

Meeting Minutes

Meeting details

Meeting date: 30 July 2020

Meeting name

Implementation Entity Steering Group (IESG)

Meeting time

10.00 – 13.00

Meeting location

Microsoft Teams Virtual Video Conference

Scribe

Sally Chiwuzie

Classification

Public

Name		Role	Attendance
Alan Ainsworth	AA	OBIE – Head of Policy	Yes
Bill Roberts	BR	Competition and Markets Authority (CMA)	Yes
Candy Ma	CMA	OBIE – Office of Trustee	Yes
Carly Nimmo	CN	HMT	Yes
Caroline Ambrose	CA	Barclays Bank	Yes
Chris Michael	CM	OBIE – Head of Technology	Yes
Daniel Ehreich	DE	Bank of Ireland	Yes
David Beardmore	DB	OBIE – Head of Ecosystem (Guest)	Yes
David Fineberg	DF	OBIE – Head of Monitoring	Yes
Ed Colley	EC	OBIE – Programme Director	Yes
Faith Reynolds	FR	Independent Consumer Representative	Yes
Gary Sheen	GS	Tesco Bank	Yes
Gavin Littlejohn	GL	Fintech Representative	Yes
Genevieve Marjoribanks	GM	PSR	Yes
Ghela Boskovich	GB	Fintech Representative	Yes
Hetal Papat	HP	HSBC	Yes
Imran Gulamhuseinwala	IG	OBIE – Trustee/Chair	Yes
Mark Chidley	MCH	Independent SME Representative	Yes

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Nicola Patricia McCleery	NPM	Danske Bank	Yes
Robert White	RW	Santander	Yes
Roy Hutton	RH	Allied Irish Bank	Yes
Sally Chiwuzie	SC	OBIE IESG Secretariat	Yes
Thear Sabri	TS	Electronic Money Association	Yes

Apologies

Name		Role	Delegate
Daniel Globerson	DG	Royal Bank of Scotland	Stephen Wright (SW)
Helene Oger-Zaher	HOZ	Financial Conduct Authority	Joseph Levene (JL)
Ian Major	IM	TPP Representative	N/A
Matt Cox	MC	Nationwide Bank	Chris Jones (CJ)
Phillip Mind	PM	UK Finance	N/A
Simon McDougall	SMD	Information Commissioners Office	Jenny Vega Destello (JVD)
Stephen Smith	SS	Lloyds Banking Group	Richard Rous (RR)

No. Agenda item

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

- 1.1. **IG** welcomed IESG members to the Microsoft Teams virtual video conference, and expressed gratitude to see everyone safe. **IG** started by clarifying housekeeping rules – stay muted unless speaking and use the ‘raise hand’ feature or side chat which himself or **SC** would pick up. **IG** stated that there has been no request for AOB but welcomed IESG members to request via the chat.
- 1.2. **IG** advised IESG members that other than minor amendments from **FR** and **MCH**, there was no feedback received on the minutes. On that basis, **IG** approved the minutes from 24 June 2020.

APPROVAL – IESG_APR_LOG_078 – June IESG Minutes - IG approved the minutes from the June IESG.

- 1.3. **IG** welcomed Genevieve Marjoribanks (**GM**) from the PSR, adding that James Whittle from Pay.UK will join the next IESG meeting. **IG** added that **FR** would be leaving early and was keen to participate in the discussion about the End User Risk Committee (EURC) update and on that basis, the agenda might be shuffled around if required.
- 1.4. **IG** kicked off the discussions about open actions on slide 22, inviting IESG members to walkthrough.
- 1.5. With regards to action #462 (*Programme update – The IESG July agenda to include a general discussion on the ecosystem including aggregate and overall growth of the ecosystem*), **IG** explained that this is an agenda item in the pack and David Beardmore (**DB**) will present. **IG** stated that on this basis, the action can be closed.

- 1.6. With regards to #463 (*CM to share and / or clarify the Pay.UK / CASS feedback from a legal perspective*), **IG** explained that this relates to clarification required by CASS with regards to concerns on GDPR. **IG** turned to **AA** for clarification. **AA** confirmed that the issue raised here and at PMG was whether the data being shared with the TPP – an error code - is covered by CASS rules and does not require consent, therefore requiring no consent steps to be built into. **AA** added that he asked CASS to confirm that these have been covered by way of a letter which they could not oblige, however, the OBIE and CASS exchanged emails and CASS have explained that if IESG members (or any other stakeholders) have issues, to address CASS directly. **IG** explained that this could be closed and asked if any ASPSPs or anyone else has any issues and would be contacting CASS. There was no-one. **IG** confirmed that this action can be closed and asked **AA** to confirm to CASS that there were no queries arising out of IESG on this.

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ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2020_301_462	24/06/2020	DB	Programme update – The IESG July agenda to include a general discussion on the ecosystem including aggregate and overall growth of the ecosystem.	Update 30/07 - Closure agreed. Update 27/07 - This is included in the pack for noting - agenda item 2.a. Propose to close.	30/07/2020	Closed	30/07/2020
IESG_2020_301_463	24/06/2020	AA	OBIE Standards V3.1.6 – CM to share and / or clarify the Pay.UK / CASS feedback from a legal perspective.	Update 29/07 - Closure agreed. Update 27/07 - Alan provided an update to PMG (21/07) as follows : CASS confirmed that they engaged extensively with the CASS participants on the error codes proposal as part of the workshop, and had not identified any GDPR issues as none had been raised in that forum. In addition, the CASS agreement was reviewed and has been assessed to be compliant with the guidelines. Any residual questions regarding this should be raised with CASS. Propose to close.	30/07/2020	Closed	30/07/2020

1.c PROGRAMME UPDATE

1.c.i OBIE STATUS REPORT

- 1.7. **IG** asked **EC** to comment from an OBIE perspective on slide 24, stating that it seems to be on track in accordance with the Roadmap.
- 1.8. **EC** stated that the team has started putting out (MI) consultations, which have been issued both to TPPs and ASPSPs in the broader community, along with early recommendations for thought at the TDA. For the rest of the activities, **EC** stated that all are moving along as expected.
- 1.9. With regards to the NESTA challenge, **EC** explained that the PR campaign has picked up; the prize giving and debate are on schedule; cost is in line with budget allocated.
- 1.10. **EC** explained that the OBIE team has processed the first batch of allowable deferral requests from the CMA9, with some being granted. **EC** added that the OBIE team is yet to receive all the deferrals following the last IESG for CASS for the second phase of P7 (refunds). **EC** stated that this would be covered in more detail during the CMA9 status report.
- 1.11. **EC** paused for questions.
- 1.12. **GL** referred to the bottom of the OBIE standards piece in key updates, asking if the acronym 'LSB' stands for Lending Standards Board within the CRM /CoP piece. **EC** confirmed and pointed out that the consultation out there has been issued and it covers everything expected.
- 1.13. **IG** stated that there will be an update on that workstream in due course. **IG** added that upon approval of the Roadmap, the team met with LSB and ICO who agreed to be supportive of each other's aims.
- 1.14. **IG** asked **AA** when an update on CRM / CoP is feasible. **AA** agreed that this could be done in the September IESG.

**ACTION – IESG_2020_301_464 - AA to write CRM / CoP update paper for the September IESG.
Due Date – 30 September 2020.**

- 1.15. In terms of the planning work detailed on slide 24 – *TPP side customer protection – scope and deliverables have been agreed with the Trustee*, **FR** stated that she spoke to the team about this, explaining that this is not at a form where it is ready to be signed off and was keen to see that this is a draft until there is something that stakeholders are able to commit to in terms of scope. **FR** explained that she recommended that the team looks at the EURC work as a series of risks have been raised, many of the mitigants for which are the TPP side protection with reference to a code. **FR** asked that this is given more air at IESG.
- 1.16. **EC** stated that majority of these issues have been picked up but explained that the EURC report would be debated during the allocated slot within this session and if that presents further work, then this will be picked up as an action.
- 1.17. **FR** stated that there are risks that EURC are yet to work their way through which might be mitigated by the TPP side customer protection. **IG** reassured that this was not time barred.
- 1.18. With regards to sweeping, **MCH** stated that the status has been discussed at bilaterals and requested an update.
- 1.19. **EC** turned to **CM** and **AA**. **CM** explained that the team is working on a sweeping evaluation paper as per the roadmap. **CM** stated that the paper is due to go out for consultation in November 2020 and discussions are being held at the bilaterals. **CM** explained that this will go out for consultation in September. **MCH** asked if this is when people outside CMA9 get to see it. **CM** confirmed.

1.20. **IG** stated that meeting at bilateral level is one of the steps required. **CM** confirmed to **MCH** that the bilaterals are not limited to just the CMA9. **CM** added that before anything goes to formal consultation, the team needs to ensure that there is a good hypothesis of the proposition/evaluation/standard. **CM** stated that some of these discussions are not necessarily with everyone.

1.c.ii CMA9 STATUS REPORT

1.21. **IG** moved on to slide 25, stating that **EC** will say a few words and then hand over to the CMA9 should they choose to comment, adding that these are CMA9 words and **EC**'s traffic lights.

1.22. In terms of key highlights, **EC** explained that the red RAG statuses in 3.1.5 represent the stage in planning so does not mean an en-masse miss, but that the detailed plans that are being worked on have not yet been provided by the CMA9 member. **EC** stated that he is expecting a better colour if not green as the next cycle approaches. **EC** asked IESG to note that there is a persistence with BOI who are in directions, whilst the others have been deploying changes since the last IESG in June 2020.

1.23. In terms of availability, **EC** explained that the change is getting accommodated without the degree of unavailability as previously, adding that this is a good indication that the CMA9 are implementing change in a safe way and getting majority of that change implemented without affecting TPPs on that availability.

1.24. **IG** asked if any of the CMA9 want to comment or if the non-CMA9 have any questions. There were none.

1.25. **RR** highlighted that on 3.1.4, LBG have now agreed a plan with the OBIE. **RR** stated that where the blurb states that LBG have submitted deferral requests, this has now been agreed and therefore should be green. **EC** explained that this is amber because there are some risks outstanding with Covid19 delivery impact. **RR** accepted.

1.26. **IG** stated that one of the things highlighted is that not everything in 3.1.4 could be deferred under the process. **EC** confirmed, adding that deferrals were mainly granted on P7, deferrals could be granted and still be amber on 3.1.4.

1.27. Broadly speaking, **IG** thought that there was great progress judging from slides 25 and 26.

1.28. **IG** moved on to slide 26. **IG** stated that the layout has changed since the last IESG in June. **EC** stated that discussions at the last IESG prompted changes to the presentation of the dashboard. **EC** drew attention to 3.1.4 which contains P7. **EC** referred IESG members to the left-hand side of the dashboard which shows the current implanted version of the standard – the functional standard by the CMA9. **EC** stated that the 3.1.4 banks that are highlighted are those that have implemented the first stage of P7 though some have implemented in its entirety. **EC** explained that the second point is around FAPI which is only one version and simply states if this is a pass or fail. **EC** added that if it is not a pass, then it shows the projected date for passing that security profile and whether it is on track or at risk.

1.29. **EC** picked on Barclays and stated that they are currently on 3.0 and planning to get to 4.0 at the end of August, hence the amber status. **EC** stated that if there is more certainty around completing those dates for 3.1.4, then they will be green again.

1.30. With regards to CEG, **EC** stated that the team is in the process of gathering 3.1.4 attestations and understanding whether the 3.1.4 elements of the CEG have been implemented; **EC** stated that this will prompt discussions around further CEG changes if they have not yet been implemented sufficiently.

1.31. **DF** added that there is very little in CEG between 3.1.3 and 3.1.4 – there is a small refunds element, but very little in those versions.

1.32. **IG** thanked **DF** and stated that for those do not close to the programme, this may feel like a lot of detail, but it is helpful as it is an accurate snapshot as to where everyone is and is not too bad a picture. **IG** stated that he spent

time with the team looking at how it has all developed and hoped that the next IESG, there will be more ambers going green and greens completing.

- 1.33. **IG** paused for comments.
- 1.34. **GL** stated that layout of Slide 26 is helpful. **GL** wondered how OBIE is using this data, explaining that it would be good to publish in the environment for anyone operating in the TPP role to track status and understand next steps. **GL** stated that he would like to see this method of comms used in broader context.
- 1.35. **IG** was happy with the compliment / endorsement. **IG** stated that it is best to take this away and discuss with **EC** but wanted to understand if this is essentially captured within the transparency calendar. **IG** added that it would be good for **EC** to discuss this at PMG prior to discussing with **IG**. **EC** stated that the transparency calendar does not show this because it does not show when the CMA9 would intend to get certified for certain aspects. **IG** asked that this is something to discuss at PMG and come back to **IG** before committing to making it publicly available. **IG** thought **GL**'s request had value and was reasonable.
- 1.36. **EC** explained that there are 70 odd ASPSPs which this slide does not reflect. **GL** stated that the process undergone here is *best practice* and would like to see, from a regulatory perspective, the whole market and the TPP side brought into this context. **GL** added that both TPP's and ASPSP's should be FAPI compliant and efficiency is to be gained from standardisation and conformance. **GL** agreed that it is a process, but it is the right way to deliver this. **GL** added that he would be seeking to encourage the regulatory authorities to adopt this process.
- 1.37. **EC** stated that with regards to FAPI for TPPs, very few have run the tool, and none have attempted any certification. **EC** added that because the CMA9 are going through their certification processes, the OBIE has been out to all the live to market TPPs to gauge where they are with regards to their FAPI implementation. **EC** stated that if there are firms which are certified for FAPI on the ASPSP side, the TPPs must be interacting with them in a credible way, but this does not mean they are certified for FAPI.
- 1.38. **GL** thought that the fact that the CMA Order has created some behaviours that are required of the CMA9 have enabled an example to be shown to the rest of the market – ASPSPs and TPPs. **GL** stated that it is the correct approach and he will do everything to promote this on a permanent basis. **GL** stated that it saves cost and effort and even though it was unknown at the beginning of the journey, it is critical that this is learnt from.
- 1.39. **IG** highlighted that the CMA9 are moving forward on this, adding that NatWest Group is showing some leadership on this and HSBC on the FAPI side. **IG** stated that by the next IESG, a lot of the greens will turn blue. **IG** mentioned that Dansk, Nationwide and Barclays are not far off.
- 1.40. **IG** thanked the CMA9 for co-operation in getting this done and looked forward to next iteration.

1.c.iii KEY PERFORMANCE INDICATORS (KPI's)

- 1.41. **IG** moved on to KPIs from slides 26 onwards. **IG** did not expect to go through all the slides but asked **EC** to pull out relevant highlights.
- 1.42. **EC** recognised that even though the MI is not quite back to where it was pre crisis, it is clear that it is getting back into the change implementation rhythm, adding that the average availability has improved and response times are hovering around the recommendations in the operational guidelines albeit it there being some CMA9 who are still working on change to improve response times. **EC** added that the successful KPIs have grown and are now back to pre-crisis level; whilst there was a lull during the main peak of the crisis, PSU levels are going back to where they were.
- 1.43. **EC** paused for questions. There were none.

- 1.44. **IG** commented that the trend is moving in the right direction and feels like following discussions with **EC** and the CMA9, there is a drive to keep the trend moving.
- 1.45. **IG** asked about JIRA tickets which feels stubbornly high. **EC** explained that the numbers in absolute terms are hovering around the 230-240 level for some (slightly increased in prior months), but now, although there is a considerable number of tickets during particular months, those tickets are cleared and the stock level is reducing. **EC** stated that the level of tickets that were there from previous and new implementations has created a situation where there are new TPPs moving to their new stack, which is generating tickets, but the tickets are getting cleared.
- 1.46. **EC** stated that a couple of the CMA9 (RBS for example), are clearing tickets. **EC** added that RBS tickets as of today (30 July 2020) are zero and would like other CMA9 members to get there. **EC** confirmed that this is the first time since 13 January 2018.
- 1.47. **IG** asked if **HP** wanted to pick up. **HP** reminded IESG members that this was discussed at the last meeting. **HP** stated that HSBC is aware of the situation and working hard to bring the ticket numbers down. **HP** added that there is a steady burn down of 50 tickets per month with new ones coming in at around 30. From a customer perspective, **HP** was confident that Q3 will see a continuous drop to 20 tickets per month where HSBC has historically been.
- 1.48. **IG** stated that a refresh of the charts over the summer would be good. **IG** was interested in knowing which of the TPP volumes are live, even though it is interesting to see this information by brand. With regards to PSU adoption, **IG** stated that this needs to be refreshed based on how IESG want to discuss this. With regards to the authentication efficacy chart, **IG** stated that this is complicated and there is a new workstream designed to unpick this and as this workstream matures, it would be good to de-complicate that.
- 1.49. **FR** referred to the chart on slide 45 as concerning for some brands. **FR** stated that Nationwide appears to be 57% of AIS and authentications abandoned for some brands. **FR** understood that stakeholders are doing as much as possible to address the problem but asked to know if more can be done as this is terrible user experience which will undermine consumers adoption.
- 1.50. **IG** did not want to take the wind out of what **EC** or **CM** might want to say by way of a response, but explained that the early indications coming from the Root Cause Analysis (RCA) workstream which looks at authentication is that the whole user experience including the re-authentication has issues with consistency and approach which the CMA9 have raised themselves – there were issues of polling for example. **IG** added that the workstream led by Matt Wallace would say that this is work in progress. **IG** added that there is full co-operation from the CMA9.
- 1.51. **EC** added that apart from the CMA9, there is great input coming in from a variety of TPPs with fundamentally different propositions and so it is still early days to conclude as it will take time to go through all the data.
- 1.52. **FR** talked about refreshing some of the PSU slides and thought that there could be a better visualisation of that data. **IG** stated that this is being driven by how the information should be represented to the ecosystem; there are discussions with the CMA9.
- 1.53. In response to **FR**, **CJ** stated the following in the chat which **FR** noted:

Chris Jones - Faith - just to respond. We talked to OBIE in the RCA bilateral that we think the data is not representative of the actual experience and indeed that reported by TPPs. We are working to improve the data quality so we can get an accurate view of the experience.
- 1.54. **RR** stated that the problem statement needs to be structured with care, and on that basis, had a few observations. **RR** stated that with regards to the large percentages of authentication abandoned calls, there can be a range of customer and TPP behaviours that go into that (e.g. polling would sit). **RR** added that sometimes customers will get to a screen and forget their log in, connection would time out, etc. – therefore, there are a lot of numbers that

affect the direct channel to a great extent and **RR** expressed an interest in exploring the next level down to understand what sits within each of those definitions.

- 1.55. **FR** agreed with some of **RR**'s explanations, stating that one of the recent interesting consumer discussions around 90-day re-authorisation was the fact that some consumers are not using biometrics and the banks log-on processes can be ineffective. **RR** added that there are some TPPs who are not yet using App2App and the browser journey is less effective with a lower success rate.
- 1.56. **IG** explained that in terms of updates from the team, there are so many factors that must be taken into consideration when dealing these numbers. **IG** was happy to see a thoughtful and unemotional run at this. **IG** was pleased that the workstream is called RCA because that is the level of detail required to unpick what is going on. From **IG**'s perspective, there was no value in placing too much emphasis on slide 45 and agreed with **EC**'s point is right – this can be seen from the ASPSP or TPP side as the root cause will not always reside with one party and customers become familiar with it and put up with bad journeys. **IG** was positive that the team would get to the bottom of this.
- 1.57. **IG** stated that **AA** should think about when an update on RCA can be brought to the group, without deciding about that on the spot.
- 1.58. **GL** stated that without trying to suggest that there is causality, there is correlation with the blue colour on slide 45 and the CEG non-conformance on the earlier side, stating that it is, in fact, an exact overlay – the organisations amongst the CMA9 with lots of blue are the ones that are not confirmed.
- 1.59. **IG** thanked **GL** for the observation, stating that Matt Wallace and his team are looking at it or otherwise will make sure he is aware of this.
- 1.60. **EC** gave a quick update on slide 53 – social media / website analytics. **EC** stated that since the app store was launched with good media and social media promotion, the digital channel has had a good uptake in that month which has continued into this month. **IG** explained that it is not an actual app store, but a library / catalogue of all ASPSP and TPP propositions that are available via open banking. **DB** added that there are 81 different products and services right now. **IG** encouraged all to look at it, not least because it will drive the metrics.

2.a ECOSYSTEM DEVELOPMENT

- 2.1. **IG** turned to slide 54 and handed over to **DB** who leads from OBIE. **IG** explained to **DB** that the request was – *'what is OBIE doing to further the development of the ecosystem?'*.
- 2.2. **DB** introduced the paper and moved IESG members to slide 56 - the main purpose the briefing. **DB** explained that this explains the objectives that have been set and how they are being delivered, including upcoming activities and priorities over the next few months.
- 2.3. On slide 57, **DB** explained that this pulls back to the Order, part of which talks about facilitating the growth of a dynamic intermediary sector, including PISPs and AISPs. **DB** stated that this is the exact remit for the team he leads. **DB** stated that the growth of a dynamic ecosystem is evidenced in two ways:
 - 2.3.1. The increasing number of participants in that ecosystem; and
 - 2.3.2. The final measure is the growing number of PSUs that are using products and services that are powered by Open Banking.
- 2.4. **DB** explained that there are several things the team do:
 - 2.4.1. Providing support for the journey, particularly the onboarding; and
 - 2.4.2. Providing support through various changes.

DB explained that some of the CMA9 are having conversations with teams which provide services like support through FAPI and other part of the journey.

- 2.4.3. Educating different audiences and promoting the benefits of Open Banking.
- 2.4.4. The marketing team communicate those messages through websites, periodic updates etc.
- 2.5. **DB** turned to slide 58 explaining that the vision is to see more PSU's accessing and taking advantage of Open Banking. **DB** explained that the numbers have grown throughout the year except for the month of May which was down to the Covid crisis. **DB** looked forward to the next milestone which will be to hit 2 million users.
- 2.6. **DB** explained that on slide 59, he pulled out a few bullets to illustrate the way that the OBIE team is going about some of the objectives described earlier, adding that he meets with **MCH** and **FR** fortnightly to understand the challenges being faced by the SME and consumer audiences. **DB** explained that a lot more support has been provided to the forums that they run, listening carefully to the challenges and being useful.
- 2.7. **DB** informed IESG members that the team also speaks at external conferences, zoom seminars, etc., referring to a seminar which **FR** is attending with the One Organisation. **DB** explained that some of the webinars have to do with:
 - 2.7.1. Issue focussed - vulnerable customers or payments.
 - 2.7.2. Sector focussed events to try and bring about the smaller ASPSPs – pre-paid cards, e-money institutions.
 - 2.7.3. Vertical markets – the most successful being with government organisations (to be touched on slides towards the end).
- 2.8. **DB** stated that his team have been working with **AA**'s team on the P17 – Customer Evaluation Framework (CEF).
- 2.9. **DB** added that Miles Cheetham (a member of his team) is supporting the NESTA Open Up Challenge as this sits within the ecosystem team.
- 2.10. Following on from some of the points made by **EC** and **IG**, **DB** stated that the Power of the Network was something that was picked up in the middle of the crisis and has been useful in being able to highlight how Open Banking has been able to use product and services to deal with the crisis. **DB** explained that there have been two objectives around the Power of the Network:
 - 2.10.1. A spotlight into highlighting what is going well (**IG** has used a lot of these examples with meetings with governments and other agencies to demonstrate how the benefits of Open Banking can be applied semiofficially in a Covid environment; and
 - 2.10.2. The app store which promotes the products and services which has been welcome by a variety of media.
- 2.11. On side 60, **DB** thought this was a useful overview of the first half of the year in terms of growth of the total number of participants, including those in sandbox and live production (ASPSPs and TPPs).
- 2.12. **DB** explained that the team is focussing on the TPPs because we have many of the smaller ASPSPs who have not yet enrolled. Trying to find ways to encourage them to join the ecosystem and one way is to go through the TPPs. With regards to the figure of 85 to 83, **DB** explained that there are a number that did not renew, so that is correct. With regards to the number in production – 78 in the ASPSP market and 188 in TPP market. **DB** reminded IESG members that his team provides support to new joiners and explained that new participants that have joined (ASPSPs, TPPs and TSPs). **DB** explained that there is support on the TSPs, encouraging them to come on board.
- 2.13. With regards to the high volumes reported every month, **DB** walked IESG members through the slides that talk about the numbers.
- 2.14. **DB** referred IESG members to the propositions on slide 61. **DB** talked about the technical service provider – the function and the reasoning to reach the long tail of ASPSPs –the usual process is to go out to consult with a number of them in order to understand what support they need to help them to help the OBIE to facilitate increased sign ups. **DB** mentioned DMS, thanking the CMA9 for signing the appropriate paperwork, following on from which attention can be turned to the wider ecosystem.
- 2.15. On slide 62, **DB** explained that the team talked to representatives of different audiences, educating them on the specific benefits, tailoring use cases so that they understand what is relevant. **DB** explained that the most

successful engagements have been through governments and government banking services who provide services to the individual banking services. **DB** explained further that a series of learning sessions were set up with individual departments (ranging from 1 to 50 departments) and there was a real interest in payments. **DB** added that HMRC, DVLA have been interested in Open Banking. **DB** stated that there was an invitation to talk to heads of departments which is imminent.

- 2.16. **DB** explained that there were some really beneficial use cases – some of the organisations have come back with specific use cases and the OBIE team is now helping to set up pilots and proof of concept products, e.g. looking at the use of Open Banking products to cut down user error and embedding the data flows for payments for DVLA and the real time information for HMRC.
- 2.17. **DB** concluded by asking IESG members to watch the development as the team continues to promote the use of Open Banking. **DB** highlighted that the final slide highlights events run by the organisation to support the ecosystem – for example, the Implementation Standards Forum, The Testing Working Group, Programme Management Group, Technical Design Authority. **DB** also talked about events that are being organised and attended. **DB** closed by stating that the purpose of the team is there to support the onboarding, participation of the journey, educating and communicating these messages to the wider world via social media and the website.
- 2.18. **DB** opened for questions.
- 2.19. **GL** thanked **DB** for the great update. **GL** referred to slide 60 of the Ecosystem Development presentation, specifically referencing the metrics of market participation, stating that there seems to be a discrepancy between this slide and the graphic TPP funnel slide that comes in the pack. **GL** explained that it stated that 398 TPP firms have enrolled as opposed to **DB**'s slide which recorded 500 + TPP firms.
- 2.20. **DB** explained that this is the entire ecosystem including sandbox and live and he will double check the numbers as pulled by same people. **DB** will get back to **GL** after the meeting.
- 2.21. **IG** explained that the distinction usually comes where one entity is acting as an AISP and a PISP and there is also the distinction between the number of entities vs. authorisations.
- 2.22. **EC** explained that it is usually around the totality of people who are in the sandbox as an enrolment might go through but whether they participate in the sandbox and production afterwards is another question. In discussing the distinction, **EC** stated that the number that are in production is greater than those that have live to market propositions.
- 2.23. **IG** asked **DB** to do a short email detailing that reconciliation as stakeholders like to quote a solid number with confidence.
- 2.24. **DB** stated that the infographic on live to market numbers will be published the next day (31 July 2020).

ACTION - IESG_2020_301_465 - Ecosystem Development - DB to send IESG members a reconciliation email re the difference in figures between the metrics of market participation on the ecosystem development slide and the TPP funnel slide that appears in the programme update.

Due date – 20 August 2020

- 2.25. **BR** observed that there are so many TPPs.
- 2.26. **BR** stated that there is a focus on aggregate numbers of PSUs who are using Open Banking and was trying to work out how many SMEs were using Open Banking as the population of 6 million is quite small, this might represent a high penetration figure.
- 2.27. **BR** asked what the OBIE is marketing or selling to the government, wondering if it is a generic explanation of what Open Banking is, and if so, why the commercial providers of the benefits are not doing this themselves.

- 2.28. **DB** explained that the government departments wanted to know how Open Banking would work in their world, thereby triggering OBIE to show specific use cases that might help them. **DB** explained further that it is a concept being sold to them and what they choose to do with that is up to them. **DB** added that the OBIE team will not get involved in the commercial delivery of any pilot but will offer generic advice on how to proceed.
- 2.29. **IG** explained that the commercial departments in the market raise concepts with government departments and having been sold the genre of the idea, they turn to OBIE for education. **BR** recalled that the court services and serious frauds office wanted to know if they could get ASPSP status to investigate suspicious accounts. **DB** stated that at a webinar earlier that week, an entity was asking how Open Banking AIS provider could be used for a track and trace programme.
- 2.30. **IG** stated that the other thing they find helpful is for the OBIE to tell them what the regulatory APIs can do and where they stop; and if their ideas are of interest but sit outside of the regulatory API's then the OBIEs can advise them on who they need to find to be able to do this. **DB** stated that there is still some ignorance as the specifics of what is and is not possible is still a grey area.
- 2.31. With regards to the TPPs, **DB** stated that they are not all TPPs as some are smaller entities - e-money, travel cards, etc. **DB** stated that at a conference a few weeks ago, there were a lot of basic questions about Open Banking and a lot of these entities are finding these education activities beneficial.
- 2.32. **IG** asked about the number of SME. **DB** explained that there is more work to be done in determining the number. **EC** explained that to get a good estimate is very difficult, stating that at the moment, the data received from the CMA9 it is impossible to determine if they are SMEs and which are consumers, but this will resolve itself over time.
- 2.33. **GL** stated that there are 4.1m SMEs in the UK that are dormant or semi dormant. **GL** explained that these use cloud-based account platforms for their financial records (as there is a legal obligation to keep financial records) and these are linked to Open Banking and so there is a much higher penetration per capita within the SME marketplace than the consumer. **BR** stated that this was the reason for being surprised that the numbers look so low.
- 2.34. **GL** explained that one or two of the companies in the UK have the potential to use Open Banking and given the current financial crisis – the health pandemic, the importance that has been placed on trying to improve the capability of companies in financial record keeping to enable appropriate up to date files has been heightened.
- 2.35. **DB** agreed with **GL**, stating that the benefits have been highlighted through the power of the network and this is a continued area of focus.
- 2.36. **MCH** thanked **DB** for presentation and identified one of the areas of collaboration with him and **DB**. **MCH** stated that the SME forum has been developed since the team came on board and there have been wider events and reach. **MCH** talked IESG members through an inaugural meeting held on 20 July, including representatives of small businesses, TPPs, CMA9 member, cloud accounting firm, CBI, BOE, small business commissioner to drive out potential benefits for SME's. **MCH** explained that this helps with explaining the need for cloud accounting as this is needed to ensure that cash flow works. **MCH** mentioned that there is an emphasis on end user benefits – this means that financial aid will be available for people seeking support and advice. **MCH** concluded by stating that there has been positive collaboration with **DB**'s team driving out real benefits for the wider ecosystem.
- 2.37. **FR** was keen that IESG members have a rolling update on this so that there is more context with things like the KPIs on social marketing. **FR** thought it would be good to have a dashboard of what is going on in terms of ecosystem activity as there is a lot of things happening and perhaps this paper could be refined to replicate an update on an ongoing basis.
- 2.38. **IG** thanked **FR**, explaining that efforts in this area have been sporadic and **DB** has managed to pull all of this together into a single point of contact for the various queries coming in. **IG** stated that once this is mature, OBIE

would then be able to think about how to create an update on this. **IG** was confident in the team's direction of travel.

2.b THE REFUNDS DATA SECURITY AND CONSUMER PROTECTION WORKING GROUPS UPDATE

- 2.39. **IG** introduced this paper explaining that this is an update on the two working groups which emanated from the CMA's revisions to the OBIE's revised Roadmap:
- 2.39.1. Refunds Data Security;
 - 2.39.2. Consumer Protection with the PSR.
- 2.40. **IG** handed over to **AA**.
- 2.41. With regards to the Refunds working group, **AA** explained that there has been one meeting so far containing a broad group of stakeholders – CMA9, nonCMA9 and the other expected constituencies. Rather than trying to get to jump in with solutions, **AA** explained that the group is trying to get a recognition of the scale of the sharing of sort code and account number data (whether through PIS refunds or some other mechanism such as direct debit or credits) and then working through what the (potential) detriment could be from sharing and what controls could be put in place to protect that data. **AA** explained that this analysis is ongoing and will be shared sometime in September. **AA** added that the intention is to use the analysis to create a report to take findings back to the CMA.
- 2.42. **AA** paused for comments or questions.
- 2.43. **IG** mentioned that in discussions with **AA**, he stated that if anyone not on the group wants to see the materials, this could be shared. **AA** confirmed that **SC** or himself can share information.
- 2.44. **IG** said that the group is working constructively, it is not intended to last for very long – 3 meetings. **IG** stated that the first meeting is to introduce, the second to review solutions and the third to land solutions.
- 2.45. **AA** introduced the second working group – consumer protection. **AA** explained that **IG** and Chris Hemsley (the MD of the PSR) were asked to explore consumer protection for PIS and for inter-bank payments more generally. **AA** explained that there are other pieces of work going on, for example, Payment futures which is a UK Finance sponsored piece of work which is going into research phase.
- 2.46. **AA** explained that the PSR has launched *a call for input* around the PSR strategy which has the potential to include consumer protection. **AA** explained that his team is trying to figure out is where this working group sits so the group can concentrate on interbank payment for PIS but within the context of other work so that this can be fed into and taken from. **AA** stated that at the point where **IG** and Chris Hemsley figure this out, there can be a ToR created ahead of the first working group.
- 2.47. **AA** asked if **GM** had any input.
- 2.48. **GM** agreed that this is complex. **GM** explained that on 28 July 2020, the PSR put out a forward look strategy (forward look for 3-5 years) which is focussing on 3 areas:
- 2.48.1. Innovation
 - 2.48.2. Competition; and
 - 2.48.3. Choice for consumers
- GM** sees this work as rolling into the strategy work as it sits neatly within the ranks of what will fit with the PSR strategy. In terms of the call for input, **GM** explained that they are not calling it that, but seeking people's thoughts as this is just a proposed strategy. **GM** explained that the 5-minute video is explanatory and calls for action.
- 2.49. For everyone's comfort, **IG** explained that the parties that are involved in trying to determine the scope include UK Finance, Pay.UK, HMT and the FCA. **IG** explained that this will widen, however, the aim is to try not to duplicate work that has already been done elsewhere.

2.50. **IG** opened for comments. There were none.

2.c END USER RISK COMMITTEE (EURC) UPDATE

2.51. **IG** introduced the EURC update on slide 65, an overview from **AA**, beginning with a refresher about the objectives and how he expects stakeholders to opine or respond.

2.52. **AA** explained that this was set up because some IESG members raised the need to think of risks to consumers and end users, adding the EURC was set up to take a view of what these risks might be.

2.53. **AA** explained that there are 34 potential risks identified by the group and the group had to find a way of deciding which of the biggest of these should be presented to IESG for consideration. **AA** added that this is an EURC committee view of (not OBIE view) along with suggestions for what IESG members might need to do. **AA** added that some of these aspects of the risks are being dealt with within the Roadmap, others could potentially be on the Roadmap but are not and some risks may be outside of scope of the Order and PSD2. **AA** stated that there are 3 categories to those risks.

2.54. **AA** introduced a discussion about the process. **AA** stated that firstly the EURC looked at an agreed approach to rate the risk (top right being most important and bottom left are not urgent but on the radar for addressing in the future). **AA** explained that the risks debated the most were in the medium category to ensure that they do not move to the high category.

2.55. With regards to deciding which risks go forward, **AA** explained that one category of risks was looked at. **AA** referred IESG members to slide 69 (the overview of the 9 data risks) – a bundle of data risks that were looked at.

2.56. **AA** stated that the points addressed were:

2.56.1. Control of data

2.56.2. Accuracy of data

2.56.3. Redress

2.57. **AA** explained that from the 3 categories of risk, all 9 data risks were categorised. **AA** stated that the next step was to have a conversation about how these risks would be rate. **AA** referred to the definitions of the risks, hoping that it was clear and comprehensive to IESG members. **AA** hoped to take IESG members through the risks that were rated medium.

2.58. **AA** explained that sometimes it was difficult to look at one risk in isolation, hence a bundle of 3 risks being brought to IESG. In looking at the control of where the risks go, **AA** explained that sometimes they are within the CMA Order and PSD2, and other times, they are not but the risk remains the same and hence are bundled together.

2.59. **AA** moved on to discussing the control of data risk and why the consent and access dashboard risk is being brought to IESG.

2.60. **IG** thought the discussion was clear but wanted representation on PIS /AIS at EURC. **AA** stated that there were PIS risks on the log, but the EURC decided to focus on one area to make the risk discussions more manageable. **AA** added that AIS is more current.

2.61. With regards to representation, **AA** stated that it constitutes all IESG constituency - CMA9, non CMA9, consumer and SME reps and TPP communities are all represented on the EURC committee.

2.62. **IG** requested a quick overview of the risks.

2.63. **AA** discussed the first of the set of 3 risks:

- 2.64. Control of data - harm caused by an inability for consumers to control what data is shared and with whom - access consent dashboard – poor quality or unavailable. **AA** explained that this has been expanded upon. **AA** added that while some of these have a Roadmap item to address, the committee was keen to get clarity on whether all the areas of risk would be dealt within the scope of that Roadmap item. **AA** explained further that there were 3 specifics identified within this risk.
- 2.64.1. The first is around 4th party – if an entity is not in the PSD2 perimeter and onward sharing data with another organisation, that organisation today is not covered by the dashboard systems on the consent / dashboard leave. There is a potential risk that the benefits of the dashboards are not being felt by the consumers because of 3rd parties not providing AIS. The question from the EURC to IESG is whether this should be included within the scope / action of that Roadmap item.
- 2.64.2. The second is similar – the only data that is considered within scope is *payment account data*. While there may be other data, it would be beneficial for there to be dashboards for the consumer but is not within the scope of A7 (should it be?) .
- 2.64.3. Consent dashboards (TPP side) – how do we ensure that we get consent dashboards to a level that it is helpful for consumers and end users as at the moment, they vary in quality.
- 2.65. **AA** recapped by stating that there have been 3 areas identified within this first risk, a lot of which is to do with expansion of the scope of the current Roadmap items to cover the areas identified within this risk. **AA** opened the floor for initial questions.
- 2.66. **SW** expressed support for a consultation on this area, explaining that the lack of clarity in the ecosystem around 3rd and 4th agent relationships raises risks for consumers as well as ASPSPs. **SW** cited an example - when there are cases where a party needs to be contacted urgently (e.g. due to fraud), contact is urgent. **SW** explained that there have been cases where it has taken a long time to contact the relevant party. Without this clarity and the contact associated with it, **SW** stated that there is an increased risk that ASPSPs will suspend 3rd parties. **SW** added where there are 3rd parties coming through other 3rd parties and /or aggregators, the wrong party might be suspended.
- 2.67. **IG** confirmed that **SW** is on the EURC, explaining that he wanted to ensure that the text is consistent with his words or if the argument is that it has not been described correctly or not gone far enough. **SW** stated that it needs to be expanded upon and there needs to be a replication for PIS as well as AIS.
- 2.68. **RR** agreed with **SW** stating that it merits attention.
- 2.69. **FR** agreed that more work needs to be done and that it is important to get onward shared parties on dashboards. On the other aspects of this risk, **FR** stated that consent dashboards are just as important as access dashboards, adding that there is variability in the market; in terms of the work that Open Banking is doing on the Roadmap (consent analysis dashboard), it would be helpful if this risk could be considered there – understanding and mitigating and perhaps including it in A12. **FR** added that with regards to getting some traction for A12, an option of a code (or similar certification) and getting TPPs to think about how they deliver consent dashboards. **IG** reminded IESG members that A12 is TPP side customer protection. **FR** said that is where are considering if a code of conduct is required for TPPs.
- 2.70. **IG** moved the agenda along to the next of the 3 risks.
- 2.71. **AA** stated that for the second risk, 3 have been bundled together.
- 2.71.1. 17 (traceability of data when it is onward shared)
- 2.71.2. 13 (lack of clarity about whether FOS will deal with complaints around misuse of data and how it would work and when it is outside the PSD2 perimeter – will FOS deal with this?)
- 2.71.3. 31 (what happens when it is outside the PSD2 perimeter and not a regulated participant?)
- 2.72. **AA** talked about the questions that were shared out these risks – what about onward sharing outside of the PSD2 perimeter? How often is data shared outside of the PSD2 perimeter? When there is a problem, what does / should

happen and whose jurisdiction does this sit within? **AA** asked if there is a way of extending protections (Open Finance question?) **AA** stated that there is a need to consider mitigating actions in IESG.

- 2.73. **AA** turned to **GL** and **GB** to ask if this has been articulated correctly. **GL** stated that it is a good start, stating that **FDATA** have been keen to see a system of customer redress that has been tested in the market, adding that while there has not been a disaster in the market, it can be synthetically tested. **GL** stated that if anything went wrong, there will not be a co-ordinated way to deal with it and all participants would do whatever they want. **GL** explained that this requires collaboration between actors and **OBIE** dealing with a range of actors is the best place to address the problem.
- 2.74. **FR** stated that there are some practical things that Open Banking can do, adding that the first is to ask whether there is data outside of data sharing in the PSD2 perimeter. **FR** explained that as part of the Consumer Evaluation Framework, there is a keenness to see data collected with regards to how TPPs are facilitating businesses downstream. **FR** would like to see 3rd parties not providing AIS form part of phase one of the CEF.
- 2.75. **FR** stated that there is a query around making DMS more available. **FR** thought that there might be a role for **OBIE** to write to the regulators to escalate the issues.
- 2.76. **AA** asked **CJ** to articulate what he wrote in the side chat.
- 2.77. **CJ** explained that this is going back to the previous risk around data sharing and thought it was useful to hear **SW** and **RR**'s view and practical examples of fraud. **CJ** stated that they are supportive of this in principle but wanted to ensure that the group would be dealing with something that might be a true risk. **CJ** thought it was good to hear these examples.

[30/07 12:00] Chris Jones

Useful to hear the practical examples from Stephen Wright and Rous, Richard. We also are broadly supportive of encompassing this risk around TPNPA more fully but believe we would benefit from clear and actual examples being captured such as Stephen's to ensure we deal with what is happening on the ground rather than something which is a concern about what PSU's might perceive.

[30/07 12:08] Faith Reynolds

Some TPPs don't update when a consumer logs in. I think there is some confusion about the number of times they can refresh the data.

[30/07 12:12] Chris Michael

Real time push notifications were on the API EG as a recommended functionality, on the agenda at EBA API WG as a proposed premium API and on OBIE list of candidates for premium APIs. Unfortunately, this is rather complex in regard to allowable Art 10 exemptions

[30/07 12:13] Stephen Wright

Increasing the 4x day for customer not present refreshes would impact ASPSP capacity and performance

[30/07 12:14] Chris Michael

Stephen Wright not if the TPP is only getting a delta. However, the best tech solution is push.

[30/07 12:18] Faith Reynolds

We still have a series of other risks yet to be presented to EURC, so we are making our way through them.

[30/07 12:19] Faith Reynolds

I think it's important that we do look at how risks can be mitigated through the existing roadmap. And then I agree that there are other risks those outside of the Order/Roadmap. I do think there is a role for us as IESG or Imran as Trustee to escalate those risks to other parties, like the FCA/ICO etc.

- 2.78. **IG** invited **AA** to walk through the final risk.
- 2.79. **AA** explained that the risk is that the data being shared is either incorrect or interpreted wrongly, resulting in consumer harm because they receive the wrong product or are misled. **AA** stated that to the committee's knowledge this is not on the roadmap. On this basis, **AA** stated that the question is how will the extent to which this might be a risk be known. **AA** asked if firms do anything to monitor that the data presented to consumers is correct and up to date and how is this risk mitigated. **AA** stated that from the EURC point of view, there was a keenness to understand if IESG members are collectively comfortable. **AA** opened this question to IESG.
- 2.80. **GL** stated that presumably, these are regulated actors and not 4th parties. **AA** confirmed. **GL** thought that this would be part of their supervision. **GB** explained that one of the questions was on refresh / accessibility and performance of the APIs, adding that the part that is technical is not just being a regulated 3rd party - the frequency, regularity and consistence of access.
- 2.81. **SW** stated that if the customer is not present, 4 requests for data can be done, however, if the customer is present, the request can be made as many times as they want. **SW** stated that there are no limitations to customer refreshes, and he would not want to change the automatic refreshes and there is no issue with getting the latest data possible if present.
- 2.82. **GB** explained that if the customer present, there is an understanding that the data presented is real time and has just been refreshed. **GB** stated that for notifications and prompts, the other side of that point is whether the tech is dependable and consistent, and the connection would be mitigated but there is still a probability that that might not be accurate. **GB** explained that part of the conversation with the group was the quality of the technology and the requirement for a TPP to be supervised to reach a standard. **GB** wondered if it was about having certification that the TPP is complying to the standard of accuracy vs. are they capable of receiving accurate data or is that chain being updated.
- 2.83. **FR** stated that from personal experience, her apps do not match her banks especially shortly after payments have been made. **FR** thought that perhaps there is the other issue of TPPs wanting push notifications and not having to pull. **FR** added that the 4 options a day granted per day to check a customers account and do a refresh but does not allow real time alerts.
- 2.84. **FR** thought that there are other QA assurance issues around what is shared with providers. **FR** stated that she has had mismatching information between her app and the bank. **FR** was worried that there is the potential for misleading here.
- 2.85. **FR** stated that there are two risks raised into this – one risk about the refreshing of data and the other (though less likely but needs to be discussed) is incorrect data being passed through. **FR** added that the risk is quite low but there is a question around whether anyone does QA.
- 2.86. **GB** explained that inaccurate data might be related to the ability to refresh only 4 times a day and understanding the correlation between the two might help solve the problem with regards to the ability to refresh.
- 2.87. With regards to the risk around refresh, **HP** stated that it was different from the risk that **FR** raised around the difference between customer present and customer not present. Apart from technical glitches, **HP** was concerned that this should not happen. **HP** separated the customer not present position which is now increasingly being thought about as the commercial space where there is more of an expectation of a framework to be set up.
- 2.88. **GL** stated that he sits on the advisory board for the Berlin group and the banks drive the supply side of API's. **GL** stated that at the May Task Force meeting, the bank representative for the advisory board came forward with a proposal to move to push delivery where there is a change. **GL** added that it takes out of scope for PSD2 as none of the data shared will be subject to regulation and none of the risk model or liability of PSD2. **GL** explained that

whilst this is an elegant technical solution, it goes into GDPR and out of financial services which is not the right path. GL added that there must be a regulatory change and not just a technical perspective.

- 2.89. **IG** wanted to say a few words about what to do with this. Firstly, **IG** was not sure how the EURC would play out, but it has proven to be a valuable and collaborative forum as it is hard, but to get down to a meaningful list to bring forward is hard. **IG** explained that the nuances are complex and yet managed to articulate. **IG** added that the role of the EURC is ongoing, with the question being, what happens with these risks without going into a solution space. **IG** stated that he would like IESG members to take stock of these risks and do some analysis to look at each risk and determine which are in scope of the Order and the roadmap. **IG** explained that the reason for that is that the workstreams can be influenced to incorporate or take account of these risks. **IG** explained another category are in scope of the Order but not necessarily on the Roadmap. **IG** was keen not to enhance the scope of the Order or enable scope creep, which the OBIE will be taking up with the CMA. **IG** stated that these may not necessarily result in new Roadmap items but there will be sensible and collaborative discussions. **IG** mentioned the final category of risks – these are outside the scope of the Order and there has been a struggle with what to do with these as the mandate of the Order cannot be expanded. **IG** explained that the role of OBIE and IESG is to carefully articulate what those risks are and then escalate to those entities or regulators for whom they sit within the perimeter of, and in the event that they cannot be identified, to escalate to the regulators so that they are cited. **IG** added that it is important that they are explained in a clear way that gives some sense of materiality, detriment and maybe (one to be wary of) opining on solutions.
- 2.90. For the next IESG, **IG** stated that it would be good to have categorised risks that have been escalated by the EURC and have a discussion with IESG on what to do with each one. **IG** reiterated that none will be ignored – it will be a case of reacting to them because they are within the scope of the Order and / or Roadmap and if not, determine what to do with them.
- 2.91. **IG** opened the floor to opinions on approach to proposed next steps.
- 2.92. **RR** had a question but stated that **IG** answered - he was interested in understanding what can and cannot be done within the scope of the CMA Order, adding that remedies can be mandated if they are to do with the CMA9, but with regards to TPPs, the OBIE's hands are tied. **IG** stated that this has always been a struggle and **FR** talks about creating a code, however, this is not within the mandate of the OBIE. **IG** stated that the OBIE are in a position to talk with a degree of insight and experience as to what could perhaps go into a code and there is a good position in the stakeholder community to be representative on that, but this would fundamentally be something for the FCA. **IG** explained that some of the risks sit within the Order, and others outside and the aim of IESG should be to escalate to the right people. With regards to what good practice for TPPs, **IG** thought that FCA would be considering this as part of their Open Finance work. **IG** added that there needs to be some analysis that breaks down these risks into their constituent parts and then try to determine who is responsible for them and seek to escalate to them.
- 2.93. **MCH** stated that this has been a useful and collaborative exercise which is well informed. In **MCH**'s view, he explained that if the IESG is charged with delivering the Order, it cannot go beyond the scope of the Order. However, **MCH** explained that there is an incumbent responsibility on this group to do something with regards to the 3 categories mentioned by **IG**:
- 2.93.1. in scope of the Order and Roadmap
 - 2.93.2. in the Order but not the Roadmap
 - 2.93.3. Outside both.
- MCH** stated that there is a responsibility on the group where it identifies risks on the end users to draw attention to the regulators. **MCH** was sure that the regulators are thinking of these things and because of the crisis, prioritisation for resource constraints is a complicated thing. **MCH** stated that clarity should be brought on this, encouraging people to go into the detail of it. **MCH** and **FR** support that approach.
- 2.94. **RW** echoed **MCH**'s opinion, explaining that it has been a useful activity which gives a good business case for some of the items on the Roadmap. **RW** explained that it is important to see this type of articulations of the problems

within the 3 categories mentioned. **RW** added that this should continue and should help the ASPSP and TPP communities to think about things differently.

- 2.95. **IG** explained that historically, when these kinds of risks have been looked at, they have been set aside and the right thing would be to deal with what can be dealt with and then escalate appropriately.
- 2.96. **IG** proposed a short break if there is no further comment. **IG** commented that none of the regulators who might potentially be on the receiving end of the prioritisation of these risks have not said anything, but thought that perhaps, it might be a private matter.

3.a AOB – DIGITAL IDENTITY

- 3.1 **IG** accepted an AOB requested by **RR** on digital identity.
- 3.2 **RR** stated that LBG is working with a number of third parties and some of the IESG members and would like to see if there is something that OBIE can help with or should the body who have been speaking bring a proposal forward.
- 3.3 **IG** explained that *digital identity* is also known as *attribute validation* and is the use of the Open Banking rails with problems to determine certain attributes associated with individuals which include elements and components of digital identity, and it is not within the scope of the Order or of PSD2, however, it is within the remit of Open Banking to encourage the dynamic ecosystem of AISPs and PISPs, and therefore, the OBIE will play the role of educating and supporting any participants who want to engage in that. **IG** stated that it does lend itself to premium APIs and if there is meaningful demand from the ecosystem to try and support a forum for this discussion to happen (whilst mindful of resource implications and subject to certain criteria), the OBIE can play a role in that.
- 3.4 **IG** stated that he has had discussions in the past and encouraged more to come to the fore and if likeminded individuals can come together, the OBIE can help to facilitate this.
- 3.5 **RR** was happy with this and stated that for those that are interested, there might be a separate session outside of IESG. **IG** stated that the OBIE would be willing to try and orchestrate some timings for a session, adding that if anyone interested should drop a note to the secretariat.
- 3.6 **RW** indicated interest but was concerned about multiple conversations and on that basis, suggested a conversation with James Whittle of Pay.UK to avoid duplication. **IG** was not keen on massive fragmentation. **RW** explained that therefore the conversation with Pay.UK should happen.
- 3.7 **GL** stated he spoke to the team at DCMS that lead on the UK strategy for identity and tried to articulate the fragmentation risk that is playing out with 8 - 10 different initiatives in hand at the moment for financial services led digital identity in the UK alone. **GL** noted that the Swift and Open ID Foundations on identity (which Santander were heavily involved in) have merged into the EKYC platform which has led by one of the key actors in the FAPI working group. **GL** stated that their description of what the task they do is the *tooling* and not the *ruling* – effectively looking for governments to identify what would be acceptable identities and build the technology language in the background that would then enable to co-joining of the FAPI security standard between regulated actors through to the end customer which would reduce phishing attacks. **GL** stated that he would be keen to see that added to by OBIE standards.
- 3.8 **IG** stated that this is a complicated landscape. **IG** stated that the core principle is that the OBIE believes in open standards and harmonisation is better than fragmentation because it supports consumer interest and is easier to regulate. **IG** stated that where there are other likeminded individuals, they should come together. **IG** added that a good starting point is to bring together within IESG and / or the Open Banking ecosystem those that are most interested in it.

- 3.9 **SW** echoed the points raised by **RR** and **RW**, adding that OBIE has a role to play in at a more fundamental level of having a common standard for sharing customer attribute data and customer information. IG confirmed that this is as opposed to relying on digital identity – almost like what gov. is trying to break off, but smaller elements associated with it.
- 3.10 **IG** was pleased with the short, albeit unplanned conversation. **IG** stated that if anyone who has an interest in these conversations should let **SC** or himself know, at this point, the plan would be to pull together a few meetings to see what this means.

ACTION – IESG_2020_301_466 - Digital Identity – IESG members who are interested in participating in a further conversation about digital identity should let SC / IG know by email. SC to facilitate a Microsoft Teams meeting. Due Date - 30 September 2020.

CONCLUSION

- 3.11 **IG** agreed with IESG members that the August IESG meeting should be cancelled as it is typically a month where many individuals cannot make it due to holidays and staycations. IG added that having checked with the OBIE team, there is no impact on forthcoming approvals (Standards).
- 3.12 **IG** stated that the KPI's will be circulated out of cycle, asking if there are any objections to this. There were no objections.
- 3.13 **IG** wished all a good summer break.
- 3.14 **IG** closed the meeting.