

# Meeting Minutes

## OPEN BANKING

### Meeting details

Meeting date: 24 March 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	<b>AA</b>	OBIE – Head of Policy	Yes
Bill Roberts	<b>BR</b>	Competition and Markets Authority (CMA)	Yes
Candy Ma	<b>CMA</b>	OBIE – Office of Trustee	Yes
Carly Nimmo	<b>CN</b>	HMT	Yes
Caroline Ambrose	<b>CA</b>	Barclays Bank	Yes
Chris Michael	<b>CM</b>	OBIE – Head of Technology	Yes
Daniel Ehreich	<b>DE</b>	Bank of Ireland	Yes
David Bailey	<b>DB</b>	Santander	Yes
David Fineberg	<b>DF</b>	OBIE – Head of Monitoring	Yes
Ed Colley	<b>EC</b>	OBIE – Programme Director	Yes
Faith Reynolds	<b>FR</b>	Independent Consumer Representative	Yes
Gavin Littlejohn	<b>GL</b>	Fintech Representative	Yes
Hetal Popat	<b>HP</b>	HSBC	Yes
Johnny Glover	<b>JG</b>	Danske Bank	Yes
Ian Major	<b>IM</b>	TPP Representative	Yes
Imran Gulamhuseinwala	<b>IG</b>	OBIE – Trustee/Chair	Yes
Mark Chidley	<b>MCH</b>	Independent SME Representative	Yes
Matt Cox	<b>MC</b>	Nationwide Bank	Yes

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Roy Hutton	<b>RH</b>	Allied Irish Bank	Yes
Sally Chiwuzie	<b>SC</b>	OBIE IESG Secretariat	Yes
Thear Sabri	<b>TS</b>	Electronic Money Association (EMA)	Yes
Vicki Hassan	<b>VH</b>	Danske Bank	Yes

### Apologies

Name	Role	Delegate
Daniel Globerson	<b>DG</b>	Royal Bank of Scotland Stephen Wright ( <b>SW</b> )
Helene Oger-Zaher	<b>HOZ</b>	Financial Conduct Authority Nicholas Chipperfield ( <b>NC</b> )
Paul Horlock	<b>PH</b>	Stakeholder Engagement, Standards and Strategy N/A
Phillip Mind	<b>PM</b>	UK Finance Austin Elwood ( <b>AE</b> )
Robert White	<b>RW</b>	Santander David Bailey ( <b>DB</b> )
Simon McDougall	<b>SMD</b>	Information Commissioners Office Jenny Vega Destello ( <b>JVD</b> )
Stephen Smith	<b>SS</b>	Lloyds Banking Group Richard Rous ( <b>RR</b> )
Gary Sheen	<b>GS</b>	Tesco Bank N/A

### 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. **IG** explained that the reason for convening in this unprecedented way is due to the ongoing Covid-19 crisis; this is the only way to ensure the meeting takes place whilst conforming to the social distancing / isolation recommendations by the government. **IG** explained that there is a dial-in available for those who prefer, and in addition, there is a side chat bar which people could use to comment, ask to speak or feedback which **SC** or himself would pick up throughout the meeting.
- 1.2. **IG** informed IESG members of an additional agenda item in the housekeeping section – agenda item 1.d - *Business Continuity Plan, a response to Covid-19*. **IG** added that this paper is a general update to IESG members on the current situation, but it was also written in response to an update request from HSBC.
- 1.3. **IG** opened the floor to AOB requests.
- 1.4. For the future of Open Banking, **MCH** stated that he would like an update from **AE** in the absence of **PM**.
- 1.5. **FR** asked to include a conversation about consumer policy items which do not sit anywhere in particular, for example, the increasing need for a common language for consumers, effectiveness of API endpoints and balance visibility.
- 1.6. With regards to the minutes, **IG** asked **SC** if there were any requests for amendments received; **SC** explained that non-contentious requests for amendments were received from **FR** and **MCH** and would be reviewed further before

incorporation. **SC** stated that she would inform **IG** if there was anything that required further analysis. On this basis, **IG** approved the minutes for the IESG meeting held on 26 February 2020.

**APPROVAL – IESG\_APR\_LOG\_065 – February IESG Minutes - IG approved the minutes from the February IESG.**

- 1.7. **IG** moved on to actions, explaining that action numbers #228 (*Programme Update – MI*) which is about improving the MI process and #330 (*P14 Evaluation of Efficacy of Account Comparison*) which is a P14 update are still dependent on the Roadmap (which has not been finalised).
- 1.8. With regards to action #442 (*Housekeeping – Actions – Hogan Lovells Report*), **IG** stated that IESG members would have received this report on 19 February 2020.
- 1.9. **IG** advised that actions #443 (*AIS Conformance for Santander to be amended to show that the bank has passed - amended*) and #444 (*MI team to amend the information reported for RBS – OBIE team verified information contained in the pack as accurate with ongoing discussions at PMG to ensure alignment*) have been dealt with and can be closed.
- 1.10. Finally, **IG** advised that action #445 (*The future of OBIE – PM and FR to engage re consumer representation at the steering groups*) can be closed as a meeting had taken place between **FR** and **PM**.

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### ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2019_301_228	17/10/2019	EC	<b>Programme Update - MI</b> - 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.	<p><b>Update 24/03</b> – This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to the April IESG.</p> <p><b>Update 26/02</b> – This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to the March IESG.</p> <p><b>Update 16/01</b> - This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to February IESG.</p> <p><b>Update 08/01</b> - Action to remain open during consultation on the roadmap. Carry over to February IESG.</p> <p><b>Update 17/12</b> – This was discussed as part of the roadmap consultation; agenda item 2.e. Action to remain open during the consultation.</p> <p><b>Update 07/11</b> - This will be incorporated as part of the revised roadmap proposal and consulted upon.</p> <p><b>Update 18/10</b> - Memo re this action was sent to IESG members via the Secretariat with responses requested by 01/11.</p>	29/04/2020	Open	
IESG_2019_301_330	17/11/2019	AA	<b>P14 Evaluation of Efficacy of Account Comparison</b> - As discussed at IESG on 17 October 2019, IESG members to provide stakeholder representations to the Trustee, copying in Alan Ainsworth by 25/10.	<p><b>Update 24/03</b> – This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to the April IESG.</p> <p><b>Update 26/02</b> – This is awaiting completion of the Roadmap consultation to proceed. Carry forward to the March IESG.</p>	29/04/2020	Open	

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				<p><b>Update 08/01</b> - Awaiting completion of roadmap consultation to proceed. Carry forward to February IESG.</p> <p><b>Update 17/12</b> - 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.</p> <p><b>Update 19/11</b> – 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, 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.</p> <p><b>Update 11/11</b> - Review of the stakeholder representations is in progress. Carry forward to the December IESG.</p>			
IESG_2020_301_442	26/02/2020	EC	<b>Housekeeping - Actions</b> – EC to check with Hogan Lovells that the report on DMS is suitable for onward sharing and then distribute to IESG members.	<p><b>Update 24/03</b> - Agreed to close.</p> <p><b>Update 19/03</b> - This was distributed to IESG on 19/03. Propose to close.</p>	24/03/2020	Closed	24/03/2020
IESG_2020_301_443	26/02/2020	EC	<b>Programme Update – OB Status Report</b> - AIS Conformance for Santander to be amended to show that the bank has passed.	<p><b>Update 24/03</b> - Agreed to close.</p> <p><b>Update 19/03</b> - Amendment reflected. Propose to close.</p>	24/03/2020	Closed	24/03/2020
IESG_2020_301_443	26/02/2020	PM/FR	<b>Future of Open Banking Steering Group</b> – PM to engage with FR offline about consumer representation on the future of Open Banking Steering Group.	<p><b>Update 24/03</b> - Agreed to close.</p> <p><b>Update 19/03</b> - UK Finance to meet with the Consumer Advisory Panel this w/c 16/03 to discuss. As the Panel agenda is full, discussion is limited, but a follow up meeting for interested members is on offer. Propose to close.</p>	24/03/2020	Closed	24/03/2020

## 1.c PROGRAMME UPDATE

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### 1.c.i OBIE STATUS REPORT

- 1.11. **IG** introduced the programme update stating that a lot of it reflects the fact that the outcome of the finalised Roadmap is pending, following which he turned to **EC** for high level updates and QA.
- 1.12. By way of general updates, **EC** informed IESG members that the v3.1.5 Standards is in progress; with regards to NESTA, there has been a lot of work dedicated to this over the last couple of weeks and further updates showing a good understanding of uptake levels and how these are viewed in the market should follow at the next IESG in April 2020. With regards to functional conformance, **EC** informed IESG members that there has been progress, and some of the CMA9 are close to completing, but with little progress since the last update in February.
- 1.13. By way of an update on Covid19, **EC** explained that several steps were taken by the entity as documented in agenda item 1.d (*Please see agenda item 1.d below for details of this discussion*).

### 1.c.ii CMA9 STATUS REPORT

- 1.14. **IG** moved on to slide 25 reminding IESG members that this is the status report as provided by the CMA9; **IG** invited **EC** to comment on this first, certainly as to whether it provides an accurate overview and is consistent with what the OBIE is noticing. **IG** added that v3.1.4 stands out as there are a few Red statuses there and asked for commentary on this.
- 1.15. **EC** explained that notwithstanding the CMA9 that are on directions, v3.1.4 sits around two points:
  - 1.15.1. While some high-level planning has been done, the Red items reflect situations where a number of the CMA9 believe that they cannot proceed into detailed plans and commitments until the roadmap is concluded.
  - 1.15.2. A number of the CMA9 are now calling out risks associated with the heightened awareness re the requirement to monitor the provision of services; this is bringing out some risks which are reflected in Red statuses.
- 1.16. With regards to the second point, **EC** explained that Santander and Cater Allen were both to implement a number of fixes ahead of final migration, but this is on hold during this heightened awareness period. **EC** added that a number of others are facing implementation issues which have been raised by their internal change and risk teams, especially in relation to payments.
- 1.17. **IG** opened the floor to comments from the CMA9; reminding IESG members that the intent is to provide an implementation status and that performance of the implemented deliverables will follow.
- 1.18. **DB** asked to provide a bit of extra cover, explaining that from a release perspective, the bank is not allowing any releases into production for the next few weeks with a focus on system stability. **DB** stated that all releases have now stopped to ensure that the bank is keeping customers and itself safe. **DB** explained that at Santander, the team is working on a T+ plan to assume some semblance of normality before carrying on with business as usual.
- 1.19. **IG** stated that this is appreciated, and of course the intent of the bilaterals is to ensure there is the opportunity to have individual conversations with each of the banks to understand the pressures they are under.
- 1.20. **GL** contributed by stating that the feedback from the TPP community is to be mindful that both banks and TPPs are trying to find a way to serve their customers and all are maintaining important and critical services. By way of an example, **GL** explained that accounting platforms servicing the companies in the UK are trying to ensure that the correct information which enables companies to make decisions remains available. **GL** stated that some of the migrations are not going smoothly and the adjustment period has failed to leverage tensions because many of the ASPSPs and some of the CMA9 were not prepared for it. In responding to the point made by Santander, **GL** pointed out that every organisation is focussing on this but TPPs are struggling to provide their services because of outstanding technical customer experience issues which still need to be focussed on.

- 1.21. **GL** also mentioned that it would be helpful to get feedback on whether the conformance testing discussed at last steering stopped or whether ASPSPs are working on this as it does not appear to have materially improved since the last IESG on 26 February 2020. **IG** suggested that **GL**'s point could be picked up during the migration discussion, informing IESG members that **EC** will be presenting a report on Screen Scaping Migration as part of agenda item 2.a. **IG** added also that in terms of conformance, some things will be discussed as part of agenda item 2.b - Performance Improvement Plan which will be presented by **DF**.
- 1.22. **EC** stated that the actual running of the conformance is being continued by many of the CMA9, however, where fixes are required, there will be pressure on the CMA9 to apply these fixes because of the heightened awareness point. **EC** added that this is being picked up in bilateral conversations.
- 1.23. **IG** appreciated **GL**'s points stating that there are almost two million real customers using Open Banking important services and as an ecosystem, there is a responsibility to cater for their interests. **IG** stated that there are two steps:
  - 1.23.1. Step 1 is to ensure that the shortfall on conformance is understood:
  - 1.23.2. Step 2 is addressing these shortfalls.**IG** explained that during the PIP conversations, it will become apparent that this is an OBIE point of focus because they will also cover security and conformance which should give the TPPs some comfort; these will be addressed as proportionately as possible in light of present circumstances.
- 1.24. **IG** reiterated an important point from the last IESG on 26 February 2020 - whilst the Roadmap is instrumental in helping ASPSPs to determine what will be required under the Order for new items, items that were pre-approved for the Roadmap consultation and went through appropriate governance at IESG are mandatory. **IG** added that regardless of whether these banks are individual or aggregate level, whilst these items can be discussed in terms of timing, P7 (refunds) is a mandatory item and there is no indication that this will cease to be mandatory; those banks who determine that they do not wish to implement it would be doing so at risk.

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

- 1.25. **IG** turned attention to the performance metrics stating that the trend times are improving. In terms of availability, **IG** added that it looks like it is levelling out although there isn't a huge amount of data to draw that distinction as these are February numbers, therefore, there is no impact of COVID19 on the numbers. **EC** added that the number of successful API calls continue to grow during February 2020 notwithstanding that it was a short month and relative growth is steady. **EC** added that in terms of predictions, it is slightly shorter, and this is associated with **GL**'s comment earlier around the screen scraping migration being not fully completed as it should have done in February.
- 1.26. In terms of the tickets, **EC** stated that there is still a fairly significant number outstanding and looking at slide 48 which covers the aged tickets, there are just over 170 at the start of March, 60 of which predate 01 December 2019. **EC** added that the concern is that a number of tickets have been problems for TPPs and while some are not high priority, a number of these are high tickets for bringing TPP propositions. Therefore, notwithstanding the points made earlier on heightened awareness and applying fixes, **EC** stated that it is important to resolve as many tickets as possible.
- 1.27. In terms of growth in the ecosystem, **EC** referred IESG members to the TPP funnel stating that it continues to grow, non CMA9 ASPSPs are increasing, though a plateau has been registered.
- 1.28. From a website and social media point of view, **EC** informed IESG members that there has been a big uptake over the course of February.
- 1.29. **IG** asked if there is any impact of Covid-19 on this month's KPIs, appreciating that there is no March 2020 information from the CMA9 as this is not due until 10 business days into April 2020, but there is an up and running real time monitoring of endpoints via Yapily. **EC** explained that although a number of the CMA9 have had

availability issues and need to maintain vigilance on response times. **EC** added that the performance improvements have been sustainable (especially in the overnight windows when non attended refreshes are active), they are beginning to ensure the viability of the propositions as TPP growth occurs. **EC** concluded that there has been no noted impact of Covid-19 on availability and stability of the banks and the ability to apply fixes will be under pressure, however, in terms of monitoring, there is nothing unusual showing up. **IG** thanked the banks for the effort.

- 1.30. **IG** turned IESG members' attention to slide 44 on authentication efficacy, asking if the numbers are comfortable, considering polling is affecting a number across the board. **IG** expressed excitement at seeing that for some of the banks, the authentication efficacies are trending higher, adding that Nationwide and RBS look particularly good. The effect of polling aside, **EC** stated that there has been a general improvement across the piece. **EC** added that some has been because of the implementation and general stability of ApptoApp and others to do with technical fixes that have been applied. **EC** stated that the abandonment problems are more likely to do with polling than material and systemic problems. **GL** asked if this covers authentication when the customer is re-authenticating or just at initial onboarding. **EC** stated that it is both, adding that at bilaterals, he has asked for data that separates initial authentication from re-authentication, but now, the data on this slide covers both. **GL** stated that he can provide some information on what the TPPs are saying, adding that he had an unfortunate call with one of the reasonably well scaled TPPs where the CEO was talking about returning 90 shareholders as he could not see a way to sustain the business due to the re-authentication issue. **GL** explained that their rates of success were typically 40 – 50% success in getting customers to re-authenticate, with 30% of customers successfully re-authenticating between 90 – 180 days, followed by a further discussion with the CEO about customers who had tried to re-authenticate but could not get through the journey and this was accounting for another 20%. **GL** stated that the combination of customer not being able to re-authenticate on time to be able to maintain a continuous service and the issues around re-authenticating due to customer journey and technological issues was causing a lot of stress and **GL** suggested an offline conversation with **EC** around this adding that this information could do with a second page showing one for the initial onboarding which is a different picture from if they are failing to authenticate. **EC** explained that the data from TPPs as opposed to banks will give a clearer picture on that. **EC** added that there is clearly a difference between a consumer wanting to go through a re-authentication journey and the successful re-authentication journey when they do, both sides of which must be looked at. **GL** stated that 20% of customers trying to re-authenticate were failing, though more granularity is required, it seemed like technology user experience. **GL** added that other gaps include customers who failed to re-authenticate in time to ensure a service without gaps – a 3<sup>rd</sup> of the customer base did not remember to re-authenticate despite the prompts being worked on by all TPPs.
- 1.31. **TS** wondered if it would be an idea to have someone whose job it is to ensure authentication is successful. **TS** stated that it would be good to understand why there is 100% success in some cases and 90% in others; it would be helpful if an individual could resolve these issues by running a detailed analysis about it and reporting back to IESG. **IG** stated that the legislation insists on a 90-day re-authentication and this is the framework being worked under and within the framework, there is an obligation to ensure that re-authentication is as seamless and convenient as possible for consumers and small businesses. **IG** explained that the issue was identified in the status report to the CMA, recommending that a work programme is put together for this. **IG** explained that of course, some of the figures are muddy because of polling and for other figures, there are other drivers as to why the authentication efficacy is not as high as it should be. **IG** explained that this is the intent of the Roadmap item called '*RCA – Root Cause Analysis*'; the intention is to put a team against this on a granular level to get to bottom of this and followed by a better position to act.
- 1.32. **TS** added that the findings from this could be a powerful message to send to regulators - UK and/or European. **IG** stated that the intent is to get to the bottom of it in an open minded, yet rigorous way, result of which would be interesting reading for all parties.
- 1.33. **FR** asked if there would be qualitative work about consumers and why they do not re-authenticate. **IG** expressed an open mindedness, stating that if the RCA leads the team to believe that these are there are technical reasons then that could be the focus; the intent is not to pre-judge. **IG** thought it would be important to consider the different use cases and propositions.



- 1.34. **FR** stated that it might be useful to ensure that both sides – technology and the consumer side are investigated. **FR** stated that it might be the customer deciding they do not want to continue with the re-authentication, for example. **IG** reiterated that the intent is to make this comprehensive, stating that it will be an existing workstream on the approved revised Roadmap.
- 1.35. **FR** asked for a narrative on the PSU adoption on slide 43, asking if this is in line with what is expected as it looks low. **IG** explained that the plan was to come back to IESG with a better view of PSUs after the migration period as these numbers do not tell a full story; they are February 2020 numbers as opposed to March 2020. **IG** added that the scale is correct, and it shows how many more AIS users there are than PIS users.
- 1.36. In terms of numbers, **FR** thought it would be helpful to see a trend of improvement and a total number at the end.
- 1.37. **GL** stated that the graph is too complicated, adding that two separate graphs showing PIS and a second showing a comparable bar chart for PIS would be more intelligible. **IG** agreed that it is time for a refresh on the entire KPI section and this would be further discussed during the conversations on Performance Improvement Plans.
- 1.38. **IG** asked to get some commentary from **EC** on the screen scraping migration (*Please see agenda item 2.a*).

## 1.d OPEN BANKING AND CRITICAL SUPPLIERS BCP STATUS FOR COVID-19

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- 1.39. **EC** advised IESG members that the entity responded Covid-19 even before the latest measures were announced by the government. As far as a business continuity plan is concerned, **EC** explained that work from home exercises have been successfully used and had been regularly exercised by personnel and the entity did not struggle with the concept. This was invoked across the entity from 17 March 2020, and apart from the fact that there is no face to face meetings, it has remained business as usual with regards to the entity's activities. **EC** stated further that the Standards and Testing Working Groups as well as collaborations with other Open Banking groups have been run online successfully.
- 1.40. In terms of suppliers, **EC** added also that there is no interruption to service, and it has been business as usual from both OBIE / Supplier point of view. **EC** explained that the working from home across the entity / ecosystem is expected to carry on indefinitely.
- 1.41. **IG** invited **HP** to comment. **HP** expressed support for this initiative, explaining that HSBC is operating a similar model and with regards to collaborations with Open Banking, online meetings have worked so far.
- 1.42. **EC** added that there is an SME forum scheduled for end of March 2020, but likely to go into April 2020 as the right technical support for that is being thought through to ensure that the event is as effective as possible; **EC** reckoned it would accommodate circa forty attendees and that this meeting is a good test for it.
- 1.43. **IG** explained that the OBIE has been using Microsoft Teams internally and that this has been successful; this IESG meeting is a test for how it works externally.

## 2.a IESG SCREEN SCRAPING MIGRATION AND EIDAS IMPLEMENTATION

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- 2.1. **IG** introduced this discussion on slide 56 of the pack stating that there are two sections to it - screen scraping migration and the eIDAS implementation.
- 2.2. **EC** stated that the key note is that a significant number of the TPPs that needed to migrate have started and a number of them have now completed those activities – 3 across the CMA9, 5 TPPs (with LBG and NWD), 4 (With HSBC and RBS), 3 (with Barclays and Santander).

- 2.3. While there are some technical issues, **EC** stated that these are not specifically to do with in scope CMA Order products, a lot of the migration issues have to do with the end consumers / the users – PSUs adopting the consent model. **EC** added that although the TPPs have started the migration with customers, the engagement of the consumers is a much slower progress and relates to when they interact with the products. Going back to **GLs** comment on small businesses and the accounting packages, **EC** stated that there has been progress, but overall, up to the point where this report was put together, there are still a few outstanding. **EC** added that some of these have more to do with the time of the month when small business owners interact with their accounting products than whether they are ready and enabled to switch off screen scraping and move on to APIs. **EC's** expectation is that during the month, this will pick up and should show full completion of the migration in April 2020.
- 2.4. In terms of eIDAS progress, **EC** commented on the significant progress of the TPPs that are live to market and have eIDAS certificates. **EC** stated that as of this morning (24 March 2020), there were only two TPPs left to upload their eIDAS certificates – one has applied and the other is yet to. In terms of the trend charts, **EC** explained that OBIE engagement with the ecosystem to ensure the eIDAS certificates were uploaded and visible to prove the identity of the TPPs has helped tremendously as there has been recorded growth in the last 6 – 8 weeks. In terms of those that are not live to market, those that are TPPs still prototyping and beta testing within the production environment, **EC** explained that the 86 represent those that have got eIDAS while the 52 are not yet ready to upload software statements to connect to the CMA9 until they have their eIDAS certificates, therefore from a regulatory point of view, this is not a great concern. **EC** reiterated the trend chart shows significant impact of the interactions between the OBIE and the TPP community in picking up eIDAS certificates and reducing those who do not have them.
- 2.5. **IG** thanked **EC** for the overview, stating that that it seems OBIE played a valuable role in trying to assist with the migration. **IG** stated that his understanding is that this exercise is complete, and therefore no longer required any more in the pack. **EC** stated that while eIDAS is almost complete, it is worth keeping a watching brief over the next month, however, on screen scraping, **EC** stated that more work will be done with the TPPs on staying engaged in the process to ensure CMA9 and other ASPSPs go through to completion. As the merits of the interactions have been evidenced, **EC** stated that it is owed to the ecosystem to ensure that the activity is driven home.
- 2.6. **MCH** referred to his past conversations with regards to attrition whereby small businesses find themselves losing out on the cloud accounting services. **MCH** asked to see a piece of work done to try and get some handle on attrition, as there is enough going on without the prospect of losing critical business at the same time.
- 2.7. **GL** stated that it is a critical time for businesses who have been well resourced and technically able and are not companies that are new to engineering connections with banks and the adjustment period was set up to enable TPPs to move their customers across to the API. **GL** added that it was assumed that the technology delivery was complete by the FCA in making that adjustment of the ASPSPs; however in the left hand column of the TPP comments, most of the issues that have been faced have been technology related and many of the TPPs reported had chosen to stop migrating because of moving customers to a poor experience of accountancy package than they were getting from their screen scraping model pending certain ASPSPs (CMA9 and non CMA9) making those fixes. **GL** explained that the TPP community is a little frustrated that the supervision of ASPSPs has not led to better clarity from the FCA about delays to SCA being applied whilst these fixes were put in place.
- 2.8. In the community that **MCH** represents, **GL** stated that there is a legal obligation for record keeping and sometimes the account owner is not the same as the person who does the bookkeeping and quite often there is a gap in getting through the authentication. On many of the consumer propositions like money management and budgeting apps, **MCH** explained that there is no requirement for the customer to keep records – it is voluntary and the challenge to reengage / reconnect has been partly due to the migration problem. **GL** stated that in terms of the feedback from the TPP community, there is still quite a lot to do.
- 2.9. **MCH** wanted IESG members to note that the Screen Scraping Migration and eIDAS Implementation paper sets out a view of the ASPSP and TPP, but for the consumers and small businesses, it is harder to readily assess the view of the end user. **MCH** stated that if it were to be documented, there would be issues not least because there is the coincidence of the extension to 14 March 2020, 31 March 2020 year ends and everything else which is out of

anybody's control. **MCH** thought, on this basis, it would ideal to see a specific page trying to identify the impact of attrition on small businesses (i.e. a loss of these services which are critical to the UK economy).

1.44. **IG** summarised the discussions thus far:

1.44.1. A suggestion that OBIE continues to support TPPs and ASPSPs on the migration (at least for another month);

1.44.2. A further update (despite being beyond the deadline) is valuable at the next IESG on 29 April 2020;

1.44.3. With regards to small businesses, reach out to SAGE, Intuit and Xero.

For the 3<sup>rd</sup> point, **IG** asked if MCH would get involved; **MCH** was happy to, adding that it would be good to reach out to representatives of these small businesses as they would anecdotally have a finger on the pulse.

**IG** stated that one of the CMA9 owns Freeagent and asked if RBS wanted to comment, **SW** asked to check and report back to IESG.

**ACTION - IESG\_2020\_301\_446 - Programme Update**

**a. OBIE to continue to support TPPs and ASPSPs on the migration (at least for another month);**

**b. A further update (despite being beyond the deadline) to be presented at the next IESG on 29 April 2020;**

**c. With regards to small businesses, reach out to SAGE, Intuit, Xero.**

**Due Date – 29 April 2020**

1.45. **IG** moved the agenda along to a discussion about Performance Improvement Plans (*please see agenda item 2.c*).

## 2.b STANDARDS V3.1.5

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2.10. **IG** introduced the Standards v3.1.5 paper for approval, stating there are 4 elements to the intended publication:

2.10.1. The API Specifications (technical standards)

2.10.2. The Customer Experience Guidelines (UX standards)

2.10.3. The Operational Guidelines

2.10.4. The MI Specification

2.11. **IG** confirmed that these approvals are updates for latest version of the specs, which have gone through good governance, unanimously approved at TDA and undisputed.

2.12. **GL** asked if the TPP representatives were at TDA. **CM** confirmed that three representatives were present, **GL** stated that he was happy to approve on that basis.

2.13. **IG** asked if there are any objections.

2.14. **CA** asked for clarity on v3.1.5 spec, stating that account holder name has been added to this piece and wanted to know if this is conditional, optional or mandatory.

2.15. **CM** explained that the elements like data objects or data fields in the API's are generally conditional. **IG** additionally added that depending on the individual firm, it is not mandated on a blanket basis, but specific firms will need to appraise it. **CM** confirmed this, adding that even within firms, it might be mandatory for some products and others not. **IG** concluded that it is not mandated on a blanket basis, but specific firms will need to appraise it to decide if it is mandatory or not. **CA** found this helpful.

2.16. **IG** approved the first paper – API specifications.

**APPROVAL - IESG\_APR\_LOG\_068 - API Specifications**

**The updated Read/Write API Specifications have been based on remediation of known issues in v3.1.4 and TDA decisions listed below:**

**- TDA Decision 214 - Changes to the transactions AIS endpoint to address mutability of booked transactions (change request OBSD-13322 raised by Santander).**

- **TDA Decision 216** - ASPSPs to return account holder's name in payments API responses (this change is driven by EBA Q&A response).
- **TDA Decision 217** - The population of Booking Date/Time for credit card transaction (No technical change, however, guidance has been added for ASPSPs to provide an expected booking date for Credit Card Transactions).
- **TDA Decision 219** - Provision for returning beneficiaries other than trusted beneficiaries (change request OBSD-13846 raised by RBS).
- **TDA Decision 220** - HSBC request to increase the size of transactions/transactionReference field.

- 2.17. **IG** moved on to discuss the Customer Experience Guidelines (UX standards), stating that this is an update making it more readable, it has gone through consultation and most of this was with the consumer groups; updates of which have been reflected. **IG** added that his understanding is that the input has been reflected and that it contains nothing contentious and hence he is minded approving. **CM** explained that there was a very long feedback window and only minimal amount of feedback outside of consumer groups. **CM** added that the team worked closely with the consumer groups to implement the changes and none of the changes put any requirements on ASPSPs and for TPPs, there are further non-binding guidelines in the Customer Experience Guidelines. **CM** stated that there are some visual enhancements to make the wireframes easier to read and more consistent; **CM** reiterated that nothing in this paper is contentious.
- 2.18. **IG** asked if there were any objections.
- 2.19. **GL** stated that although these are not binding on TPPs, they are useful and high-quality outputs and the team needs to work harder on communicating the benefits to TPPs. **GL** offered his assistance to make this happen.
- 2.20. **IG** appreciated this, explaining that there had been no push backs from TPPs as it means they have less work to do in interpreting guidelines and regulations, adding that this needs to be amplified to a broader base of TPPs as opposed to the usual suspects.
- 2.21. **IG** approved the paper – Customer Experience Guidelines.

### **APPROVAL - IESG\_APR\_LOG\_069 - Customer Experience Guidelines**

*The guidelines have been updated to include enhancements and changes from v3.1.4 as listed below:*

- **Updated PIS wireframes** (where account selection happens at the ASPSP) to illustrate HCC policy statements requirements for ASPSPs. We note that these requirements came into force 18 December 2019, and consequently, we expect that ASPSPs would already have met their requirements in this regard, so we do not anticipate any implementation activity on this basis. The objective of this update is intended for illustrative purposes only.
- **Further guidance for ASPSPs and TPPs around displaying TPP and Agent names during the provision of open banking services** to reflect this knowledge base article (<https://openbankinguk.github.io/knowledge-base-pub/standards/general/company-name.html>).
- **Visual enhancements to all user journeys and wireframes**, which in themselves do not introduce any changes to meaning or requirements for either ASPSPs or TPPs.
- **Further detail on the “Set Up” and “Consent” stages of the customer journey to enable guidance on clearer explanation of the value exchange between consumer and TPP.** This content was previously approved at IESG on 17 October 2019.
- **Minor reported errata.**

- 2.22. **IG** moved on to The Operational Guidelines stating that **CM** has looked more carefully at the EBA guidelines to ensure the Operational Guidelines reflects that, this has been to consultation and there is nothing contentious.
- 2.23. **CM** explained that this covers voluntary Operational Guidelines for TPPs and the paper summarises what that is all about. **CM** stated that **GL**'s comments around CEG is important here and this is useful to people based on feedback received, however, there is a 'what do we do next?' question on how to work closely with the TPP community and

**GL**'s offer for FDATA and consumer representatives to help would be useful here as there is a need to get more buy-in into getting people to start adopting it.

- 2.24. **GL** commented that these guidelines have been developed in collaboration with industry and have been provided to the FCA and HMT as proposals of what future regulations should look like and if they are requirements, people would pay more attention to them. **GL** thought that regulators should use this as a starting point for what should come next.
- 2.25. **FR** was supportive, asking how this could be set on a trajectory so that it can be used to create a code. **FR** stated that now it looks like an information pack and there is a distinct difference in tone if this is looked at as a code that the ICO could consider. **FR** suggested that there is a need for a working group to determine if everything required has been considered.
- 2.26. **IG** explained that there is no comprehensive answer and it is something that needs to be picked up with some of the other regulators as it is not within the mandate of what is being developed here.
- 2.27. **FR** asked if this is outside of scope, how it will be developed on the Roadmap.
- 2.28. **IG** stated that being outside of scope refers to the fact that there is no regulatory or enforcement access that the OBIE has on TPPs.
- 2.29. **IG** took comments thus far as endorsement of what has been worked on so far despite questions on enforceability.
- 2.30. **IG** approved the paper – Operational Guidelines.

### ***APPROVAL - IESG\_APR\_LOG\_070 - Operational Guidelines***

***The Guidelines have been updated to include the following changes:***

- ***Inclusion of voluntary Operational Guidelines for TPPs covering Change Management, Data Ethics, Data Privacy, Contract & Supplier Management and Business Continuity and Disaster Recovery.***
- ***Inclusion of new EBA Guidelines regarding KPIs for availability and performance that an ASPSP should have in place for each their dedicated interface(s), including a revised reporting template.***

- 2.31. With regards to the MI Reporting Specifications, **IG** wanted to ensure that as a lot of work has been done in consultation with the CMA9, where there are there specific issues for banks (such as the example given by **RR** earlier), that these can be dealt with separately instead of getting them confused with the overarching standards.
- 2.32. **CM** stated that there are several key things to note in this paper:
  - 2.32.1.1. Firstly, **CM** stated that this is to bring this in line with the Operational Guidelines and the templates that are aligned with the EBA guidelines for the KPIs for reporting.
  - 2.32.1.2. The second is that this encapsulates the MI for 3.1.4. as at the time of publishing that, MI reporting specifications were not reported because the EBA specifications were being considered and a repetition was being avoided. **CM** stated that this rolls up some of the additional functionality in 3.1.4 around 90-day re-authorisation
  - 2.32.1.3. The third element is some of the PSU adoption and consent metrics which were change requests back in October 2019 that went through PMG and supported in principle by all the CMA9. **CM** mentioned that there is an industry point around separating these out from the implementation of it. **CM** did not think that any of the content is contentious as it is based on things that has been agreed or aligns to the Operational Guidelines.
- 2.33. **IG** opened the floor to questions or comments and there were none.
- 2.34. **IG** concluded stating that he wanted to be clear that the specification is right, stating that the process has been robust and where there are specific issues for individual banks (perhaps to do with timing), these would be dealt with on an individually on a bilateral basis.
- 2.35. On the strength of the standards itself, **IG** was happy to approve the MI paper.

## **APPROVAL - IESG\_APR\_LOG\_071 - MI Reporting Specifications**

**Based on v3.1.5 of the API Specifications & Operational Guidelines, OBIE has updated the MI specification to incorporate the following changes:**

- **Inclusion of new EBA Guidelines regarding KPIs for availability and performance that an ASPSP should have in place for each their dedicated interface(s).**
- **Inclusion of metrics for v3.1.4 functionality, specifically Refunds and 90 Days Re-auth.**
- **Additional PSU Adoption and Consent Metrics as defined in change request OBSD-11553 (<https://openbanking.atlassian.net/jira/servicedesk/projects/OBSD/queues/issue/OBSD-11553>).**
- **Errata from Jira tickets and other internal/external reviews (Details are listed in section 8.1.2, MI Requirements v3.1.5).**
- **Inclusion of validation conditions to ensure accuracy of data.**

## **2.c PERFORMANCE IMPROVEMENT PLANS (PIP)**

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- 2.36. **IG** introduced the paper for discussion stating that PIP is part of the proposed Roadmap, which is yet to be approved, however, upon approval, **IG** wanted to ensure that this item is ready. **IG** explained that the idea is to address performance and conformance; the drivers for this include:
- 2.36.1. TPP and end user frustrations stemming from lack of performance;
  - 2.36.2. The regulatory elements – adherence to standards; and
  - 2.36.3. From a CMA9 point of view, poor performance leads to open JIRA tickets which many would like to remove as there are costs associated with these.
- IG** also thought it was important to note that there is no requirement in the PIP process for any additional API MI, but there is a requirement for the proxy data to enable all stakeholders to be comfortable that the principles of parity and PSD2 are being met. In terms of timing, **IG** stated that this is complicated, not just because of Covid-19, but also the intent was to have PIP plans by the end of March, and nobody believes this to be feasible. **IG** informed IESG members that in the document put together by **DF**, it does not transpire that there will be any PIP plans until the end of August 2020. Additionally, **IG** stated that other things can be done like challenging the data which should give TPPs comfort that activity is ongoing in this area, plus comfort to the banks that there is space and time to address some of these issues before any type of enforcement would happen under the official PIP plans. **IG** commented on this being a complicated balance that is trying to be struck and asked for stakeholders to be empathetic to the trade-offs required.
- 2.37. With highlights given, **IG** invited **DF** to talk through some of the phases in which these activities could roll out.
- 2.38. In drawing out highlights of the phases included in this paper, **DF** made references to two items in particular:
- 2.38.1. An intention to have a transparent and time conscious process. Proxy data is being sought to assess parity with own channels - data on personal and business account API performance. The key is to provide a transparent view to all, with the intention to ask for information at the end of this month to be provided from April 2020 onwards, which will be delivered in May 2020. From May 2020 onwards, the intention is to publish that data; this will be required to assess how well the CMA9 are performing against own channels, but also against the Operational Guidelines. All this information can be looked at holistically to see where there is improved performance against parity or the Operational Guidelines.
  - 2.38.2. As well as discussing the data received, the quality of JIRA tickets will also be discussed with TPPs and looking at performance related issues arising out of the TPP community. Upon there being a full quarters worth of data collected, PIPs will be requested. Help from the CMA9 would be required to build these PIPs depending on rank and assessment against own channel journeys and the Operational Guidelines.
- 2.39. In addition to the points made above, **DL** stated that further along the line, there will be a recommendation or a reassessment by the Trustee and a status report submitted to the CMA, including ongoing monitoring.
- 2.40. **IG** reiterated that this document is marked for discussion as opposed to approval and opened the floor to comments.



- 2.41. **GL** expressed support for the process but wanted to raise a query with regards to security profile conformance. **GL** stated that these have been available from the summer of 2018 and there are discussions about implementing these conformances in the future, yet this has always been a requirement. **GL** was not sure that putting them in the PIP changes anything and wanted to know why everyone is not being directed now to ensure they are compliant.
- 2.42. **IG** clarified that the PIP (which is about performance) is distinct from conformance. On conformance, the team is trying to get confirmation that both the functional and security conformance will be successfully passed as soon as possible and specifically on security, it is about FAPI conformance. **IG** explained that in the past, successful conformance passes against the OBIE profile, but now the Standards mandates conformance against FAPI.
- 2.43. If FAPI security conformance suite has been available from the summer of 2018, **GL** wanted to understand why there is no conformance.
- 2.44. **IG** explained that at the moment, there are bilateral conversations with all the CMA9 and discussions at PMG whereby the banks are all making progress to conformance to the security standards and FAPI profile. **IG** explained that this mechanism is to ensure that there is written confirmation to the Trustee on precisely when the banks will provide a successfully passed FAPI certificate for the standards. **IG** added that once this is obtained, monitoring and action can commence. **IG** acknowledged the fact that FAPI performance toolkits have been available for a while, but the Trustee has not been informed of these passes.
- 2.45. **EC** made a couple of points:
  - 2.45.1. the implementation of the FAPI profile has been mandated for some time. The OB security profile was against the final implementors draft for the FAPI profile, there was a variance when FAPI was eventually published and the FAPI tool was made available by the Open ID foundation.
  - 2.45.2. In terms of adoption of the OB security profile, there is significant comfort that the CMA9 have implemented good security implementations, however, all are also mandated to provide FAPI conformance.
- 2.46. **DF** supported **EC**'s comments, explaining that this is the reason why the PIP was worded very carefully. **DF** stated that it is expected that a number of the CMA9 will be able to demonstrate that they have this, but they need to run the tool, hence the request for confirmation that the banks have obtained this already, adding that until the tool is run, there is no clear answer but these remain ongoing extensive conversations at bilaterals and PMG. **DF** concluded by stating that there needs to be a point when this is evidenced definitively in writing to the Trustee on this topic.
- 2.47. **FR** wanted to clarify that this is an administration issue. If not, **FR** wanted to know what the key blockers are considering this has been discussed at bilaterals over months. **FR** also wanted to know if all the CMA9 have conformed to the Open Banking security profile. **EC** stated that all but one of the CMA9 have security conformance and most are up to date with regards to FAPI with a couple needing some fixes to be able to implement.
- 2.48. **GL** stated that the Open Banking conformance was meant to be in place since September 2017 and if a bank has not been conformant, the process needs to be tightened up because it seems that this is something that is drifting and being on the Performance Improvement Plan gives a new line in the sand, but really ought to have been executed a while back.
- 2.49. As one of the CMA9, **HP** asked to make a comment. From an HSBC point of view, **HP** stated that for release 3 and release 3 endpoints, FAPI conformance was achieved using OB certification. **HP** explained further that v3.1.1 has not been completed but is close. **HP** stated that each set of changes requires a recertification so if one implementation has not been done, it does not mean that that firm has not consistently achieved compliance for historic deployments and so the suggestion that not all are conformant on that basis is incorrect. Moving off conformance, **HP** stated that there is a lot of narrative on PIPs and in terms of scope and mandate, the data that is requested in the note is wider than the scope of the Order, adding that their online channels and mobile channels are much wider than the perimeters of this order, the API channel already covers more than the scope of the order.

On this basis, **HP** thought this to be a difficult discussion that deserves more thought. **HP** stated that there is reference to the Operational Guidelines, but when the metrics were published, there was no discussion around those and these were suggested as guidelines taken from other industries where potentially, best practice might be observed. **HP** added that there was never any indication that this was meant to be enforced. Finally, **HP** stated that HSBC does not have direct comparable channel metrics because their API channel is not a dedicated interface and therefore, they would not be able to meet the timescales for providing the metrics.

- 2.50. **IG** thanked **HP** for the comments, stating that the security protocol was a mandatory element under the standards and what the OBIE team is trying to do is to ensure that through a rigorous process the conformance tool is run across the current implementations so that the gaps can be obvious. **IG** stated that up until now, the discussions with the banks with them ascertaining whether they have been compliant, and this is a more granular and in-depth way of ensuring that this is the case.
- 2.51. **IG** wanted to make it clear that the document does not suggest that the benchmarks in the Operational Guidelines are legally enforceable and if that is the suggestion, it should be fixed. **IG** stated that the framework being worked under is around parity. **IG** added that the OBIE team is working to ensure that the CMA9 are comfortable that they are compliant with regards to conformance and therefore, on that basis, to explain the proxy as that is what each bank will use to measure its own parameter to ensure conformance.
- 2.52. **HP** asked if parity was ever explicitly an objective under the Order, stating that it is under PSD2 which OBIE would not be able to enforce. **IG** explained that the history of this is that the Order states that the read-write API specifications need to be continuously and readily available which gives a degree of discretion on interpretation; one school of thought meant 100% up all the time (not realistic) and another school of thought is that it needs have some realistic bench marks, yet another school of thought is the principle of alignment. **IG** stated that there needs to be some mechanism for ensuring that the read-write APIs are compliant with the Order. **IG** stated that this is borrowing from PSD2 so as not to create additional workload and conflicting regulatory requirements for the CMA9 - a helpful and proportionate approach which means the proxies need to be seen. **IG** stated that this could be turned around - *how are you ensuring that you are compliant under PSD2 for the in-scope elements of the APIs?*
- 2.53. **RR** shared LBG's approach to the proxy requirements. **RR** explained that their AISP speed of response would be compared with their direct channel and speed of response to mobile app. **RR** stated that they would propose not to go through an elaborate exercise to strip out PCA customers from those who have credit cards, mortgages, savings as it would not be a proportionate way to use time and resources. **RR** added that other banks will have their own architectures, therefore, a sensible principle-based discussion should allow those differences to be raised. **RR** wondered whether it is necessary to try to break out business current accounts from personal accounts and LBG had observed that this requirement has never been in the OBIE specifications or in the MI and therefore, LBG has not built around being able to make that break out, but have performance on BCA and PCA which seems to meet the requirements in a proportionate way.
- 2.54. **IG** referred to the 2 points made by **RR** (proxy measures and API MI). On the latter, **IG** stated that what OBIE is trying to do is gather information on what entities are doing; if this can be standardised in the most comparable way across the CMA9, then it is at its most meaningful and if doing that means that it is not proportionate because of local architecture for example, then a conversation would be required. **IG** stated that he would be happy to have this conversation with LBG on a bilateral basis. With regards to the point on the parity piece, the PIP was intentionally not written to state that standardised proxies are required across all the CMA9 and therefore there will be a consultation to determine the best proxy for the banks to use to derive this information. **IG** stated that it was taken into consideration that different banks will have different architecture, therefore, the approach is to ask the banks to explain which proxies they are using which will enable OBIE to conclude that the proxy is compliant. **IG** stated that **RR**'s description is a good basis for a conversation.
- 2.55. **GL** asked if this is not taken straight from the RTS as there is something in the PSD2 requirements that states that *if a bank is providing a direct channel and for that channel to be compliant, it has to be performing at least as well as their customer facing payment channels, both for online and app*. **IG** stated that these principles are helpful,



however, there is a need to dive into the detail – the request to the CMA9 is – *how are you interpreting that information? Please share so we can track and get ourselves comfortable with compliance.*

- 2.56. With regards to FAPI, **CM** stated that there is a joint Open ID foundation and the FAPI Working Group workshop targeting the end of April 2020. **CM** stated that this is not aimed at the CMA9 specifically but at any ASPSP and TPP. **CM** added that the core of this is to get people to understand the difference between the FAPI and the previous profile, what the tool actually does and how easy it is to use, what the certification process looks like and the changes to the FAPI profile to suit other use cases. **CM** asked IESG members to encourage the relevant people in their firms to take part.
- 2.57. **IG** opened the floor to comments, stating that otherwise feedback could be provided bilaterally.
- 2.58. **DF** stated that the letter will be coming out within the next week or two. **IG** asked for IESG members to approach **DF** if they have additional commentary or points for clarity or feedback.
- 2.59. With regards to MI, **GL** referred to the fact that **IG** had mentioned engaging a technology provider to deal with the measurement of API performance and wanted to know what part of the measurables would be in the suite of things that are self-reported and what would be measured by the measuring tool.
- 2.60. **IG** explained that broadly speaking, a third party who provides real time information on availability and response times by endpoint is being provided and the team is embedding to ensure that it is consistent with what the CMA9 are reporting. **IG** stated that as confidence improves, this will be considered in the decision making and may be considered for addition into the pack.
- 2.61. **EC** explained that the context of the tool is correct, however, upon agreement of the Roadmap, the delivery of MI from the ASPSPs (the CMA9 and others) will also consume and send back data back to the TPP community on the effectiveness and quality that they see on an ongoing and highly scalable basis across the ecosystem.
- 2.62. **GL** stated that it would be helpful to see a list of things that are being measured presented on a table with an explanation as to whether the intention of each is to self-report or form part of the technology suite so that the functional specification can be seen and where capabilities start and stop can be determined. **GL** wanted to know whether this is possible based on the procurement process.
- 2.63. **EC** stated that the point is that without seeing the full picture and doing the rest of the work that is within that MI workstream, only two thirds of the picture would be seen, however, he stated that he would be happy to comply with **GL**'s request.
- 2.64. **GL** stated that the ability of IESG members to opine on this is limited because the core measurements are not visible.
- 2.65. **FR** stated that if it would be good to have a session on MI as a refresher on how they are grouped together, how they are reported, what the output of the reporting is, where it goes, etc. **IG** stated that this can be discussed offline.

## 2.c PROPOSAL FOR CONSUMER RISK MONITORING FOR OPEN BANKING

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- 2.66. **IG** invited **AA** to say a few words about the end user risk committee.
- 2.67. **AA** explained that at the last IESG on 26 February 2020, a paper on consumer risks was presented by himself and **FR**; one of the actions was to create an end user risk committee that would agree terms of reference and an initial view for escalation to IESG. **AA** added that nominations and feedback were requested, and nothing has come through just yet. In order to move things forward more quickly, **AA**'s suggestion was to start with an IESG member or their alternate as suggested members of the committee.

- 2.68. **FR** reiterated the need to drive this forward lest it gets lost from the agenda. **FR** added that it would be good to get something in the diary as this is not onerous and could be moved forward quickly.
- 2.69. **IG** stated that this sounds like all the materials are available already and is a case of getting some commentary around it.

**ACTION - IESG\_2020\_301\_447 - Proposal for Consumer Risk Monitoring for Open Banking - Nominations to create an end user risk committee to agree terms of reference and an initial view for escalation to IESG has been requested. AA to put forward all IESG member or deputies and set up a kick-off meeting ahead of the next IESG on 29/04.**

**Due Date – 29 April 2020**

## 2.d REVISED ROADMAP – CONSULTATION UPDATE

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- 2.70. **IG** handed over to **BR** for this update.
- 2.71. **BR** stated that the end of the consultation period was 26 February 2020. **BR** explained that the CMA has been going through responses, including holding meetings to elaborate on representations made this is now close to forming a view on the test that has been applied to the Roadmap considering representations received. **BR** stated that there were representations about a few things:
- 2.71.1. Scope - whether it will be lawful within the scope of the Order to require certain things in the Roadmap.
  - 2.71.2. Proportionality - there is a well-defined process that the CMA will go through to determine proportionality which is set out in the guidelines.
  - 2.71.3. Process – the CMA has been working through every item in the Roadmap to see if they pass these tests and a decision is close.
- 2.72. **BR** stated that a lot has happened since 26 February 2020 (Covid lockdown was not predicted in representations) and UK Finance has stated that there is a need for some regulatory forbearance; therefore the CMA is now looking at the Roadmap through two lenses as stated above and to reiterate: firstly, the legal lens – the proportionality test and the process test and secondly, timing.
- 2.73. **BR** explained that it may be that all or none of the items in the proposed Roadmap pass the legal tests and a view must be taken on whether to approve and when. **BR** added that the *whether* and the *when* are being decided and a decision is imminent. Following an initial meeting with UK Finance, **BR** explained that another meeting is in contemplation.
- 2.74. In terms of the journey, **BR** stated that not all banks are at the same place which may indicate there will be conversations with the CMA9 on where they are, as opposed to a one size fits all solution.
- 2.75. **GL** tried to explain from a TPP point of view that the TPP community would be prepared to look at some balanced view that does not kick off new workstreams until a better steer on existing deliverables is more apparent.
- 2.76. **BR** asked if **GL** could put this in writing while the Roadmap consultation is still being considered. **GL** said that the TPP community will have a call and then respond in writing within 24 hours.

**ACTION – IESG\_2020\_301\_448 - GL to write to BR on proposal regarding the Roadmap.**

**Due date – 27 March 2020**

- 2.77. **IG** moved on to AOB.

## 3.a. AOB - USE OF OPEN BANKING FOR CORONA VIRUS BUSINESS INTERRUPTION LOANS (CBILs)

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- 3.1. **IG** introduced the first AOB item – The use of Open Banking on CBILs which are either issued by the British Business Bank or indirectly through the CMA9 themselves. **IG** turned to **MCH** for an update.
- 3.2. **MCH** explained that this is a loan guarantee scheme that the British Business Bank is putting in place as part of the Chancellor's support announced in the budget and one of the things that could make applications for loans simpler is information about accounts flowing through Open Banking channels. **MCH** was sure that there are members of the CMA9 who are engaged in conversations with TPPs and others in the marketplace. **MCH** asked whether principled banks are thinking of extending their loan facilities to CBILs (5 of the CMA9 provide business current accounts to 90% of the market); this is early days of this new scheme and **MCH** wanted to initiate conversations about whether the banks are considering working for CBILs.
- 3.2. **BR** was supportive of this, stating that anything Open Banking can do beyond the scheme mentioned by **MCH** would be terrific. **BR** added that if relief will be given by certain mortgage lenders to consumers, then there may be some scope for using transaction data to make peoples lives easier.
- 3.3. **IG** stated that over the course of the weekend, there have been many activities from TPP led innovators talking about how they could use Open Banking to help in the current crisis. Other than CBILs, **IG** mentioned a small group who are helping the self-employed to prove that they are furloughed workers so that they can claim for additional support. **IG** added that one of the TSPs is offering free PISP services. **IG** mentioned that additionally, the mortgage holiday piece has been raised and **GL** is looking at things like the use of transaction data to get a better sense of what the economy is doing. **IG** stated that there are many ideas brewing and it would be great if Open Banking could do whatever possible to amplify and support that.
- 3.4. **RH** stated that the details of the scheme have only just been released in the last 24 – 48 hours and there is not enough information just yet. **RH** stated that it would be nice to do something with this, but most banks are scrambling to ensure existing processes work remotely within their framework, and as the crisis wears down, most of the banks will be focussed on this, so it may not happen within the next few weeks. **IG** thought this was a realistic and pragmatic response.
- 3.5. **HP** contributed by stating that the underlying principles of the scheme are like the Enterprise Finance Guarantee and, banks are required to follow a credit underlying process, backed up by the government. **IG** stated that there is a lot more than just transaction data set available through the Open Banking API needed. **HP** stated that HSBC is looking at whether API based data can be used to augment this and the initial view from past history (EFG and Small Business Loan Guarantee Scheme) is that it is not the top thing to prioritise because majority of the applicants will be existing bank customers and therefore, HSBC will not need the transactional data from another bank when HSBC possesses it (use case as opposed to technology problems). In terms of personal lending, **HP** stated that they are AIS data from other banks to underwrite customers for mortgages, loans and credit cards for all 3 UK brands and the government help scheme is structured in such a way that customers will go to their existing customers as opposed to Open Banking, however, **HP** thought that Open Banking has been helping to make loans to customers who are otherwise credit worthy. **IG** thought this was helpful.
- 3.6. **MCH** explained that there is a likelihood that people will not see this as an opportunity for switching and would want to stick with their existing provider.
- 3.7. **GL** described the process they are working on - GOFCoE has pulled together a response to the Covid-19 outbreak to look at the provision of detailed economic information to key decision makers in government and in the Bank of England and other regulatory authorities explaining the rapidly changing processes in the economy. **GL** said this is split into two areas:
  - 3.7.1. Business; and
  - 3.7.2. ConsumerFor the business side, **GL** stated that conversations have commenced with the Cloud Accountancy Software providers to deliver insights (for example, how many days any distribution curve across a million companies it is taking to get paid by their customers and provide money to their suppliers.). On the consumer side, **GL** stated that

it is a different set of data but the same purpose – stitching together Open Banking data over a wide spectrum of TPPs who use deep categorisation to explain the changing nature of earning and explain to the government how it is distributed across household activities. **GL** added that they will also be looking at vulnerable groups, providing early insight to the government across both business and consumer on whether their interventions are having an effect and getting through to the right people.

- 3.8. **IG** stated that this is not the right place to have a broader discussion on this and was sure people will reach out if they want to understand more. **IG** stated that in thinking about Open Banking functionality, that there may be a few things that may be helpful in the current environment and the recovery stage. **IG** stated that the team is trying to pull together some of the thoughts that have been circulating in the ecosystem to ensure that they have the right people in the right room. **IG** noticed that a lot of the TPPs have been collaborative about what they are doing, which is what **GL**'s initiative is about. **IG** encouraged IESG members to send in ideas so that these can be discussed with the aim of seeing what OBIE can amplify and accelerate.

**ACTION – IESG\_2020\_301\_449 - The OBIE to aggregate innovative developments enabled by the Open Banking that can help the Covid-19 crisis and recovery phase.**

**Due date – 29 April 2020**

- 3.9. **FR** stated that it would be good to have an open session as a group to think about how to use the skills available to help people and the community. **IG** stated that the first step would be to aggregate all the information coming in so that substance can be separated from noise and then take it from there.

### **3.b. AOB - UPDATE ON UK FINANCE FUTURE PROCESS**

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- 3.10. **IG** introduced the next AOB item - Update on UK Finance future process, stating that this was requested by **MCH** for **AE** to respond to.
- 3.11. **AE** stated that this project has also been affected by Covid-19, adding that it was supposed to have been finalised by March 2020, but due to the industry ban and considerations, attention has been drawn elsewhere and finalisation might be delayed.
- 3.12. **AE** explained that the proposals are ready to take forward the valuable elements of standards and services that OBIE provided which is a key strategic enabler of the industry. In order to support this, **AE** stated that setting up an additional and separate monitoring function is the current recommendation. **AE** added that of all the participants round the table, one of the things that has stood out is that there is a real need to ensure that all the other stakeholder groups that the industry may require are represented. **AE** stated that they have been discussing how the CMA9 appropriately feeds into this, how PSD2 requirements feed into this, how Open Banking works to support Confirmation of Payee, how Premium API's and other innovations can be developed and taken forward. **AE** stated that UK Finance were under the impression that the PSD2 requirements and the Open Finance piece would become the main driving factors in how this industry and the Open Banking ecosystem develops.
- 3.13. **MCH** thanked **AE** for the update, but wanted to follow up the original AOB request, stating that all stakeholders who attended the IESG in February would be aware that **FR** had pointed out that despite significant efforts on her part, there was still a concern about consumer input and **FR** has since had engagement with UK Finance and Accenture, but the mechanism which was being proposed to use was the UK Finance primary advisory group. **MCH** wanted an update on how this engagement has been going.
- 3.14. **AE** explained that UK Finance were on the verge of giving a more formal update when Covid-19 broke out and they are busy responding to that. **AE** stated that they are aware that UK Finance need the consumer input into how this is formed but also that the industry body itself can take on customer input. **AE** was aware of the good lessons learnt that could be drawn into the new body.
- 3.15. **MCH** stated that the question is not being answered, adding that this is a conversation about a new body, the existence of which has not yet been agreed, neither has how consumers will be represented. **MCH** wanted to know

about consumer input into this entire process on the future process of OBIE, adding that **AE** seems to have confirmed that there has been no input through the advisory group.

- 3.16. **AE** explained that **PM** has been reaching out to the Consumer and Small Business Enterprise representatives and was not sure if the call had happened yet, but from his point of view, he was happy to take that forward.
- 3.17. **MCH** stated that **AE** may not have the information to hand but wanted to understand why there has been no consumer input as this was the information passed on in January and February 2020. **MCH** explained that the group meets quarterly and has met already in March 2020, therefore there are concerns about the piece of work being done by UK Finance in relation to the OBIE.
- 3.18. **AE** stated that they were in the process of setting up a call with **MCH**, but this has not happened yet. **MCH** put that down to diary issues but indicated a keenness to proceed. **AE** stated that he was happy to proceed.
- 3.19. **FR** stated that this was raised with **PM** in December 2019 and certainly before Covid-19 and its now March 2020 and the group that should have been consulted with have not been contacted. **FR** raised an issue of integrity and transparency in due process and this would not be acceptable if it was a different stakeholder group. **FR** stated that the consumer representatives are keen to see UK Finance to up its game considerably in the way it is engaging the consumer advocates. **FR** stated that herself and **MCH** have tried to support but that there are potentially cultural issues that need to be taken back and addressed.
- 3.20. **AE** took the feedback onboard and stated that they would be engaging with the consumer representatives.
- 3.21. **IG** asked if it was ok to close the action item with regards to this topic - action #445 (*The future of OBIE – PM and FR to engage re consumer representation at the steering groups*). **FR** explained that it was ok to close the action as the meeting took place and papers were provided to be presented to the advisory forum, but nothing has happened yet. **FR** stated that herself and **MCH** have done their bit as IESG representatives and it is now up to UK Finance now, however, this is disappointing as there has been no explanation as to why there has not been proper representation from the consumer representatives.

### 3.c. AOB - POLICY

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- 3.22. **FR** asked to add an AOB item on some consumer policy items which currently do not have a home, such as, the increasing need for a common language for consumers, effectiveness of API endpoints, balance visibility etc.
- 3.23. **FR** stated that in thinking of the Roadmap, there is a bit of a lull in building up functionality. **FR** wondered if there are any key policy issues or overarching policies that are yet to be discussed in an open format. With regards to overarching policy discussions, **FR** referred to policy discussions citing the following examples: PIS - this could be around consumer protection or e-commerce settings; in an authorised push back scam – what should happen, is there a policy position on balance stability?
- 3.23. **FR** explained that feedback is provided in different forums and it would be good to open some of these points for discussions.
- 3.24. **IG** suggested picking this up offline as he would be interested in some of the concrete examples and invited interested IESG members to reach out to **AA**.

**ACTION – Policy Point - IESG\_2020\_301\_450 - FR / AA/IG to pick up on the policy point and possibly get people together to discuss.**

**Due date – 29 April 2020**

- 3.25. **IG** thanked everyone for making the online collaboration work; this is different, difficult and a suboptimal way of doing this. **IG** thanked all IESG members for co-operation on this, stating that if there are any suggestions on how to improve the format to please let **SC** or himself know.

3.26. IG closed the meeting.