are not working according to onward provisioning best practises – this is important because TSPs will be working with TPPs and visibility of consent would be lost. **IG** stated that the intention of the CMA9 is for the ecosystem of ASPSPs to grow outside of the CMA9 and the OBIE has supported this approach. However, this strategy is in the world of diminishing returns because the non CMA9 participants are small entities without the financial and time bandwidth required and therefore, they find other technically able parties to do the plumbing for them. **IG** explained that the strategy being explored is to invest time instead on a small number of larger players, empower them to speak to other participants; consequently, terms and conditions would need to be modified to accommodate the new message.
- 1.36. **IM** explained that when onward provisioning was being defined, the standards were there to accommodate the right interpretations; schemer allows the provision of the right annotations as interpreted by the TPPs and ASPSPs. The difficulty is that the FCA made clarifications on an outline of the TSP model where a TSP can provide their services outside of the perimeter of the regulation. **IM** was of the view that the capability to provide the correct information exists, but seems to be a misinterpretation at the moment. **FR** added that a Consumer Consent Roundtable is being organised on 12 September 2019, onward sharing is scheduled as an agenda item and IESG members are welcome to attend.
- 1.37. **IG** mentioned the social media analytics, stating that it benefits from the Fingleton / ODI Report which came out within the same time period as the analytics was pulled, adding that the report was very well received and some of this impact has come through in the social media numbers.

## 2.a READ / WRITE API SPECIFICATION v3.1.3

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- 2.1. **IG** introduced the paper, stating that these are updates to the Read / Write Specification v3.1.3, a lot of which are outcomes of approved change requests. **IG** stated that these have been through full discussions and obtained sign off at PMG and TDA, and are subsequently presented at IESG for final approval.

- 2.2. **CM** added that this was approved unanimously at TDA with the caveat that these are optional / conditional enhancements, and therefore not mandatory for any ASPSP or CMA9.
- 2.3. **IG** stated that there was no reason not to approve this paper. **IG** approved the paper.

***APPROVAL IESG\_APR\_LOG\_052 - The Trustee approved the publication of the Read/Write API Specifications v3.1.3 - optional / conditional enhancements including remediation of a number of known issues in v3.1.2 and 4 approved change requests.***

## **2.b CUSTOMER EXPERIENCE GUIDELINES v3.1.3**

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- 2.4. **IG** introduced the next agenda item - an update to the Customer Experience Guidelines, stating that this relates to one of the actions that came out of the P15 discussions.
- 2.5. **CM** explained that there are 2 main groups of changes.
  - 2.5.1. The action arising out of P15 discussions - making a presentation of data access and consent details to include mobile channels. **CM** stated that there still minor updates in progress.
  - 2.5.2. There are other change requests and guidance that are being included - a minor update to address compliance to High Cost Credit (HCC) regulations – changes to balance displays on ASPSP domain and ‘available balance’ changed to ‘balance’.
- 2.6. **IM** stated that it would be useful to understand the launch pattern for any changes to the use of the overdraft balances and the way people interpret these through the transparency calendar mechanisms. **CM** explained that what is being discussed in this paper is balance displayed to a customer in the ASPSP domain and its compliance with the HCC regulations. **CM** added that there is a separate action with a current survey underway which is trying to understand what ASPSPs currently do in the API channel and what they are planning to change (if anything) regarding credit line. **CM** stressed that this is separate to the CEG, but needs to be managed carefully. **CM** implored IESG members, including the firms and ASPSPs they represent to respond to this survey. **EC** added that the key point is that changes need to be communicated to TPPs in a timely fashion; these responses then need to be articulated in the transparency calendar to ensure that all can see the changes that are being made to payloads.
- 2.7. On the grounds that this paper has gone through all the appropriate governance, including consultation and procedures required, **IG** approved this paper.
- 2.8. **FR** raised a concern regarding access is to be deleted for the customer. **FR** was concerned about some of the dialogue that has happened in order to bring about this change – TPPs suggested that when someone revokes their consent to the TPP, there should be a delay between the revocation of consent and the firm calling on the delete endpoint so that they are able to contact the consumer to ensure that they definitely want to revoke their consent before the delete endpoint was called. **FR** explained that the CEG states that the delivery end point should be called as soon as it is practically possible, but it is not immediately, stating that the preferred term would be ‘called immediately’ and that firms do the leg work before consent. **FR** explained that there is potential for some wriggle room between consent being revoked and the delete endpoint being called which creates some risk.
- 2.9. **CM** stated that there is an obligation on the TPP to act if a customer wants to remove consent, but this has to be done as soon as is practically possible. There are technical reasons why it cannot always be done immediately, which is what this is trying to cover. There is no legal reason for requiring an immediate deletion of access; hence it should be done as soon as it is practically possible. **CM** explained further that while the process is evolving, the aim is to get TPPs to act in a consistent manner; explaining also that this process has gone through quite a few iterations. **IG** stated that on the basis that there is not a lot the OBIE can do to mandate the TPP to recognise anything that is written in the CEG, the wording is ok because if they cannot comply with what is written down (i.e. for example, ‘immediate’), then it becomes difficult. **FR** stated that it would be helpful to know the specific technical examples, and if there might be any more; if there are gaps, these should be addressed to avoid gaps in legislation in future. **FR** insisted that the room for manoeuvre creates risk. **IG** stated that this point needs to be made directly to the

regulators, and also suggested that this could be covered in the Consumer Consent Roundtable on 12 September 2019.

- 2.10. In terms of withdrawing consent, **SM** explained that from a regulatory / GDPR point of view, the ability to withdraw consent process has to be as seamless as the mechanism for gaining consent. The guidelines cover that adequately as GDPR is not explicit on wording. **SM** appreciated **FR**'s concerns about tricks and loopholes; however, the requirement is clarity that the process is practical.
- 2.11. **IM** stated that the terms of immediacy are very difficult not only because the endpoint may not be called when it should be, but there is an entire process at the ASPSP to interpret and effect this, therefore, there may be a lag even though that information has been broadcast. **FR** stated that the concern was that some firms wanted to contact consumers after the consumer had revoked consent and before the firm had notified the ASPSP to revoke access so the firm could ask the consumer to confirm verbally that they definitely wanted to revoke the consent. In terms of the time lag, **FR** stated that it would be ideal for this to be real time, but there is a delay to the endpoint and this will have to do. **IM** stated that this needs to be considered from the point of view of the TPP - under the auspices of GDPR and consent revocation on the TPP, would that firm be contacting a consumer and potentially gathering consent again through conversation? The ASP angle is a bit of a red herring. **FR** confirmed that was the concern and it should not be allowed. Firms should ensure they inform the consumer appropriately of the impact of revoking consent before the consumer confirmed revocation
- 2.12. **IG** stated that this sits within the risk category that needs to be focussed on, however, the language chosen carefully by the OBIE team is appropriate, adding that there will be further iterations over time.
- 2.13. **RH** stated that in CEG 3.1.3, there are mandatory elements (HCC) and some of that relates to the 3.1.3 release. In terms of implementation timelines, **RH** wanted to know if they would all be released at the same time. **IG** stated that 3.1.3 surfaces in bilateral agendas and could be covered there.
- 2.14. **IG** thanked IESG members for contributions to discussions on this topic and asked the secretariat to minute this paper as approved.

**APPROVAL - IESG\_APR\_LOG\_053 - Customer Experience Guidelines v3.1.3 - Guidelines updated to incorporate changes in line with v3.1.3 of the API Specifications as well as providing clarifications that have been requested by industry stakeholders.**

## 2.c PSU DEFINITIONS

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- 2.15. **IG** introduced this paper, stating that a lot of work – time and effort went into creating the V3 MI and the PSU numbers are incredibly helpful but do not tell the whole story largely because they provide insight into the depth of use but not intensity of use. **IG** stated that the Office of the Trustee, under IC's leadership prepared this memo that has been circulated to PMG and DWG, the principles of measuring this information was accepted, especially as it shows the CMA Order is being adhered to, but there is work required involved in implementation.
- 2.16. **IG** explained that the team are requesting feedback from IESG on this document; written feedback would be accepted up to 20 September 2019. **IG** added that it would need to go through impact assessment on implementation as a group as well as on individual levels. **IG** stated that a few comments would be taken as part of the discussion on this paper, however, the main request is that feedback should be addressed in writing at IESG level. **IG** added that impact assessment would be at PMG level.
- 2.17. **RH** stated that this is a complicated piece of work, and so to set expectations, delivering MI as an organisation on a system that was not built to deliver this will be hard, especially in terms of sustainability. **RH** stated that it is not in the AIB plans. **IG** responded by stating that the bank will not be monitoring this MI, adding that this is why an impact assessment is being planned.

- 2.18. **IG** asked if the CMA9 would be writing back with feedback. **CA** stated that she will write in as there are more thoughts as to what can be built out of this than concerns. **IG** stated that through the impact assessment, it could turn out that the detail is more or less granular depending on the results.
- 2.19. **IG** stated that feedback would be welcome and that when the impact assessment is being done; the request is that it should be done at a decent level of detail. There will be questions as to difficulty, identifying any quick wins, etc.
- 2.20. **HP** asked where the feedback should be directed. **IG** stated that there are two strands to this.
  - 2.20.1. High level principles should feedback to the Office of the Trustee (effectively an IESG strand) to enable non CMA9 involvement.
  - 2.20.2. The impact assessment will be through PMG.
- 2.21. **RH** asked if this will route through PMG or TDA, to which **IG** stated that the OBIE team will communicate this information. **EC** commented that it would be a bit of both forums. **SW** agreed with this approach as the elements involved sit within the remit of both forums.

## **2.d CRM / CoP PHASE 1 – IMPACT ON PISP JOURNEY**

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- 2.22. **IG** introduced this paper stating that this is not anything OBIE is doing to support Pay.UK in the delivery of the Confirmation of Payee, but everything to do with the actual PISP journey itself and the impact that Contingent Reimbursement Model (CRM) and Confirmation of Payee (CoP) could have on the PISP journey in future. **IG** explained that when CRM and CoP were envisaged and various codes had been created, the PISP journeys were not considered. **IG** added that it is crucial, especially in light of conversion rates of customers not to go back to take friction from the authentication journeys for PISP. **IG** broke down the teams actions, twofold:
  - 2.22.1. Talking to Pay.UK to understand how CoP can be delivered in the PISP journeys; and
  - 2.22.2. Talking to other bodies about how CRM can be now be specifically addressed in the PISP journeys.
- 2.23. **IG** went on to explain that the team have produced an addendum, which at high level, is an update on recent conversations with the CMA9, CoP phase 1 and specific milestones as to the scope and timeframe for completion. With regards to the addendum, **IG** explained that this was produced last minute because there were some moving parts which only just concluded.
- 2.24. **CM** took over, explaining with regards to timescale and delivery, that there is an OBIE / Pay.UK workshop running with Pay.UK on 19 September 2019, invitations to the usual stakeholders in the ecosystem are due to go out on 06 September 2019. The intention of the workshop is to define CoP, including scope to bridge the knowledge gap across the PISPs who are about to come into the ecosystem and/or merchants who have vested interests.
- 2.25. **CM** added that this will also be looking at potential solutions. **CM** explained that friction is a good thing if it is informative, but if it is in the wrong place, it creates a bad user experience; there are different models depending on the type of payment. One of the challenges is that if CoP is introduced at a post authentication place, then this creates a problem because if customer needs to change the payment order, they cannot and need to cancel, this creates a bad user experience. For this reason, **CM** explained that it might make sense for PISPs to manage the entire experience.
- 2.26. **CM** explained further that in parallel, the team will be looking at a better understanding of how CRM can work in a PISP journey. By 23 December 2019, V3.1.4 of the API specification and Customer Experience Guidelines will be published to include propositions and standards that cover CoP and CRM in PISP journeys. At the moment this is a gap and there are significant concerns about friction happening in the wrong place and causing damage.
- 2.27. With regards to implementation, **CM** stated that this is still TBC because there is no view as yet and dates need to be decided in conjunction with Pay.UK.

- 2.28. **TS** asked if CRM is applied to PISPs, and whether the discussion has been concluded elsewhere or if this is this just about CRM for ASPSPs. **IG** summarised this by stating that CRM needs to be applied by ASPSPs, there is no mention in the CRM code on what to do as an ASPSP when it is a PISP that has approached. **TS** stated that a PISP cannot be regarded in the same way as an ASPSP as one of them knows a customer and has history of transactions and the other one deals with customers on a one off one basis with no visibility of what they have done in the past. **HP** echoed **TS**'s comments, stating that on principle, there should be no reason why CoP should not be applied to a PISP, otherwise there is a risk that fraudsters will move to the Open Banking channel to evade the CoP control that is in the direct channel. In particular for the ecommerce journey, **HP** stated that because the PISP knows the legal name of the merchant and their account number, there is no need to run CoP checks. As this does not have to be applied till March 2020, there is enough time to create a slick and well controlled customer journey for the CEG. **EMB** confirmed that fraud attempts in Open Banking have already been made in Santander, and the point is that this is a new channel and fraudsters will explore for opportunities; it would be good to identify a positive friction so that customers and PSUs will be safe.
- 2.29. **FR** stated that the CRM code was heavily debated between consumer and industry representatives; the debate particularly circled around what the customers' requisite level of care is and what could be expected from a consumer. **FR** added that the only area where there is concern is in an ecommerce journey where the CoP effectively says there is a mismatch between the merchant and account number and it will fall to the consumer to accept or reject and accept liability if it goes wrong. **HP** stated that the PISP knows the name of account number, **FR** explained that where the PISP has failed to do due diligence on that merchant or has got it wrong, the consumer will bear the risk; the only gap is the lack of requirement on the PISP to do more robust due diligence on the merchant. **CM** stated that this only applies in certain PISP models. **FR** explained that the process needs to ensure that the journeys do not put unfair responsibility on the consumer so they do not bear more risk than is reasonable to expect of them.
- 2.30. **TS** stated that in the unusual niche use case where they are not identifying the merchant correctly, the PISPs would want to correct that. **FR** explained that in the meantime, it would be the consumer who has borne the risk.
- 2.31. **IG** stated that the intent is not to solve the problem at this IESG meeting; however, the discussions demonstrate that this is on the right track. **IG** added that the ASPSPs and PISPs cannot be left to their own devices, neither can customer protection be sacrificed or fraud allowed to creep in, but a lot of friction can be counterproductive. **IG** added that representation around the table would be ideal for the workshop. **IG** stated that the timeline seems ambitious given that elements of this are contentious and wanted to understand the mechanism for going back to PSR, LSB, Pay.UK and FCA to ensure that once OBIE has completed work as a consultative body within the ecosystem, that sign off process is obtained. **IG** explained that from an OBIE point of view, this could be done under the auspices of the Order, but coherence across the ecosystem would be ideal. **CM** explained that COP is straight forward, but ultimately, this is Pay.UK's governance process and OBIE is trying to ensure that there is a collaboration to ensure that the right solutions for CoP within the context of PISP journeys is obtained; **CM** stated that the 23 December 2019 timeframe is ambitious but achievable for CoP because it ties in with Pay.UKs time lines for defining solutions for CoP phase 2. **CM** stated that CRM is different with the workshop on 19 September being about CoP and not CRM, stating that CRM is a different challenge – the workshop on 19 September is about CoP and not CRM, better understanding required as to what sits with PSR vs. understanding LSB and the role of PISPs.

## 2.e CUSTOMER EVALUATION FRAMEWORK

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- 2.32. **IG** introduced the paper, stating that **EC** would provide an update in terms of timing and implementation, avoiding a content discussion, going instead for a logistics point of view.
- 2.33. **EC** explained that a lot of preparatory work has been done and the OBIE is in the process of engaging with Bristol University in terms of challenging the evaluation framework against, not just MI available from the ecosystem, but information available from the broader industry and available sources. **EC** stated that this has been tracked together to be able to evaluate the outcomes and success of the Order. **EC** added that the piece of has been tranced up into two stages, the aim of which is to validate the framework and to ensure that the OBIE team is clear on what the indicators against progress are vs. the actual measures and how these can be delivered as an overall framework. **EC**

stated that the intention is to get to a framework by the end of this year, and the actual measures will take place at a later date.

- 2.34. **IG** encouraged the team not to over-spec this as information already exists – it is meant to be a light process, consistent and not re-inventing the wheel.
- 2.35. **EC** informed IESG members that following a consultation, this paper will be returning to IESG on the 17 December 2019.
- 2.36. **FR** stated that the only concern is around the timing of the consultation. **FR** was happy with a consultation in November followed by presentation in December, but did not think timelines should go beyond that.
- 2.37. **IG** concluded by advising IESG members to feedback on content directly to AA.

## **2.f TPP OPERATIONAL GUIDELINES**

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- 2.38. **IG** introduced this paper, stating that it is being presented for approval. **IG** went on to give context – the Technical Guidelines, User Experience Guidelines and Operational Guidelines have been documented; the Customer Evaluation Guidelines (CEG) paper is not ready yet, therefore, this is the Operational Guidelines only, with CEG Guidelines aiming to come back to IESG which discusses service levels that the TPPs should adhere to in order to create good customer experiences / outcomes. **IG** added that these guidelines are not mandatory, however, consultation with TPPs have been conducted, there is nothing contentious within the paper and TPPs have stated that the guidelines are helpful in providing a steer as to their processes.
- 2.39. **CM** explained that the CEG might be included as part of these guidelines. **IG** agreed, but explained that this should be clearly marked with a more detailed discussion around the CEG element expected.
- 2.40. **IM** stated that this is useful, but should not be entirely prescriptive.
- 2.41. **CA** stated that the content is comfortable, but suggested that it would be helpful to engage the TPP community on what to do when fraud is identified (when it has left the customer's account), how the current industry processors can be used to trace that. **CA** added that this would be a useful build to include for good customer outcomes.
- 2.42. **EC** stated that one of the short term key deliverables coming up (middle of the month) is the upgraded Cyber Fraud sharing platform and also the fraud standards that have been progressing with industry parties. **EC** agreed that the mechanisms and guidelines need to be elaborated on, but the key intention around the modus operandi of fraud (not specifics to a fraud case) is shared through the cyber and fraud sharing platform in the same way as has been traditionally shared re cyber activities. **EC** added that this has been through security and fraud working group.
- 2.43. **EMB** asked if onward provisioning could be considered so that the TPP Guidelines articulate how registration of ASPSPs should be processed, especially when using a TSP account. **IG** agreed with this point stating that further work was required (including for example, engagement with the ICO) on the CEG Guidelines, so that the best process is drawn up. **IG** stated that there are 300 TPPs in the ecosystem asking basic questions and these are being dealt with over the phone and manually.
- 2.44. **IM** referred back to CA's point about being prescriptive, stating that most of these cross-pollinate with the CEGs and the standards, especially considering onward provisioning and an on-boarding process from an AIB perspective when a new TPP joins.
- 2.45. **IG** thanked all for comments, stating that this piece can be minuted by the secretariat as approved.

**APPROVAL - IESG\_APR\_LOG\_054 - The paper describes voluntary guidelines for TPPs, building on the existing Operational Guidelines (OG). It provides operational, security, data management and testing guidance on best**

*practice. This content derives from pre-existing published guidance and is presented in a consolidated format to make it easier to access and use by TPPs.*

## 2.g SCA DELAY

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- 2.46. **IG** introduced this paper as an AOB item, stating that the SCA delay discussion is pertaining to the two announcements published by the FCA, there was no intent to provide a paper. **IG** stated that there had been no request to put this on the agenda, but it seemed sensible to discuss this with 14 September 2019 being imminent. **IG** opened the floor to **KC** to add anything from an FCA point of view or if IESG members had any questions about the announcement.
- 2.47. **FR** wanted to know if there might be another cliff edge that entities will be working towards, and whether there is any mitigation around that. **KC** explained that the expectation from the FCA is not that entities should not introduce SCA on 14 September 2019, but that a phased approach over six months would be accommodated up to 14 March 2020. **GL** stated that the inference from the published FCA statement is the opposite of this understanding, stating that the announcements encourage entities not to implement SCA until the TPPs have transitioned their customer base unless they have the full suite of payment APIs available by 14 June. **KC** explained that the FCA is saying that, but additionally, the point of the adjustment period is to allow TPPs to migrate their customers, the phased time frame has been introduced because TPPs will be on-boarding their customers. **KC** added that putting this on the transparency calendar means that TPPs understand that they can phase the approach in the event that if TPPs are concerned that they will not make the 14 September deadline. **GL** stated that the message is misleading and will need to be re-communicated. **KC** explained that the email communication issued on 09 August by Jonathan Davies explains that for online banking, customers will notice the phasing in period of the adjustment period and that there will be no additional adjustment period after that. **KC** added that there are two communications – the email of 09 August and an update to the website. **IG** asked if this was also part of the distribution strategy for some of the trade associations to put the same communications out in the event that there were questions. **KC** agreed, explaining that the FCA would be happy to pick these queries up bilaterally. **GL** stated that on a conference call with the FCA on 03 September and there is a miscommunication because the message was different, there is an expectation amongst the TPPs that where the ASPSPs have not met all the mandatory requirements by 14 June, they would have an additional six months transition of customers to the APIs and that the APIs should be completed by 14 September 2019. **KC** explained that there is still an expectation to introduce SCA on a phased approach and not waiting till 14 March 2020, the FCA are aware that some TPPs need the extra time to migrate their customers and that this should be done on a phased approach basis, as opposed to waiting till the last minute.
- 2.48. **IG** asked if there is anything the OBIE should be doing, for example, to the transparency calendar. **KC** requested that as much information as possible should be put on the transparency calendar regarding the adjustment period and expectations. **IG** asked if it is worth OBIE sending out a reminder email to all the ~ 75 companies that are engaging with the OBIE. **EC** explained that this conversation has taken place at every DWG; the ASPSPs are fully aware of the transparency calendar and there is an on-going process for keeping that communication to the broader community. **EC** added that there are entries on the calendar where not using our standards communicating to the TPPs, the messages the FCA to the banks has led to an on-going update to the ASPSP calendar and this has helped TPPs.
- 2.49. **IM** stated that TPPs who are not using the OBIE standards, but updating the transparency calendar is valuable. **IG** echoed **IM**'s statement.

## 3.a AOB – P7 REVERSE PAYMENTS

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- 3.1 **IG** introduced a quick update on reverse payments, stating that this is not about the principle, but about timelines and when this can be expected back at IESG. **EC** stated that this is in consultation and in parallel, development of

some candidates at the moment. At the end of the consultation period, this will come back to IESG for approach endorsement, followed by implementation. In terms of coming back to IESG, **CM** stated that an update on solutions and propositions have been scheduled and expecting that an update should be available for the next IESG which is on 17 October 2019. **IG** agreed, stating that progress is important and that an update should be provided at the next IESG.

## 3.b AOB – GOFCoE AND JOINT TASK FORCE ON PSD2

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- 3.2 **GL** stated that the PSD2 Joint Task Force had a meeting to discuss the relationship with National Competent Authorities and Flexibility. There will be a new statement issued in the task force in the next 24 hours (05 September 2019) which will be twofold:
- 3.2.1 Calling on the European Marketing Authority to make clear to the National Competent Authority yet to buy into an adjustment period that it is required as a lot of marketing Authorities are awaiting guidance from the EBA.
  - 3.2.2 Whilst the conversations with standards groups in Europe on the 90 day re-authentication have been on-going, there is yet to be a regulatory update via EBA to enable some of these options to remove the issues that have been brought forward.
- 3.2 **IG** stated that the adjustment period will not change and any change to the 90 day re-authorisation would need to be impact assessed from the OBIE point of view. **CM** stated that other options from a Technology and Standards point of view to remove some of that friction, so this is happening in parallel, although not of this is mandatory.
- 3.3 With regards to GOFCoE, **GL** stated that NESTA Open Up Challenge 2020 is underway and Miles Cheetham is developing the conversations to bring the data set into play. **GL** stated that most of IESG members would have been contacted by the GOFCoE team to kick off these discussions. **GL** stated that the centre is applying for a £22 million pound central government grant for which the application is due on 18 October 2019. **GL** added that there have also been capital pledges from the private and public sector (including the CMA9). In terms of next steps, **GL** stated that the data should be finalised by December 2019 with a view to making data available in Q1 of 2020 to support the challenge. **GL** stated that the idea is that an anonymisation protocol is written, following which credit bureaus will be working to add on the account number and credit file for the customers on an anonymised basis to ensure the data set has a rich database to appraise the algorithms to the new process models.
- 3.4 **IG** stated that one of the challenges was whether this could fit with the timelines for the NESTA challenge. **SM** asked about the anonymising of the data set, questioning whether this is generating synthetic or real data. **GL** anonymisation will not be perfect and the process would be to anonymise enough to run science to be able to repair it and for regulated actors to be able to develop it for the NESTA challenge.
- 3.5 **IG** wished IESG members good luck for 14 September, hoping that positive messages will be sent out to the media, including the huge amounts of work done and potential to move on from here and interesting topics to talk through on the next meeting such as onward provisioning. **IG** thanked everyone on the phone and in the room for their time.
- 3.6 **IG** closed the meeting.