Meeting Minutes

OPEN BANKING

Meeting details	**Meeting name**
Meeting date: 17 December 2019	Implementation Entity Steering Group (IESG)
Meeting time	**Meeting location**
10.00 – 13.00	Etc. Venue, Capital 2, Eastcheap, London
Scribe	**Classification**
Sally Chiwuzie	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 (Phone)
Caroline Ambrose	**CA**	Barclays Bank	Yes
Chris Michael	**CM**	OBIE – Head of Technology	Yes
Daniel Ehreich	**DE**	Bank of Ireland	Yes
David Fineberg	**DF**	OBIE – Head of Monitoring	Yes
Ed Colley	**EC**	OBIE – Programme Director	Yes
Faith Reynolds	**FR**	Independent Consumer Representative	Yes
Gavin Littlejohn	**GL**	Fintech Representative	Yes (Phone)
Helene Oger-Zaher	**HOZ**	Financial Conduct Authority	Yes
Hetal Popat	**HP**	HSBC	Yes (Phone)
Imran Gulamhuseinwala	**IG**	OBIE – Trustee/Chair	Yes
Mark Chidley	**MCH**	Independent SME Representative	Yes
Matt Cox	**MC**	Nationwide Bank	Yes
Phillip Mind	**PM**	UK Finance	Yes
Robert White	**RW**	Santander	Yes

Roy Hutton	RH	Allied Irish Bank	Yes
Sally Chiwuzie	SC	OBIE IESG Secretariat	Yes
Thaer Sabri	TS	Electronic Money Association (EMA)	Yes
Vicki Hassan	VH	Danske Bank	Yes (Phone)

Apologies

Name		Role	Delegate
Daniel Globerson	DG	Royal Bank of Scotland	Stephen Wright (SW)
Ian Major	IM	TPP Representative	N/A
Paul Horlock	PH	Stakeholder Engagement, Standards and Strategy	N/A
Simon McDougall	SM	Information Commissioners Office (ICO)	Jenny Vega Destello **(JVD)** (Phone)
Stephen Smith	SS	Lloyds Banking Group	Richard Rous **(RR)**
Will Curley	WC	Tesco Bank	Gary Sheen **(GS)** (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 to the last IESG of 2019, advising that the agenda is intentionally light, including the normal housekeeping section, three papers on Standards for approval and the bulk of the discussion focussing on the first phase of the consultation on the roadmap.

1.2. **IG** confirmed from the secretariat – **SC** that non-contentious revisions were received and incorporated; the revisions are not included in the pack due to late receipt, however, the approved version will include requested amends which will be published on the website as usual.

APPROVAL – IESG_APR_LOG_061 - November IESG Minutes - IG approved the minutes from the November IESG.

1.3. **IG** moved on to discuss the open actions, inviting IESG members to walk through from slide 25 *(Note: action updates are documented on page 4, with additional comments captured below).*

1.4. By way of an introduction, **IG** stated that some of the actions would remain open as they will more naturally be captured as part of the proposed roadmap consultation summary under agenda item 2.e.

1.5. With regards to #228 *(Programme Update – MI)*, **IG** stated that this action will remain open; this will be discussed within the context of the roadmap.

1.6. With regards to action #229 *(Dispute Management System (DMS) – Hogan Lovells Report)*, **IG** explained that this would be covered as part of agenda item 1.c – programme update.

1.7. With regards to action #330 *(P14 Evaluation of Efficacy of Account Comparison)*, **IG** stated that a letter has been prepared by **AA** and the OBIE team and discussions were being finalised (also within the roadmap discussions); this would be discussed at the IESG meeting on 16 January 2020.

1.8. With regards to action #331 *(Name of account holder)*, **IG** explained that upon investigation, it was evident that name of account is available, therefore, this has been resolved, but **EC** would walk IESG members through during the programme update section – action closed.

1.9. With regards to action #332 *(Availability – planned / unplanned maintenance),* **IG** explained that the new format of the chart aids transparency in terms of what has been agreed re planned and unplanned maintenance. **IG** stated that it is not in the pack due to issues with the KPI's; however, the format has been agreed. **GL** asked who agreed the change in the metrics. **EC** confirmed that it was not a change in the metrics, but a portrayal of the metrics so that it is a more transparent view of planned/unplanned availability. On this basis, **IG** stated that the action can be closed.

1.10. With regards to action #333 *(update on P7 – reverse payments)* and #334 (update on *90 day re-authorisation)*, **IG** stated that these are contained within agenda items 2.a, 2.b and 2.c; and on this basis, these actions can be closed.

1.11. **IG** was satisfied with the status of the actions and invited comments / feedback; as there were none, **IG** moved the agenda on.

Meeting Minutes

ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2019_301_228	17/10/2019	**EC**	**Programme Update - MI** - Improving the MI process and information quality, including eliminating synthetic authentication requests whilst providing TPPs and TSPs with critical real time information on aspects such as availability, performance and quality to be presented as an agenda item at the next IESG (19 November 2019) with all suggestions from IESG members to be sent through to EC by 01/11.	**Update 17/12** – This was discussed as part of the roadmap consultation; agenda item 2.e. Action to remain open during the consultation. **Update 07/11** - This will be incorporated as part of the revised roadmap proposal and consulted upon. **Update 18/10** - Memo re this action was sent to IESG members via the Secretariat with responses requested by 01/11.	16/01/2019	Open	
IESG_2019_301_229	17/11/2019	**EC**	**Dispute Management Systems (DMS)** - Hogan Lovells report to be distributed to IESG members by EC following OBIE internal governance reviews.	**Update 17/12** – This was discussed as part of the programme update; agenda item 1.c. Action to remain open during the consultation of the roadmap. **Update 13/12** – Verbal update to be given at the December IESG **Update 19/11** - At the November IESG, IG advised that this action should be left open until all clarifications are concluded at the bilaterals and other conversations. **Update 07/11** - Report distributed to IESG members by email on 07/11. Propose to close.	16/01/2019	Open	
IESG_2019_301_330	17/11/2019	**AA**	**P14 Evaluation of Efficacy of Account Comparison** - As discussed at IESG on 17 October 2019, IESG members to provide stakeholder representations to the Trustee, copying in Alan Ainsworth by 25/10.	**Update 17/12** - IG stated that a letter has been prepared by the OBIE team but discussions were being finalised and this would therefore be carried forward to the IESG meeting on 16 January 2020. Carry forward. **Update 19/11** – At the November IESG, AA stated that four representations have been thus far received and there appears to be a level of consistency to these representations,	16/01/2020	Open	

				there would be an update at the next IESG of 17 December 2019. Although the deadline for representations was 25 October 2019, late submissions would be accepted. Update 11/11 - Review of the stakeholder representations is in progress. Carry forward to the December IESG.			
IESG_2019_301_331	19/11/2019	EC	**Programme Update - Name of Account Holder** - EC to prepare a one-page update on the status of account holder name by provider. This will be an update at the December IESG.	**Update 17/12** - Verbal update given during the programme status review section. Action can be closed. Update 05/12 - EC to give verbal update during the programme status review section at the December IESG. Propose to close.	17/12/2019	Closed	17/12/2019
IESG_2019_301_332	19/11/2019	EC	**Programme Update - Availability - planned / unplanned maintenance** - EC to produce an availability chart that shows planned and unplanned maintenance.	**Update 17/12** - It was agreed at IESG that this can be closed. Update 10/12 - This chart was sent to IESG members with the updated KPI's on 26/11. This will be included in the IESG packs going forward and it will be published on the Open Banking website early 2020. Propose to close.	17/12/2019	Closed	17/12/2019
IESG_2019_301_333	19/11/2019	CM	**P7 (Reverse Payments)** - Following approval of the functionality to be included in version 3.1.4 of the Standard (due for publication on 23 Dec 2019) - Option A, an update to be provided at the December IESG.	**Update 17/12** – It was agreed at IESG that this can be closed. Update 03/12 - RW API Specification V3.1.4, Customer Experience and Operational Guidelines papers for approval are included as agenda items in the December IESG pack. This covers updates on P7 (Reverse Payments) and 90 Day Re-Authentication. Propose to close.	17/12/2019	Closed	17/12/2019
IESG_2019_301_334	19/11/2019	CM	**90 Day Re-Authentication** - Following the approval of the development of option 3 in version 3.1.4 of the Standard (optional implementation due for publication on 23 Dec 2019) , an update is to be provided at the December IESG.	**Update 17/12** – It was agreed at IESG that this can be closed. Update 03/12 - RW API Specification V3.1.4, Customer Experience and Operational Guidelines papers for approval are included as agenda items in the December IESG pack. This covers updates on P7 (Reverse Payments) and 90 Day Re-Authentication. Propose to close.	17/12/2019	Closed	17/12/2019

1.c PROGRAMME UPDATE

1.c.i   OBIE STATUS REPORT

1.12.   **IG** introduced the programme update section inviting an update from **EC**. **EC** started with DMS, stating that the legal opinion document was circulated; clarification points on the terms and conditions and back to back arrangements with resolver requested by some of the CMA9 are pending. **EC** expected that upon finalisation of this, the action can be closed.

1.13.   **EC** stated that account holder name was verified across the CMA9 post the November IESG, adding that stakeholders need to be vigilant about the way change is communicated to the TPPs to ensure that they understand when new fields are added. **EC** stated that the TPP community struggle with the possibilities that account holder name can be stored.

1.14.   **CA** wondered if it is worth agreeing a universal method for communicating change to make it easier for TPP consumption and interpreting the transparency calendar. **CA** suggested that this could be discussed at PMG. **EC** agreed, but added that the key thing is to ensure that the message is available to the TPPs as agreed with the associations, i.e. predominantly through the transparency calendar. **EC** added that the portals and communications from the services play a part, but that should be secondary to the TPP communication. **CA** stated that if that is the primary method, then this should be communicated to the TPP as there is uncertainty as to a uniform engagement method. **RW** added that process for updating the transparency is not slick, stating that upon completion, it does not always reflect the changes made. **EC** stated that process issues can be looked into. **IG** asked if the OBIE has *'write access'* to the calendar. **EC** stated that the banks have access as well; however, the OBIE ends up transposing most of it. **IG** agreed that it is within the scope of PMG to get the process right. As there were no further comments in the room and on the phone, **IG** moved the agenda along.

1.c.ii   CMA9 STATUS REPORT

1.15.   **EC** began this update by informing IESG members that most of the CMA9 completed final implementations with a few delayed into the new year due to the change freeze restrictions, however, where there are delays, these are only by a week or two. **EC** stated that overall, the CMA9 are progressing their implementations in accordance with the plans agreed with the office of the Trustee, albeit some challenges with Santander (Cater Allen) moving to their new platform. **RW** explained that Santander has started deploying the endpoints and some customers have been migrated, with the others being scheduled to migrate in Q1 2020.

1.16.   **IG** asked for an update on functional conformance. **EC** stated that while some certificates have been issued, a number of the CMA9 are yet to complete functional conformance. **IG** asked if the colour coding used on slide 28 reflects functional conformance. **EC** stated that it will not be marked complete until it passes functional conformance, therefore, the colours do not relate to this. **DF** added that the OBIE team met with **BR** and the CMA9 over the last two weeks, adding that the meetings were generally positive, productive and forward looking with actions agreed on quite a few of the deficiencies. **DF** explained that prior to the meeting, there were gaps in terms of what had been done about the red RAG statuses, and progress is now being made to decide mitigating actions, details of which will be circulated for confirmation of next steps / actions. **IG** found that the meetings were constructive as a lot of the ambers were able to turn green and reds turned amber, and once best effort is established from the banks through this process, then next action steps would be determined. As there were no further comments in the room and on the phone, **IG** moved the agenda along.

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

1.17.   **IG** handed over to **EC**, noting that the KPI information is missing. **EC** explained that the fundamental reason for the gap is that one of the banks did not get the MI in enough time to create and populate the pack, but upon this information successfully passing the challenge process, it will be distributed to IESG out of cycle. **EC** went on to explain that there is very little time, especially with IESG meetings that are closer to the middle than the end of

the month, adding that the January IESG is similar as it is on the 16th. **EC** stressed the need for the CMA9 to ensure that it is right the first time round.

1.18. With regards to upcoming activities, **EC** stated that a couple of the institutions who had deteriorating performance have had that arrested with improved response times showing. That notwithstanding, **EC** commented that this is still not near the benchmark published in the operational guidelines. **EC** stated that there are still a number of large screen scraping communities pending migration before the 14 March end of adjustment period deadline.

1.19. **IG** asked for more details on activities the OBIE is taking to facilitate the transition during the adjustment period. **EC** stated that the OBIE team work closely with the main screen scrapers to understand where they are in the overall customer migration and where they have problems with individual firms, adding that these are picked up in bilaterals or in direct meetings depending on severity. **EC** stated that it is about encouraging and ensuring that the TPPs have started when they say they have and are making the progress that they need to make to ensure the CMA9 and others can safely end the adjustment period and introduce SCA. **IG** asked if it is fair to say that performance is not dissuading any of the TPPs from migrating. **EC** stated that conformance is causing some of the big TPPs to slow down. **IG** asked if this is being set up for a back ended migration which will cause problems in March 2020. **EC** stated that customers will be moved in tranches. **EC** added that there are differences in performances across the CMA9, there is sufficient variation for them to progress their migrations, but this will hit a blocker if performance is not improved by January 2020.

1.20. **IG** stated that this is an important topic to cover in the IESG meetings in January and February, after which there will be no more time. **IG** expressed keenness to take comments from around the room in terms of what they are doing to improve performance and facilitate migration.

1.21. **HOZ** supported **EC**'s comments stating that the FCA will continue to monitor the progress with TPPs and ASPSPs quite closely to ensure that migration is completed within the adjustment period, especially in light of concerns around a number of areas (performance issues in APIs). **IG** sought confirmation that FCA/OBIE efforts are co-ordinated and not being duplicated. **HOZ** confirmed.

1.22. **IG** was interested in comments from the CMA9 regarding issues with undertaking this migration. **MC** stated that there is a natural back ending of migration that will happen with February being the peak month; there was therefore a conscious choice to utilise the adjustment process which was intended to help TPPs. **MC** stated that Nationwide has started to phase the switch on of SCA on to the internet bank, but this has been done initially for customers who are less likely to be using screen scraping propositions. **MC** added that in January and February, the rump of those customer bases would have to be a 100% switch. **MC** explained that there is a crunch period which is part driven by API performance, but also the switch on and imposition of the SCA in the internet banking channel has some risks attached to it for TPPs and businesses because high volume is being driven into the internet bank where SMS's are being spuriously issued because the screen scraping routines are still happening. **MC** agreed that it is a complex situation and API performance needs to be sorted out before February 2020.

1.23. **IG** had not heard of the strategy of phasing SCA and wanted to know how Nationwide would be determining which customers are less likely to use screen scraping. **MC** explained that customer segments that usually log on to the internet banking using a card reader are far less likely to be using TPP type propositions, therefore those have been segmented out into one of five different groups, whereby those that are mobile active and of a certain demographic have been back-ended to the plan.

1.24. **IG** thought this was a sophisticated approach and wondered if it was being replicated by other banks in the room. **RW** stated that from a Santander point of view, there are processes running in the background to understand the intelligence of the customer experience, and it is a similar approach but ramping up in a different way.

1.25. **IG** asked if there is anything that could be done by the OBIE to help the banks facilitate the migration. **HP** stated that there is active engagement to ensure that all the materials required are in place for the TPPs to allow

accommodation of the transition. **HP** added that the dialogue with the OBIE has been very helpful as they ensure clarity in communications.

1.26. **IG** thanked **HP** for the response and opened the floor once more to other comments regarding the co-ordination role for the OBIE. **GL** explained that there are issues with the software as opposed to hardware architecture and anything that can be done to troubleshoot and improve efficiency of the API performance would be helpful. **EC** asked if this in relation to the TPPs, **GL** confirmed that he meant ASPSPs. For the sake of transparency, **CA** stated that some of these statements have come from Barclays as Barclays is looking at ways of making the system more efficient from a hardware / software design point of view. **CA** was confident that there is good dialogue from the TPP. **EC** stated that this is consistent across some of the CMA9 who are looking at optimising the way the architecture is calling each other as well as infrastructural components.

1.27. **IG** wanted to make sure that there are no obvious points being missed, asking **EC** to come back with a status overview of the migration, adding that (as long as it is not commercially inappropriate) it would be helpful to get a sense of what proportion have moved across vs. proportion that are yet to move across. **EC** added that having these conversations with TPPs and the CMA9 would be a good co-ordination activity in its own right.

ACTION – IESG_2019_301_335 – Programme Update – Migration Update – EC to present a migration status overview at the January IESG, this should include a summary of proportion of customers who have moved across.
Due Date – 16 January 2020

1.28. In rounding up the discussions on KPIs, **IG** asked what the next steps are for getting this month's KPI statistics out, adding that this is the second month where they have not been published for IESG. **EC** explained that the KPIs will be sent out of cycle once the outputs have been agreed with the CMA9. **IG** requested that the narrative should cover two months.

ACTION - IESG_2019_301_336 – Programme Update – KPIs - EC to distribute KPI's out of cycle before the IESG meeting of 16 January 2020. The January agenda is to include two months narrative (November and December 2019).
Due Date – 16 January 2020

1.29. **MCH** stated that from a CMA9 (ASPSP and TPPs) and small business consumers, a lot of people have existing services upon which they rely. **MCH** explained this migration could mean that certain people end up losing their services if these things fail by the end of the adjustment period. **MCH** was also conscious that by the time things go back to normal after the Christmas break, it will be the middle of January 2020, therefore a period of that time frame between now and the end of the adjustment period is lost. **MCH** wanted to put down a marker that this is a potentially significant issue for the businesses and if there is no trend of improvement, the roadmap will not inspire confidence for those businesses that rely on these services. **IG** thought it was a fair point, stating that it would be helpful if **MCH** could feed through where things are not working over the course of now and January 2020.

1.30. **RR** echoed the observations about wanting to be able to plan ahead and having the support of the OBIE and TPPs in doing so. With regards to the risk posed to customers using AIS services to do their accounting packages, for example, **RR** wanted to know if with regards to volumes in the AISP scenario the response time can actually make a service fall over. **MCH** explained that the compound effect may mean that the information cannot be refreshed over a 24 hour span, therefore, a day would start without the information being current – cash flow planning might be affected as the service ceases to be fit for purpose in terms of the information which people rely upon it to provide.

1.31. **EC** explained that it is the cumulative effect across all of the CMA9 that has the effect on the TPP and not any individual bank. **EC** analogised with the biggest accountancies who use screen scraping – if added up, the pressure point is whether they can pull back all the necessary data to process the changes.

1.32. **GL** wanted to understand (in light of the go-live date being imminent), what testing has been done. **GL** also wanted to know (especially now that the programme is still at the early stage of the growth pattern for open banking) if there is technology that can be used to test what stage each of the APIs will peak as opposed to having so many in production. **HP** stated that this is not something that IESG members should be trying to solve unless the powers of the Trustee cover that.

1.33. **RW** agreed that **GL** made a fair point, but explained that he is not aware of anything in current traffic coming through that shows that Santander has hit that point yet. **HP** maintained that this is a firm level conversation.

1.34. **IG** agreed with **HP**, stating that this is a regular point of discussion at the bilateral meeting which is held with all the banks; **IG** added that the performance is a lead indicator of where there are issues, but it is being discussed.

1.35. **GL** asked if each firm will know what level they would peak at. **EC** stated that the OBIE looks at the TPP community using information intelligence and expected volume increase; this is not a perfect science but it does portray the volumetric for AIS with the limited volume of payments traffic coming through. **EC** added that traditionally it has been reasonably accurate, and this information is shared through PMG and bilaterally with each of the CMA9.

1.36. **IG** proposed moving on from the housekeeping section unless **EC** had anything else to add. **EC** stated that the volume growth continues, and is expected to go up - currently in the region of 215 million calls from 180 million in the prior month. **EC** added that since the start of the ecosystem in January 2018, the call rate has just crossed a billion. **RW** asked if this is driven by more TPPs or customers of the TPPs or different levels of activities per customers. **EC** stated that it is a mix – more credit cards are being produced, increase in credit for rental agreements and accountancy firms through the likes of screen scrapers are moving large numbers of customers which is creating a significant amount of business traffic on the APIs.

1.37. **IG** moved the agenda on.

2.a   RW API SPECIFICATION V3.1.4 PAPER (INCLUDING P7 – REVERSE PAYMENTS AND 90 DAY RE-AUTHENTICATION UPDATE

2.1.   **IG** introduced three papers for approval, suggesting that these should all be covered at once, adding that these papers also form the basis of an update to P7 (reverse payments) and 90 day re-authentication (**IG** reminded IESG members that 90 day re-authorisation is optional).
       2.1.1. RW API Specification V3.1.4
       2.1.2. Customer Experience Guidelines (CEG) V3.1.4
       2.1.3. Operational Guidelines V3.1.4

2.2.   **IG** handed over to **CM** asking if this has gone through the appropriate levels of governance (specifically TDA). **CM** stated that the RW API Specification V3.1.4 was approved at TDA on 11 December 2019, including a combination of decisions which are being presented to IESG. **CM** added that in addition to an update on reverse payments and 90 day re-authentication, the papers contained clarifications as to what is deemed the MVP for aggregated polling.

2.3.   With CEG, **CM** advised IESG members that the same elements have been incorporated, with additional guidelines, including:
       2.3.1. Credit line should not be included in available balance – compliance with the High Cost Credit requirements; and
       2.3.2. Approved content for TPP guidelines which cover aspects of GDPR and PSD2. **CM** added that the feedback during the consultation was minimal and has been responded to.

2.4.   With regards to the Operational Guidelines, **CM** explained that the change was to incorporate content around security, counter fraud measures, operational excellence and testing which were approved by the Trustee on 17 October 2019. **CM** stated that there were no points of feedback received indicating that there is no concern around this.

2.5.   **IG** opened the floor to questions or comments.

2.6.   **MCH** confirmed his support for the Customer Engagement Guidelines, stating that there had been good engagement with team, adding that it is something that will be developed into helping ASPSPs and TPPs understand the principles better from the point of the customer.

2.7.   **FR** thanked the team for including more direction in terms of guidance and security for P7, adding that it would be great to see fraud issues being pushed more and would like to see this come back to IESG. **FR** added that the CEG could need continuous review as it is evolving. **IG** commented that all the standards need to continue to evolve with learnings.

2.8.   **CA** made an observation about the CEG on refunds; the ASPSP should not disclose that the sort code and account number is shared with the third party. **CA** said that this is because the TPPs would have to disclose this in their consent; the TPPs are AIS and not PIS. On this basis, **CA** stated that it has to be absolutely clear that the TPP always has to share.

2.9.   **FR** referred to a long discussion about what is compliant to PSD2 and GDPR and her understanding is that it is built into the wireframe, and therefore part of the agreement. **CA** said that this cannot be mandated and there is a risk that TPPs can choose whether or not to do it. **RR** stated that this is a concern from a Lloyds point of view as well because if the TPP deliberately or accidently fails to disclose, it is unclear as to who bears the burden of liability.

2.10.   **CM** explained that the clear steer is that any firm that has data on a customer has a responsibility under GDPR and in the spirit of evolving the CEG over the next year, there are going to be use cases for providing better examples of, and clarifications on *what good looks like*; this is not covered by GDPR – it is a PSD2 issue. **CM** added that there are strict rules around GDPR and requirements on all firms.

2.11.   **CA** stated that there are variances around how people are implementing GDPR and where they are storing the information; therefore, one of the unintended consequences is that people are not aware and when they become aware, this creates trust issues within the ecosystem. **CA** wondered if it is worth putting a sentence in the ASPSP journey on the same screen, adding that the OBIE team has said that it is nothing to do with PSD2 but her firm is of the belief that this will mitigate the risk. **CA** added that if this does not work in a year, then it could be taken out.

2.12.   **IG** explained the need for caution because the TPPs are authorised entities of the FCA who know what the requirements under GDPR. **IG** also noted that a bank putting the notification on will not solve the problem, explaining that those who understand it will respect it and those who flout it will face enforcement action. **IG** added that the evolution of the CEG is done in co-ordination with the ICO and there would be no room for TPPs to misunderstand. **FR** stated that it raises questions as to how the guidelines are communicated to TPPs because all they know is that they are not mandatory – a filtering exercise to separate what is important from what is not would help. **FR** added that if the guidelines are being developed by the ICO and they suggest and recommend that sectors and trade associations should create codes of conducts, then these guidelines ought to be codes of conduct. **RR** stated that OBIE should be able to mandate to the TPPs that if they do not follow the guidelines, then there are consequences. **HP** stated that HSBC believe that there should not be a single ubiquitous approach to the Open Banking service; there should be a separate scheme for participants who choose to play by the rules and another open scheme to everyone. **HP** also stated that if we were to create a two-tier approach this would need to be well thought through from a customer perspective.

2.13. **IG** stated that this is a big piece that requires further thought. **BR** stated that the Order does not extend to instructing or obliging the TPPs. **FR** stated that this is why the ICO should set the industry standards so that there is backing that is recognised also by the FCA. **CA** wondered if, as a separate piece of work, a log of the longer term customer consequences could be built. **CA** explained that there are questions around P7, such as who is liable for situations where the customer complains about not realising that their sort code and account number are being stored somewhere, adding that this will encompass DMS.

2.14. **IG** stated that the intent of putting the CEG together is to form the basis of a code of conduct for TPP and ASPSP behaviour as per the ICO. **IG** added that timings are unknown, but the programme should focus on the present. **IG** explained that an advantage of the ecosystem is that there is a pretty good idea of the active PISPs in the ecosystem who may be looking to engage in refunds or reverse payments and as such, it is possible to write a letter to them addressing what their responsibilities are with regards to P7, referring to the CEG. **IG** stated that perhaps, reference could be made to the ICO.

2.15. **CM** explained that this standard kicks off a process of implementation which will take several months depending on what is agreed, during this time the process will be looking at the TPP guidelines. **CM** added that the TPPs have asked for examples of *what good looks like* and there are use cases for this, however at the moment, there are no payments going through. **CM** added that there are a small number of well-known PISPs coming into the ecosystem that cannot use this data at the moment, therefore, there is time to provide the right level of guidance.

2.16. **JVD** contributed from an ICO point of view, stating that any enforcement of GDPR is likely to lie with the ICO. **JVD** added that the work done by the ICO on CEG seems to cover GDPR in some depth and feedback was provided to the OBIE. In terms of the code of conduct, **JVD** stated that the ICO / OBIE teams were supposed to have a meeting which has now been rescheduled, but broadly agreed with the idea of a code of conduct under GDPR. **IG** was happy with this, stating that the take away is that GDPR is reflected in the CEG and the ICO are supportive of this; and if the code of conduct is not ready on time, there are other methods of ensuring that there is compliance. **JVD** added that if there is a situation where there might be infringement of GDPR en-masse, then this needs to be raised at the earliest opportunity.

2.17. **IG** opened the floor for one final round of comments before closing off this agenda item. **MC** stated that the feedback from the Nationwide team is the sheer volume of input required for 3.1.4 far outstrips the ability to input into that work and the time frame given to consume this work was short; **MC** wanted the short time frame of one working day noted, stating that it was very challenging. **IG** appreciated that the programme is further back than intended and it is difficult to find the resource to input. **IG** recognised also that it has been almost two years since the first version of the standards and incumbent on everyone to find the resource to ensure that this is working. **MC** added that some of the material is specialist, therefore it is difficult to get the correct resource and the internal sequence needs to be followed to enable this to be reviewed properly. **IG** asked for comfort to be taken from the comments from the ICO that this has been well reflected within the standards.

2.18. **GL** stated that these papers are marked private and confidential and wanted to know if the three agenda items for approval were suitable for onward sharing. **EC** stated that these would be published on the Open Banking website before the end of week ending 20 December 2019. **IG** added that he is not keen on excerpts of the IESG pack being distributed, and asked if there were any objections to **GL** forwarding on. There were no objections.

2.19. **IG** thanked **CM** and his team and the CMA9 for input on this paper. **IG** formally approved the three papers as detailed below:

APPROVAL - IESG_APR_LOG_062 – IG approved the updated Read/Write API Specification v3.1.4. IG confirmed that the reverse payments functionality is a mandatory requirement on the CMA9 for implementation at the end of June 2020.

APPROVAL – IESG_APR_LOG_063 – IG approved the updated Customer Experience Guidelines V3.1.4 which has been updated to incorporate changes in line with v3.1.4 of the API Specification as well as providing clarifications that have been requested by industry stakeholders and updates driven by industry initiative.

APPROVAL – IESG_APR_LOG_064 – IG approved the Operational Guidelines V3.1.4; the artefact has been updated to incorporate guidelines for TPP's including cover security, counter fraud measures, operational excellence & testing.

2.b   CUSTOMER EXPERIENCE GUIDELINES V3.1.4 (INCLUDING P7 – REVERSE PAYMENTS AND 90 DAY RE-AUTHENTICATION UPDATE

2.20.   This was covered along-side agenda item 2.a. Paper approved. Please see above.

2.c   OPERATIONAL GUIDELINES V3.1.4 (INCLUDING P7 – REVERSE PAYMENTS AND 90 DAY RE-AUTHENTICATION UPDATE

2.21.   This was covered along-side agenda item 2.a. Paper approved. Please see above.

2.d   CUSTOMER EVALUATION FRAMEWORK (CEF)

2.22.   **IG** stated that this paper would be covered as part of AOB instead; however, it was time barred. *(Carry forward to the IESG meeting of 16 January 2020).*

2.e   REVISED ROADMAP – CONSULTATION SUMMARY

2.23.   **IG** stated that **AA** would be leading this discussion, reminding IESG members of the purpose – having provided a Status Report to the CMA, the CMA requested an update to the Roadmap and this consultation is to enable this to be done. The intent of the process therefore is to facilitate the following:
IG, as the Trustee, instructed the OBIE to carry out a Consultation and this marks the conclusion of Phase 1 of the consultation process. Phase 2 will be the next stage which will be discussed at the IESG of January 2020.

2.24.   **IG** stated that he would chair this discussion, but **AA** would walk through / facilitate.

2.25.   **AA** explained that he will give an overview of high level responses received, including a summary of themes that had been picked up. **AA** stated an interest in capturing feedback as the consultation would form the basis of a recommendation to the Trustee.

2.26.   **AA** moved on to explain the process.
  2.26.1.   Phase 1 of the consultation has just been concluded
  2.26.2.   Given feedback on the tight timescales for responding, the consultation would be extended to a further Phase (Phase 2). Stakeholder representations to the Trustee would be required by 10 January 2020 ahead of the next IESG on 16 January 2020; this adds up to twenty six working days of consultation.
  2.26.3.   The Trustee will discuss stakeholder representations made at the IESG meeting on 16 January 2020.
  2.26.4.   Recommendations would then be made by the Trustee to the CMA.
  2.26.5.   A revised roadmap (version 2) will be issued later on this week ending 20 December 2019 in the form of a plan on a page and a Roadmap table in the form that IESG members are used to seeing.
  2.26.6.   It will take account of this report, and further changes discussed during this IESG meeting (changes will be tracked for ease of consumption).

2.27.   **PM** asked whether other stakeholders would be able to see this summary or if it is limited to just IESG members. **PM** explained that it is important to understand context, representations made and whether all representations have been reflected. **IG** stated that this is a fair point, adding that the closer stakeholders are to IESG, the more drawn they can be. **FR** stated that a number of organisations had fed back through the SME/Consumer Reps and it would be helpful to share the summary with them.

2.28.   **RW** wanted to understand the driver for the dates as it feels rushed. **AA** explained that this is to enable agreement with the CMA by the end of January 2020. **AA** stated that he is working under instructions to complete what has been asked of the OBIE by the Trustee to enable the end January deadline, adding that 16 January 2020 is IESG, 10 January 2020 is the Friday before that. **AA** also advised IESG members that there are parallel meetings between OBIE and regulators.

2.29.   **IG** asked for a link to the summary to be added to the plan on a page. **IG** asked for **AA** to confirm that there is nothing in the content that would betray confidentiality and asked IESG members if there is anything contained within that they object to being published.

ACTION – IESG_2019_301_337 - Revised Roadmap – Consultation Summary – AA to include a link to the Response Summary when the plan on a page is sent out, this will include a tracked changes version incorporating feedback from IESG discussions.
Due Date – 20 December 2019

2.30.   **FR** commented on the fact that this document will not be available in the future, explaining that given the level of interest, there is a requirement for transparency; a document repository would create a good audit trail. **AA** thought this was a fair point and worth looking into.

2.31.   **BR** understood the discussions on timing and conversations being compressed, adding that some of these issues have been going round in circles. **BR** wanted to understand if organisations who have issues with the timings are saying that more time is needed or it does not fit into, for example, budgetary requirements. **MC** stated that it is a combination of getting the right SMEs and a satisfaction that feedback has been given on unintended consequences. **MC** wanted to know what the right method of governance is to ensure that these things have been considered. **MC** did not think there should be a fixed end date on consultation.

2.32.   **AA** hoped that some of the concerns are mitigated by explanation during this meeting, asking if IESG members thought that short timescales meant that some aspects were missing. **MC** stated that one working day was not enough to consume the document. **IG** stated that the concern may not be that things have been missed out but instead, that things that they would disagree with. **MC** stated that it is a combination as things might be missed out or fundamental questions not addressed. **IG** referred to **MC**, explaining that the response summary document took account of **MC'**s thoughts on the roadmap as this is the OBIE's review of all stakeholder inputs. **IG** stated that any specific concerns on timescales could be taken offline. **IG** added that there are many items in here which are proposals for evaluation, and therefore not requiring a determination now of how things look but determining the order of activities that the OBIE should undertake. **MC** thought that the second phase was helpful, but there are some thematic concerns that would remain outstanding. **IG** stated that there will be a wide variety of different or opposing views, therefore the thematic concerns may never be alleviated.

2.33.   **AA** stated that there were 64 responses which have been collated and read. **AA** thanked everyone who responded, stating that the responses demonstrate the level of engagement with the ecosystem - there was constructive feedback and positive reviews of varying lengths reflected in some areas of consensus and some disparity between TPP and ASPSPs. **AA** added that some TPPs wanted things done very quickly, while ASPSPs wanted more time and more clarity on the future of the OBIE.

2.34.   **AA** referred IESG members to page eight of the response, explaining that there are three themes that might resonate with stakeholders.

   2.34.1. Stability - this was worded differently per organisation, with some organisations linking stability to resilience of their own platforms. **AA** added that the CMA9 were focussed on having time to get performance

and availability right, including ensuring that things are right ahead of the end of the adjustment period. **AA** explained that some organisations were unsure of what additional functionality was required at this point. **AA** explained that there was a consensus with TPPs looking for stability in terms of connectivity and usability of the APIs. **AA** stated that his recommendation is to allow more time with the proviso that the things that have already been agreed and are in plan will continue with the current timetable, and anything new would be given more time to build, to enable consultation and evaluation on that. Putting it into context, **AA** explained that the last major release was September 2018, the timetable will go into 2021 if evaluations and standards were followed on deliverables such as sweeping – this is a considerable amount of time compared to what was suggested when the original roadmap was put together. **AA** added that his paper reflects the fact that this is complex and the focus needs to be on the adjustment period and migration. **PM** asked where in the document the period of time apportioned to the meaning of stability is spelt out. **AA** explained that it is spelt out specifically under each recommendation which states what the time table is for evaluation, standards built and implementation (where applicable). **AA** stated that in previous documents, the implementations were in square brackets, however, this has been removed to ensure the ecosystem is clear that the results have not been predetermined. From a consumer point of view, **FR** stated that she would like to see customer experience captured in that area. **FR** explained that there are a number of untidy areas from a consumer point of view and to make Open Banking work properly, things that could be considered non-regulatory or non-high agenda items need to be addressed. **IG** concluded – this is not a complete freeze on standards because the natural evolution and change requests associated with standards across all three categories will still continue. **AA** referred to A2, explaining that most deliverables have been agreed and in plan, any regulatory changes that necessitated something to happen within a particular time frame not driven by Open Banking would go through a change request. **GL** asked that acronyms (e.g. A2) are not used during these discussions to enable understanding. **GL** also asked whether the period of stability includes the embedding, and fire drills associated with customer redress and dispute resolution mechanics to ensure that nothing goes wrong. For clarity, **IG** stated that A2 refers to items which are on the existing roadmap. **IG** asked **AA** to pick up DMS as an important part of the Order whilst getting through the three items for discussion, following on from which questions can be taken.

2.34.2. **AA** stated that the other two themes are prioritisation and rationalisation, adding that these contain chunky priorities which are around performance, availability and usability by customers; this is also about focusing on key evaluation items around functionality requested by TPPs in their responses.

2.34.3. **AA** explained that rationalisation is about good housekeeping to enable easy navigation of the plan on a page, preventing duplication and putting in BAU items where they belong on the roadmap as opposed to separating these. **AA** explained additionally that where there is no consensus on activities, it will not be put on the roadmap and if in future, it is required, it will go through full governance at that point.

2.35. In terms of innovation, **RH** asked if the items on the proposed or future roadmap are from the Order or innovations from the market place. **AA** explained that the mandate was to build a roadmap that facilitates the delivery of the Order.

2.36. **AA** thought it would be best at this point to move on to some areas of contention. **AA** identified three potential areas of contention – Trustmark, authentication (root cause analysis mentioned decoupled) and performance benchmarks. **IG** asked for clarification that these are areas of disparity, adding that in finalising recommendations that will be shared in a change tracked document, it would be ideal to discuss responses to DMS, OB standards development in response to regulatory changes including CoP / CRM and *grow ecosystem*.

2.37. With regards to DMS, **AA** stated that version 2.0 has been released and the responses indicated that there is there is a view that time has to be given to judge whether a review or further iteration is required. **AA** explained that the other set of responses were associated with VRPs– a view that in addition to there being a requirement for a methodology around consumer protection, there may need to be a more developed dispute management system that supports VRP consumer protection. **AA** stated that his recommendation is to include dispute management requirements within the VRP evaluation.

2.38. With regards to the OB Standards development, **AA** referred to a legitimate point made that the original Roadmap itemP19 was focused on GDPR and PSD2. In addition, there was a consensus that the Standards must evolve to cater for the implications of CoP and CRM for PISPs, and in particular will require engagement with the regulators and Pay.UK.

2.39. With regards to grow ecosystem, **AA** grouped the responses into two:
    2.39.1. Use case catalogue; and
    2.39.2. Communications
AA explained that people did not really understand the meaning of use case catalogue; however, there was an acceptance that *grow ecosystem* is an activity that Open Banking needs to undertake to ensure that there are participants covering varying verticals (including government services, such as NS&I).
In terms of communications, **AA** referred to responses in favour of having a website, ensuring that there is the right collateral out there - all of these can be wrapped up within OBIE Activities as opposed to having a specific roadmap item.

2.40. In terms of Trustmark, **AA** explained that this is recognised in the Order as something the OBIE should look into, but it has been difficult to define and unless it is mandatory for everyone, there is limited usefulness as it has to be ubiquitous to work. **AA** explained further that in the absence of a consensus, the responses suggested that this is not a priority, adding that this does not mean that it is off the table permanently, but if it was deemed by the OBIE monitoring function to hinder the CMA Order being delivered, then it would need to be looked into in the future, but at the moment, **AA** explained that parking it seems right.

2.41. **IG** asked if Trustmark is a practical consideration as there is insufficient support amongst people who would have to adopt it, and therefore, is not a priority. **FR** stated that from a consumer point of view, there would be disappointment that this is not going ahead as consumer organisations they had engaged with believed that the Trustmark would be helpful in aiding adoption and communicating to consumers. **FR** agreed, however, as she had previously noted a Trustmark is only effective if it stands for something robust that is clearly monitored and enforced. A Trustmark can only be the front end if it stands for something meaningful to the consumer; adding that a code of conduct would have been the right place to start, if there is no appetite for a Trustmark at the moment then the industry cannot be forced. **FR** hoped that the code of conduct would not be discarded and that this was of particular importance. **AA** found **FR**'s comments helpful.

2.42. **IG** asked if the code of conduct is captured in the TPP Side Consumer Protection. **AA** stated that it has been captured; it is still in scope and has not been amended. **AA** added that Open Finance has published today and could be taken forward in that field as it is wider than the Open Banking piece. With regards to **AA**'s language – *'it is still in scope'*, **IG** asked for clarification on whether this means that this is the same as it was described in version 1 and will be the same as the description in version 2. **AA** agreed, explaining that his recommendation will be that this goes forward as was published in November 2019.

2.43. **RR** wanted IESG members to note that they were supportive of the concept of the Trustmark and wanted to know what the TPPs opinion on this was, as he would have expected that this would be something that they would want to invest in. **AA** stated that this did not come through in the responses from the trade bodies or TPPs.

2.44. **GL** explained that at a superficial level, it looked good; however upon examining the detail, it was not clear how the mechanics would work. **GL** added that the fact that the data has flowed using a particular technique does not make the application of it trustworthy and secondly, where a TPP could have all of its umbrella under the Trustmark, it might work, but where some data is via Open Banking API and some data via a modified interface or screen scraped, then from a cyber-risk assurance point of view, this could be revisited when all the ambiguities are resolved. **RH** asked if the ultimate Trustmark is the FCA. **FR** added that it is not a 'no' for Trustmark but a timing and mechanics point of view. **FR** appreciated **GL**'s commented stating that these were issues that were being grappled with and should continue to be grappled with rather than discarding the idea.

2.45. **AA** confirmed that this is not on the proposed roadmap, but would remain under review in the event that this becomes useful in future. **FR** stated a desire to see the OBIE take responsibility for ensuring that there is a review in September 2020 to see if some of the questions can be answered. **RW** agreed, requesting that Trustmark is put on a forward look agenda for the September 2020 IESG.

2.46. **RW** requested clarification on the meaning of the TPP Side Customer Protection. **AA** explained that is a voluntary initiative initially built around the Customer Guidelines for TPPs and Operational Guidelines for TPPs. **AA** stated that this is being monitored; the recommendation is to continue with this work whilst working with the ICO to see if it could become a code of conduct. **IG** stated that this question is not meant to be answered in this session, but the OBIE team is trying to ensure their recommendation with regards to the TPP Side Customer Protection is not to effect any change to version 1 in the roadmap. **AA** confirmed that there will be no change required to the original recommendation.

2.47. **AA** moved on to authentication, stating that the first is 90 day re-authentication which had been discussed earlier in the meeting as part of agenda item 2.a. For clarity, **AA** reminded IESG members that the implementation, including any contractual arrangements with TPPs, is optional. **AA** went on to explain that the second big area around authentication is the root cause analysis of consent success. **AA** explained that much feedback stated that the first step is for OBIE to ascertain the facts and to ensure that the causes are determined. **AA** stated that the other point to note (especially by the ASPSP community) is whether the need for alternative authentication modes is necessary. **AA** added that some of the responses reflect the debates have been on-going since RTS was published – is redirection good enough, is there a requirement for an alternative authentication method? **AA** reminded IESG of a decision made at IESG over a year ago to focus on doing re-direction well. **AA** went on to state that with regards to the recommendation that OBIE evaluates alternative methods of authentication, the OBIE will be recommending clarity that no conclusions are being jumped into, however, the evaluation will look at the causes of consent success failure, including whether other authentication techniques might be a solution to the problems that are identified. **AA** added that one question is whether there should be a differentiation between AIS and PIS, noting that more time might be required to look at PIS, maybe different timings and both separated. **AA** was keen to hear thoughts on this.

2.48. **FR** agreed with **AA**, adding that one of the frustrations of the programme is that two different products are being bunched together. **FR** suggested a separation with considering both in isolation. **FR** stated that the functionality around PIS is not working and being investigated. On that basis, **FR** thought that something that looks at PIS holistically would be helpful, including a steer from the regulators on the value of PIS. With regards to the concept of root cause analysis, **RR** suggested that tackling the simple principles first would be best – understanding what causes TPP polling leading to failed API calls should be tackled first before moving on to alternative authentication methods.

2.49. In terms of splitting out AIS and PIS, **CM** stated that PIS cannot be evaluated properly due to low volumes of payments and PISPs have been vocal about the fact that they cannot enter the market with re-direct only; therefore, whether it is within the CMA Order or PSD2, this is a separate topic as there are a number of use cases that do not work with re-direct only. **TS** stated that the barrier for decoupled cards was raised at European level – it is mostly impossible to use re-direct, finding an alternative or complementary way of authentication is important. **AA** stated that there have been a number of different views to consider in terms of how to take this forward – is there a gap around root cause analysis - after which the way forward would be decided.

2.50. **RW** asked whether this sits within the Order, and if it does not fit in the Order, should it be in the roadmap. **AA** stated that his assumption is that PIS is in the Order and ensuring that PIS work effectively is part of the Order. **RW** stated that if PIS is not in the order, how can the Roadmap be justified or explained to the CMA and the wider community? **IG** stated that he is confident that PIS is covered in the order, the steer given to **AA** is that the Trustee's view is that effective PIS and reverse payments are covered in the order. **IG** added that the suggestion to the team was not to try and solve for that in the consultation, but to work on the assumption that everything that was in version 1 of the revised Roadmap was in the Order. **IG** added that PIS is not a new topic, and if individual banks feel that something is not in the Order and that there is a case to be made for that, then this should be brought to the Trustee directly.

2.51.   **BR** added by supporting **IG**'s comments – the Order was drafted quite broadly in certain cases and this was done deliberately as not everything could be determined. **BR** added that the Order was drafted with power given to the trustee, if anyone thinks anything is deemed as not within the power of the Trustee, this should be raised. **RR** agreed to disagree. **IG** agreed to disagree; however, on the basis of what the responsibilities of the Trustee are under the Order, those are articulated crisply. **IG** added that when the standards are written on PIS and what is required, then the working assumption has to be that they are determined to be mandatory and if this is challenged, then it has to go through a process. **IG** stated that the assumption the team made particularly in terms of the Trustee's determination of actions that have been mandated is *'what is the best way to take these items into considerations in terms of scope and timings'* and not a determination of whether these are in or out. The decision has already been made that they are within scope.

2.52.   **PM** stated that there should be a proper impact assessment of the options and recommendations. **AA** agreed that this is reasonable, adding that when the revised recommended roadmap is published, follow-up evaluations will have to look into proportionality, reasonableness of any decisions made, cost, etc. **PM** asked if this impact assessment could include impact on non CMA9 ASPSP. **AA** stated that these are good points which will be dealt with in the terms of reference for any evaluation.

2.53.   **AA** introduced the final aspect of contention - the benchmarks question, adding that this got a lot of feedback from TPPs who are concerned with some of the performance and availability levels being received and are asking for OBIE and the regulators to take more action to enable an improvement. **AA** stated that there has been a reminder of the CMA requirement in the Order for continuous availability. **AA** stated that from an ASPSP point of view, there were comments around parity and compatibility with PSD, **AA** added that the benchmark in PSD2 is to be the best performing interface and therefore the equivalent with the API channel is the best performing interface in the direct channels. **AA** stated that the other difficulty was defining parity as the type of propositions being created by TPPs are not directly comparable with a payment being made in an online banking space. In terms of looking at recommendations and clarity, **AA** stated that the question is what under the CMA Order constitutes continuous availability and what is parity given the difference in the way that a payment is made under a PISP vs. a direct channel. **AA** stated that the recommendation is a change in the roadmap to reflect that feedback, rather than setting benchmarks over and above what is required by PSD2.

2.54.   Referring to section 4.2.3 (A5 – performance, including benchmarks), **MCH** stated that some of the feedback made by the consumer representatives has not been recorded, **MCH** asked for a higher level of care to be taken before it goes out to a wider audience than IESG. In terms of the reference to the operational Guidelines, **MCH** explained that the benchmark is included (currently 99.5% for availability) and there are subtle but noticeable adjustments that reference benchmarks will be removed. **MCH** explained that there have been lengthy conversations about the importance of parity working better, therefore, it will be retrograde to remove references to benchmarks whatever their technical standing. **FR** agreed with **MCH**, stating that PIS is important, but in focusing on that, some of the AIS aspect might be missed out. **FR** stated that there are consumers who would like to rely on consumer information but cannot because it is out of date and they have to go back to the banks to get that real time information. **FR** stated that where customers want to see their information and go into their app, their information should be immediately refreshed. **FR** concluded by stating that it would be shame to miss out on AIS in focussing on PIS.

2.55.   **RR** thought that there are a number of different situations where this would arise, one of which is where the TPP is not making enough number of up-to-date calls, or the bank is failing to refer to those calls, in which case there are some performance availability issues. **RR** added that the challenge would be benchmarks on continuous availability; 100% up-time this will never happen for unfortunate and unforeseeable reasons.

2.56.   **BR** stated that the Order does say *'continuous'* and this is interpreted as being consistent with PSD2; nothing in the Order should go beyond the scope of PSD2. **BR** explained that parity, therefore, is the best performance level of performance that the bank has, it would not go beyond that.

2.57.   **AA** stated that all the issues on his list have been discussed and opened the floor to anything that has been discussed.

2.58.   **MCH** asked what happens to items that are in the previous roadmaps like P9 (which was in the previous roadmap but not in the proposal here) and P14 (which was in the first proposal but has been taken out). **MCH** was worried about the two alternative statuses - OBIE BAU and Office of the Trustee. **MCH** clarified the question – what happens to roadmap items which have the force of the Order but are not there. **MCH** stated that P14 has something around price comparison, what is the safety net for things that are within the Order. **AA** stated that these are good questions, but different in response. In terms of P14, **AA** explained that the recommendation is another look at this at some point in the future by the OBIE monitoring function. On P9 status, **AA** stated that this is one of the things that if not in this proposed roadmap, then it will not be on the roadmap that gets published by the CMA; the overarching point is that the Customer Evaluation Framework is something that will be looked at by the monitoring function and recommendations might be made by them.

2.59.   **GL** wanted to urgently address two things in the roadmap:
2.59.1. To deliver a method of Customer redress (DMS is a small requirement of this). The customers' needs are not adequately addressed.
2.59.2. The requirement for a data sandbox in the Open Up 2020 evaluation led by OBIE which was the single largest thing the TPPs responded to.

2.60.   **FR** stated that redress within DMS is still confusing; her understanding is that within PSD2, there is a redress mechanism for failed payments. **FR** explained that the issue that needs to be bottomed out is what happens downstream in terms of data breaches that may not be covered by FOS, adding that there is no clarity on how customers get redress in these instances. **FR** also stated that that it would be helpful if the FCA or ICO could be engaged so that clarity can be brought to this.

2.61.   **IG** stated that this cannot be solved now. **IG** encouraged **AA** to give everyone as much time as possible to bottom out the actual tracked changes on the scope as soon as possible. **IG** added that he then becomes the addressee in terms of stakeholder representations which could start now or upon publication of **AA**'s final output - version 2. **IG** thought it was important that IESG got the chance to talk about the recommendation that was received from 60 + participants in the ecosystem. **IG** thanked all for doing what was required to get the proposed roadmap to this phase.

2.62.   **FR** stated that there are nine organisations that have fed into this response and consumer representations have joined teleconferences, looked at responses, etc. and responded themselves and wanted to make it clear that a lot of consumer organisations are increasingly well informed and interested.

2.63.   **IG** stated that there was consistency to push back on timings which was taken on board. In order to focus on performance, **IG** stated that if space is created in the roadmap and it does not improve, then it creates a really challenging situation. **IG** stated that there is a lot of rationalisation in what is being recommended and very little is new.

2.64.   **IG** mentioned that thing like Trustmark and DMS may be reconsidered. **IG** mentioned authentication – implementation not being a foregone conclusion, taking into consideration the difference between PIS and AIS and impact assessments / evaluations. On benchmarks, **IG** mentioned the requirement to create a definition around this.

2.65.   In terms of stakeholder representations, **IG** stated that his strong preference is that IESG members should keep responses succinct. As much as possible, **IG** advised IESG members to reflect on the changes to version 1 as initial responses are on record, the idea being to avoid a re-articulation unless needed.

2.66.   **IG** asked for a focus on the tracked changes and the delta. **IG** stressed that this is not an exercise to determine the future of OBIE or Open Finance, but it is narrowly constrained to a request to reiterate what is in the CMA Order.

2.67. **IG** wished everyone a good festive period and closed the meeting.

3.a   AOB – IMPACT OF SCA ON CONSUMERS

3.1.   This was not discussed *(carry over to IESG meeting scheduled for 16 January 2020).*