

Meeting Minutes

Meeting details

Meeting date: 24 June 2020

Meeting name

Implementation Entity Steering Group (IESG)

Meeting time

10.00 – 13.00

Meeting location

Microsoft Teams Virtual Video Conference

Scribe

Sally Chiwuzie

Classification

Public

Name		Role	Attendance
Alan Ainsworth	AA	OBIE – Head of Policy	Yes
Bill Roberts	BR	Competition and Markets Authority (CMA)	Yes
Candy Ma	CMA	OBIE – Office of Trustee	Yes
Carly Nimmo	CN	HMT	Yes
Caroline Ambrose	CA	Barclays Bank	Yes
Chris Michael	CM	OBIE – Head of Technology	Yes
Daniel Ehreich	DE	Bank of Ireland	Yes
David Bailey	DB	Santander	Yes
David Fineberg	DF	OBIE – Head of Monitoring	Yes
Ed Colley	EC	OBIE – Programme Director	Yes
Faith Reynolds	FR	Independent Consumer Representative	Yes
Gary Sheen	GS	Tesco Bank	Yes
Gavin Littlejohn	GL	Fintech Representative	Yes
Ghela Boskovich	GB	Fintech Representative	Yes
Helene Oger-Zaher	HOZ	Financial Conduct Authority	Yes
Hetal Popat	HP	HSBC	Yes
Ian Major	IM	TPP Representative	Yes
Imran Gulamhuseinwala	IG	OBIE – Trustee/Chair	Yes

Kate Frankish	KF	Pay.UK	Yes
Mark Chidley	MCH	Independent SME Representative	Yes
Matt Cox	MC	Nationwide Bank	Yes
Nicola McCleery	NM	Danske Bank	Yes
Phillip Mind	PM	UK Finance	Yes
Roy Hutton	RH	Allied Irish Bank	Yes
Sally Chiwuzie	SC	OBIE IESG Secretariat	Yes
Thear Sabri	TS	Electronic Money Association	Yes

Apologies

Name		Role	Delegate
Daniel Globerson	DG	Royal Bank of Scotland	Stephen Wright (SW)
Robert White	RW	Santander	David Bailey (DB)
Simon McDougall	SMD	Information Commissioners Office	Jenny Vega Destello (JVD)
Stephen Smith	SS	Lloyds Banking Group	Richard Rous (RR)

No. Agenda item

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

- 1.1. **IG** welcomed IESG members to the Microsoft Teams virtual video conference, stating that he was happy to see everyone safe. **IG** started by clarifying housekeeping rules – stay muted unless speaking, use the ‘raise hand’ feature or side chat which himself or **SC** would pick up. **IG** stated that there has been one AOB request from **GL** regarding an update on the 90-day re-authorisation, adding that further requests should be put through via the side chat.
- 1.2. **IG** advised IESG members that other than a minor amendment from **FR**, there was no feedback received on the minutes. On that basis, **IG** approved the minutes from 21 May 2020.

APPROVAL – IESG_APR_LOG_074 – May IESG Minutes - IG approved the minutes from the May IESG.

- 1.3. **IG** used this opportunity to inform IESG members that as of the next IESG on 30 July 2020, the PSR would be in attendance, adding that it was at their request. **IG** explained that considering the working groups set up, Genevieve Marjoribanks and Hilary Platern would be helpful additions to the membership list.
- 1.4. **IG** kicked off the discussions about open actions on slide 26, inviting IESG members to walkthrough with him and interrupt where required.
- 1.5. **IG** started with action #457 (Programme update - Conformance - **EC** / **SC** to update the new Conformance slide to indicate that these are the points of conformance as opposed to the point at which security (or any other) standards are being implemented). **IG** informed IESG members that the slide has been updated accordingly and **EC** would be walking through this during the programme update section of the pack.

- 1.6. With regards to #458 (Programme update - Recertification – OBIE [DF] to provide an update to IESG covering frequency and triggers for security, functional and CEG re-certification), **IG** explained that this forms part of agenda item 2.b which **DF** would be talking members through. On this basis, **IG** agreed action closure.
- 1.7. **IG** stated that #459 (Programme update - 90-day re-authorisation - OB to meet with the FCA and HMT to consider if there is anything the OBIE can and / or should be considering to make this process easier) would be dealt with by way of an update from **GL** in the AOB section. On this basis, **IG** agreed action closure.
- 1.8. With regards to #460 (Programme update - 90-day re-authorisation - **IG** to confirm to **RH** (offline) where the mandate for the development of 90-day re-authorisation comes from), **IG** thanked **CM** for reaching out to **RH** in conclusion of this action, stating that the action can, therefore, be closed.
- 1.9. **IG** reminded IESG members that action #461 (Revised Roadmap Consultation Update – **IG** / **GS** to have an offline discussion regarding the risk of creating a two-tier market) required a meeting between himself and **GS**. **IG** stated that it was a good conversation about several issues including impact on customer experience and choice. **IG** explained that they also discussed what all this means for competition. **IG** proposed to close this item, **GS** agreed. **GS** stated that Tesco Bank is now impact assessing reverse payments, the result of which would be ready next month. **IG** asked **SC** to speak to **GS** to determine if he requires a slot for the July IESG.
- 1.10. There were no further comments or suggestions, **IG** moved the agenda on to the programme update section on slide 27.

Meeting Minutes

ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2020_301_457	21/05/2020	EC	Programme update - Conformance - EC / SC to update the new Conformance slide to indicate that these are the points of conformance as opposed to the point at which security (or any other) standards are being implemented.	Update 24/06 - Closure agreed. Update 17/06 - Conformance slide updated. EC to talk through during programme update. Propose to close.	24/06/2020	Closed	24/06/2020
IESG_2020_301_458	29/04/2020	EC	Programme update - Recertification – OBIE (DF) to provide an update to IESG covering frequency and triggers for security, functional and CEG re-certification .	Update 24/06 - Closure agreed. Update 17/06 - This is an agenda item in the June IESG Pack under agenda item 2.b. Propose to close.	24/06/2020	Closed	24/06/2020
IESG_2020_301_459	29/04/2020	IG	Programme update - 90-day re-authorisation - OB to meet with the FCA and HMT to consider if there is anything the OBIE can and / or should be considering to make this process easier.	Update 24/06 – IG suggested that this action should be closed and further matters arising out of this discussion should be raised as new actions. Update 08/06 - Several conversations have been held between OBIE and FCA / HMT. An All-Hands meeting has been scheduled for Wednesday 10/10 and further session on 22/06. Verbal update to be given at IESG.	24/06/2020	Closed	24/06/2020
IESG_2020_301_460	29/04/2020	IG	Programme update - 90-day re-authorisation - IG to confirm to RH (offline) where the mandate for the development of 90-day re-authorisation comes from.	Update 24/06 - Closure agreed. Update 15/06 - Email confirmation sent from CM to RH which was acknowledged by RH. Propose to close.	24/06/2020	Closed	24/06/2020
IESG_2020_301_461	29/04/2020	IG	Revised Roadmap Consultation Update – IG / GS to have an offline discussion regarding the risk of creating a two-tier market.	Update 24/06 - Closure agreed. Update 15/06 - Meeting held on 16/06. Propose to close.	24/06/2020	Closed	24/06/2020

1.c PROGRAMME UPDATE

1.c.i OBIE STATUS REPORT

- 1.11. **IG** introduced the programme update on slide 28 and asked **EC** to provide some highlights, after which he would call for questions and clarifications. **IG** was interested in an update on the CASS consultation which is moving swiftly to publication.
- 1.12. **EC** stated that the status remains green, with the key focus being preparations for the industry consultations which are due to start next month (July 2020) for the MI workstream and Customer Evaluation Framework. **EC** thanked the CMA9 who have been able to provide information on the Crisis Impact Period (CIP) stating that the decision is now in the deck for discussion.
- 1.13. With regards to the standards, **EC** stated that the CASS consultation did progress, adding that details of results of the consultation, propositions and the standards for functional and customer experience are in the deck for agreement. **EC** stated that this progressed well despite the current crisis.
- 1.14. **GL** asked for update on sweeping. **EC** stated that preparation for the eventual consultation is ongoing with nothing further to report.
- 1.15. **HP** asked for an update on NESTA. **EC** stated that the latest result and data are being collected, with the communications campaign being finalised. **EC** stated that the final judging was put back due to the crisis, however, there is no cost increase on the programme.

1.c.ii CMA9 STATUS REPORT

- 1.16. **IG** moved on to slide 29, explaining that this is the report from the CMA9. **IG** stated that the crisis has had an impact, however, RAG status appears to be improved since the prior month. **IG** was particularly keen to see who has moved to green.
- 1.17. **EC** confirmed that a number of the CMA9 have improved their positions to green. **EC** stated that there are plans to come in for v3.1.5. which is represented on a new column in the status report. **EC** wanted IESG members to note that some of the plans are subject to some Covid19 risks, although they are tracking to plan.
- 1.18. Of the Red status items, **EC** explained that BOI are under long standing directions and there was, therefore, no need to dwell on that. With regards to Cater Allen, **EC** stated that although they are red, they have progressed baselining plans for the completion of their migration from old platform to new. **EC** stated that although they will remain red for a couple of months (September time frame), the programme should see the completion of that delivery at the end of this quarter. **EC** added that plans have been submitted in the last few days which allude to updates to the later versions of the standards, therefore, the expectation is that there will be improvements in the next reporting period.
- 1.19. **EC** opened the floor to comments from CMA9.
- 1.20. **IG** felt that through the bilaterals, constructive conversations have been held with the CMA9 which are reflecting – ambers are turning to green and red to ambers.
- 1.21. **GL** found it difficult to follow the chart, stating that the chart indicates that some of the CMA9 have not delivered anything as it starts from version 3, therefore delivered versions are not visible. **GL** cited Santander as an example, stating that he knows that they have something in the market and yet they are showing Amber thrice and version 3 is showing as ‘not applicable’. **GL** wanted to understand the versioning. **IG** reminded IESG members that the transparency calendar holds the most comprehensive response, but invited **EC** to comment. **EC** confirmed that Santander is on version 3 but have some outstanding deployments which makes them amber on that delivery. **EC**

added that it does not mean that they are not on V3.1 but have deliveries to complete - future dated and the multi authorisation which is in the commentary.

- 1.22. **DB** did not have much to add from a Santander point of view, stating that the outstanding deliveries are minor, hence they are Amber, but this is expected to change. **GL** asked if the chart will be changing to green across V3.1.5. **DB** commented that the expectation is to change to green up to V3.1.5 by end of August 2020.
- 1.23. **EC** drew **GL**'s attention to the next slide (slide 30) which had information about the certification and detailed all the live versions that have been certified. Santander – 3.1.2 for AIS and 3.1.0 for PIS
- 1.24. **IG** thought this was a good time to move on to the certification slide.
- 1.25. **EC** explained that this is certification (and does not mean that banks have not deployed and are not conformant). **EC** asked IESG members to note the yellow rings around some of the items which indicates the changes since the last IESG. **EC** stated that in terms of significant updates since this pack was issued, HSBC has now had certification for FAPI as of Monday 22 June, so this deadline date was hit.
- 1.26. **EC** drew attention to some improved positions - where they were without dates for delivery, the green status gives expectation of certification – expected date for completion. **EC** stated that last month indicated that there were no clear dates for completion, using Santander and Cater Allen as examples as they did not have dates for CBPII. **EC** added that the Amber status for FAPI on Barclays reflects implementation which requires prerequisite changes being performed by TPPs.
- 1.27. **GL** asked for updates on the Customer Experience Guidelines (CEG) that are under discussion. **EC** stated that the CEGs which are under discussion represent some deviations from the agreed CEG Barclays and their approach to joint account, which is under discussion for resolution and getting further understanding from consumers. **EC** stated that LBG position (though this is nothing to do with joint accounts) was similar and Santander has some changes which are imminent, though one of their implementations has to do with the CRM code which are under discussion.
- 1.28. **IG** explained that '*under discussion*' means that there are discussions ongoing between the OBIE and the CMA as to how to treat and rectify some of the misses on the CEG. **IG** stated that it has taken so long because a thorough review was undertaken at the end of last year (2019), the analysis has been updated; the team is now in a good position to take another look at this and fix some of the outline pieces. **IG** stated that in parallel, some of the banks that are in question are trying to fix them themselves and not all are considered material, nonetheless misses on the CEG are taken seriously, therefore, there are discussions on what to do next. **IG** added that there is a backlog that started with Roadmap reviews, but this is high priority.
- 1.29. **MCH** asked about the grey boxes. **MCH** was aware of ongoing discussions at the bilaterals but stated that there appears to have been a review of CEG, however, this is not appended to **DFs** paper. **MCH** wondered if there was any reason why this cannot be shared. **IG** explained that this is a take-away and he would come back to what the gaps on the guidelines are.
- 1.30. **MCH** stated that there is an interest in understanding from a consumer point of view regarding the extent to which there are issues with the guidelines. **IG** was not suggesting that there were no issues with the guidelines, but this discussion was around adherence to those guidelines. **IG** asked for confirmation that what is being referred to is the 'gaps. **MCH** confirmed. **IG** stated that there is a need to understand what the gaps are and how to provide more transparency to the wider group.
- 1.31. **IG** stated that this falls within the public domain as anyone can go through the customer journeys and tick off the CEG's. **MCH** hoped that membership to this group would remove the drudgery.

- 1.32. **RR** stated that with regards to the CEG's, he had been in discussions with **FR** about conducting some research to prove that customers find it useful and consider it a form of protection to see their balance as part of the PISP journey. **RR** was happy to discuss further.
- 1.33. **DF** stated that later in the pack (*agenda item 2.b*) expectations on CMA9 on ongoing performance as well as giving a flavour to the monitoring function on assessing conformance to the various standards as they evolve would be discussed.

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

- 1.34. **IG** moved on to KPIs from slides 33 onwards and turned back to **EC** stating that it feels like the metrics are nudging in the right direction.
- 1.35. In terms of availability and response times, **EC** stated that there has been an improvement, adding that the successful API ratio has improved, and the overall successful volume of API calls is flat. **EC** stated that there is no significant update during the month (short of 10 million API calls from one of the CMA9), there is a bit of growth but not like it was prior to the crisis.
- 1.36. In terms of availability, **EC** drew attention to Cater Allen who are now reporting, they are not reporting on PIS because they are now in managed rollout, however, it is good to note that there is another brand reporting.
- 1.37. In terms of the successful API calls on slide 34, **MCH** stated that there is a graphical representation of the levelling off and there was a big uptake in March was presumed to be owing to the migration, **MCH** asked if there are any observations to make about the apparent levelling off at a time when it seems that people are turning to these kinds of services as it seems counterintuitive to what is being heard more widely. **EC** stated that there is no significant evidence, adding that there is a level of lowering in marketing activities which has happened with a number of the TPPs where consents and new services are not being picked up. **EC** did not want to give the impression that some of the responses from the TPPs are not having an impact.
- 1.38. **IG** did not think OBIE should be the authority for commenting on the month by month numbers. **IG** stated that anecdotally, with the knowledge of the TPPs and broader FinTech communities, it seems that of those entities are really conserving cash because they are worried about future funding rounds and therefore, customer acquiring is not happening much. **IG** added that there is now more of an impact on the 90-day re-authentication, meaning that numbers are dropping out of this as well. **IG** added further that some of the FinTech's are saying that the Covid-19 crisis response comes into effect after the crisis itself – in terms of vulnerability, the debt charities, access to credit, affordability, etc. – there is a lag on this. **IG** did not want to hold OBIE out to be fountain of all knowledge as range of factors.
- 1.39. On 90-day re-authorisation, **RH** stated that it keeps coming up and there is an issue with the proposition that the TPPs have and was not comfortable with it being presented as the issue that is preventing customers from using it. **IG** stated that he was not saying it is because of 90-day re-authorisation, but that it acts as a trigger point perhaps because it is complicated, or it is required, or the proposition is not good enough. **IG** was not saying why it is happening, but there is a drop off around 90 days.
- 1.40. **HP** stated that it seems like there is a surge through Q1 as screen scrapers moving to APIs which is complete. **HP** was surprised that there has not been continued growth since then as propositions have fed through. **HP** was confident that this might be a timing issue with firms distracted by other issues. **HP** stated that funding has been delayed and so people are waiting for some stability.
- 1.41. In building on the analysis, **GL** stated that there is another relationship between the marketing budget, venture capital and 90-day re-authentication. **GL** stated that many of the firms in the TPP communities are sitting on large budgets which they will not deploy if there is 90-day re-authentication. **IG** suggested covering this off as part of the AOB (**GL's** update on the 'All Hands' meeting).

- 1.42. **MC** explained that for organisations and TPPs that migrated from screen scraping to the APIs, there is a lag on impact on their propositions by not being able to access savings, mortgage, personal loan data (his perspective from conversations) and this is a factor.
- 1.43. **GL** agreed with this as a relevant point and companies had seen this coming for a long period and tried to find other paths, but whilst these should not be considered trivial, they are not in the same ballpark of importance as in comparison to 90-day re-authorisation.
- 1.44. **IG** stated that the purpose of this section is to talk about the CMA9 KPIs as opposed to the aggregate growth of the ecosystem, but he could tell that this is what people want to discuss. **IG** stated that this would be thought through.
- 1.45. **EC** drew attention to the TPP tickets on slide 52. **EC** stated that there has been a general improvement through the month and tickets are getting cleared. **EC** assured IESG members that the OBIE is working with HSBC to reduce the ticket volume, which **HP** stated are being steadily being worked through.
- 1.46. **IG** stated that **FR** wanted a section to talk more about the ecosystem more broadly, stating that this could be used to bring about more discussions on overall growth.

***ACTION – IESG_2020_301_462 - Programme update – The IESG July agenda to include a general discussion on the ecosystem including aggregate and overall growth.
Due Date – 30 July 2020***

2.a OBIE STANDARDS V3.1.6

- 2.1. **IG** turned to slide 58. **IG** introduced this agenda item which he said relates to the outcome from the CASS consultation and the actual standard that captures it both as it relates to the API and the Customer Experience Guidelines. **IG** stated that it makes sense to deal with each of the 3 items in turn.
- 2.2. For the first paper - Proposition - A2 (b)(iii) Consent and Access Dashboards (P15) - **IG** understood that CASS made 2 recommendations to OBIE to formally consider and the OBIE (following discussions with the ecosystem) decided to take the first one forward. **IG** added that this has gone through various governance forums.
- 2.3. **CM** explained that there were two proposals –
 - 2.3.1. Firstly, to provide more detailed status code for the status of accounts in the read API - whether switched or in process of switching; and
 - 2.3.2. A push notification to cover both AIS and PIS status to mitigate the TPPs to poll for that status.
- 2.4. **CM** stated that these were taken through a number of forums and there were consultations with a wide number of TPPs. **CM** stated that recommendation number one was chosen, adding that this was supported by PMG and TDA – a decision to enable the status code at the account level so that when calling the account end point, the TPP could get the status of whether or not the account had been switched or not. **CM** stated that a number of respondents questioned the grounds for providing that information and CASS confirmed that this is already covered and customers at the point of switching agree for their status to be provided. Based on that, **CM** stated that a link which explains in more detail has been published, **CM** stated that this this has gone through a formal consultation and structured feedback, leading to updating this paper accordingly.
- 2.5. **IG** thanked **CM** stating that this was comprehensively reviewed and there was good agreement and a consensus. **IG** did not consider this to be contentious and opened the floor to comments. **MCH** asked if **CM** could confirm that this is mandatory for CMA9.

- 2.6. **CM** stated that the standards need to be useable by all ASPSPs even outside the UK and outside of PSD2. **CM** confirmed that the definition of *conditional* is that they may be mandatory for one or more firms for a regulatory reason. **CM** explained that *mandatory* means that it does not work without it and *conditional* means that it in some cases, it is *mandatory*. **CM** confirmed that in this case, *mandatory* means that it is compulsory for the CMA9.
- 2.7. **HP** thanked **CM** for progressing the terms and conditions point giving how GDPR escalated into something that was unavoidable. **HP** asked **CM** to ensure that the Pay.UK / CASS feedback is shared so that it does not re-appear as a problem. **IG** concurred with this, stating that this was better than having to defend positions eventually.
- 2.8. **CM** said that the CASS feedback has been copied verbatim and there is a link to that in this paper. **CM** stated further that CASS confirmed that this has been shared with all their members. **CM** also stated that any further clarifications / ratification will be made. **IG** stated that this should be taken offline and sometimes even an email would suffice.

ACTION – IESG_2020_301_463 - OBIE Standards V3.1.6 – CM to share and / or clarify the Pay.UK / CASS feedback from a legal perspective.
Due Date – 30 July 2020.

- 2.9. **IG** thanked all for converging on a solution that is quite elegant, stating that some of the early suggestions on how to deal with CASS were heavy, while this solution provides the same effect without a lot of the engineering. **IG** approved the standards.

APPROVAL - IESG_APR_LOG_075 - Proposition - A2 (b)(iii) Consent and Access Dashboards (P15) - CASS Standard - consensus on the content of the paper presented at IESG on 24 June 2020 so that the Trustee can approve the publication. The final version will be published on 30 June 2020. There was no objection to consensus and IG approved this to be published which starts the clock on the 6-month implementation and certification one month thereafter.

- 2.10. **IG** moved on to the next paper – The Read-Write API Specification v3.1.6.
- 2.11. **CM** explained that the Read-Write (RW) included updates to reflect the CASS decision and the other is the TDA decision (223) – a request that came from HSBC to extend the account name build. **CM** stated that there are certain instances where there are longer account names. **CM** stated that this may apply to other firms and this is conditional, and firms can use longer fields than the 70-character specification. **CM** stated that there are minor clarifications but confirmed that the specification was approved at TDA.
- 2.12. **IG** understood this to be technical, but believed that it has gone through all governance forums as required. **IG** approved this to be published, stating that it starts the clock on the 6-month implementation, with certification one month thereafter.

APPROVAL - IESG_APR_LOG_075 - Read-Write API Specification V3.1.6 - Consensus sought on the content of the paper presented at IESG on 24 June 2020 so that the Trustee can approve the publication. The final version will be published on 30 June 2020. There was no objection to consensus and IG approved this to be published which starts the clock on the 6-month implementation and certification one month thereafter.

- 2.13. **IG** stated that there is one final paper – Customer Experience Guidelines v3.1.6.
- 2.14. **CM** explained that there are 3 elements to the CEG which were updated.
- 2.14.1. Clarifications on the decision on CASS, more specifically, clarifying to all participants that the TPP permission does not get switched when the current account switches from one ASPSP to the other.
- 2.14.2. Clarity around definitions of the messaging, including the availability of the switching item.
- 2.14.3. Minor reported errata fixes to CEG & TPP guidelines.

- 2.15. **CM** stated that this is non-mandatory, just guidance. **CM** added that this went out to consultation between 15 and 29 of May with 14 pieces of feedback received and responded to, following on from which the Standards were updated accordingly.
- 2.16. **IG** asked if there were any objections, stating that this has been through good consultation and governance. **IG** approved this paper, stating that publication starts the clock ticking for implementation within 6 months and certification to follow one month thereafter.

APPROVAL - IESG_APR_LOG_077 - Customer Experience Guidelines v3.1.6 - Consensus sought on the content of the paper presented at IESG on 24 June 2020 so that the Trustee can approve the publication. The final version will be published on 30 June 2020. There was no objection to consensus and IG approved this to be published which starts the clock on the 6-month implementation and certification one month thereafter.

2.b SECURITY, FUNCTIONAL AND CEG CONFORMANCE

- 2.17. **IG** moved on to a short memo on *Security, Functional and CEG Conformance* which was to clear up any misunderstandings around timings of certification conformance. **IG** asked **DF** to accept this as read, however, to pull out a couple of highlights.

- 2.18. **DF** stated that this paper covers the external FAPI security profile with certification from the OI DF and the internal OBIE specification with respect to functional conformance, and then moving on to customer experience. **DF** pulled out a couple of points

2.18.1. On the ongoing FAPI conformance – the important point to pull out on page 64 is noting that once the original and initial FAPI conformance with certification from OI DF has been obtained, whenever on an ongoing basis, there is material change made by the CMA9 on an infrastructure that might have implications, there is an expectation that the FAPI conformance suite will be re-run at that point. This should always be re-run in the relevant preproduction environment before changes are released into production with an attestation provided to the Office of the Trustee Monitoring Function. Within a month of the change, the CMA9 will be required to renew their certification and importantly, at least every 12 months if there are no material changes in that period.

2.18.2. In terms of the functional conformance, a number of the CMA9 have got current certifications based on older versions of the specifications compared to the versions they are currently using in production. The first observation is the requirement for the CMA9 to bring their certification up to date and similarly, re-running the functional conformance suite whenever there is a new version of the Standards, including patch releases, and when there are any material changes to the API's in-between such Standard implementations. This is required where changes are released into production and within one month. The CMA9 would be expected to obtain a certificate from OBIE.

2.18.3. With regards to CEG, all the CMA9 are expected to be conformant to V3.1.3 and whenever a new version of the CEG in the standard, the CMA9 need to conform with those aspects of the Standards within one month of implementation, to attest that they have conformed.

- 2.19. **DF** stated that the aim is to provide a consistent approach to conformance and opened the floor to questions. **IG** thought this was helpful with clarifying scope with no misunderstanding and also underlines what best practice is. **IG** stated that this is something that should have been addressed at the start of the programme, but as a group, IESG members have got used to seeing and questioning conformance charts, this is a helpful steer for the CMA9 to understand what they need to do and by when. **IG** stated that it speaks to what good looks like in terms of standards and implementations.

- 2.20. **GL** found this helpful, stating that from the TPP community and the wider environment of PSD2, the things that are written in these pages are precisely how they should be done. While **GL** was delighted to see these things brought forward, he explained that it raises other market questions from a UK perspective as to how the rest of

the market are brought into line with this best practice. **GL** stated that once all done the qualities of the CMA9 vs the rest of the market would be remarkably different.

- 2.21. **IG** did not have an immediate response to this but stated that the more transparent the OBIE can be about processes and practices, the more the OBIE can lead by example, the more others will follow. **IG** stated that it is a matter for the others and their relationship with FCA, TPPs and their own customers. **IG** thought it was a good point.
- 2.22. **RH** was supportive but was not keen on the patch release methodology, expressing a preference for it to be based on outstanding releases. Given the number of patch releases, **RH** thought it was overly burdensome and not particularly an easy process to run.
- 2.23. **CM** stated that this has been worked on over the last two years with a number of CMA9 – addressed a few issues around making the conformance tool easier to run, addressed issues on payment types (e.g. VRP). **CM** stated that in principle, if an ASPSP is going from one patch release to another, there are some that are not relevant because there are no changes made. **CM** stated that if a patch release is just an extension to the number of fields, then the impact and time to run the tool should not be big. **CM** understood that it might be a bit more work for the patch release, the internal work is best practice as it gives the product owner the assurance that it has been done properly. **CM** stated that the argument that it is more work is vastly outweighed by the benefits both internally and externally to the ecosystem.
- 2.24. **IG** hoped that this answers **RH** questions, stating that the intent is not to create more work, adding that he would like to maintain the policy as laid out in the document and encouraged **RH** particularly in the bilaterals (**CM** to help) to understand the process and what is required to run the tool. **IG** asked **RH** to give the team a sense of what their QA is before releasing patches. **IG** stated that a view would then be taken on whether it is something for TDA to deal with.
- 2.25. **RH** stated that the way the document is written suggests that every time a patch is released, all banks must do the test. **RH** suggested clarification that if a patch is not released, it is not applicable to the bank and the test does not have to be done. **RH** stated that the clarification would give the banks a bit of leeway.
- 2.26. **IG** was sympathetic. **IG** proposed that this needs to be discussed in the bilaterals and then approved by the team. In the theory, **IG** stated that it makes sense, but there needs to be a transparency on whether a patch is applicable or not and should include the opportunity to challenge.
- 2.27. **CM** asked **DF** to confirm that if a standard is released and a firm does not implement that patch, then there will be no requirement to run the tool to certify.
- 2.28. **DF** agreed stating that the key word in page 65 is the word 'implement'. **DF** stated that whenever a bank implements a new version including a patch release, then there is a requirement to run the tool, but if there is no patch release, it will not be there.
- 2.29. **CA** welcomed the clarity that this gives around expectations and thanked **DF** and his team. **CA**'s only worry was the inference that the test will be run in a test or preproduction environment. **CA** stated that in Barclays, this is run in production.
- 2.30. **DF** followed **IG**'s previous steer and asked for a bilateral conversation to go through this in detail. **DF** asked if **CM** could attend.
- 2.31. **CM** asked if **CA** would run the tool in the production environment in the same process as making it live. **CA** asked to take the discussion offline but stated that they would normally run it very quickly after putting it in production which is what they have been doing to date. **CA** stated that the fundamental limitation of their set up is that they do not have the ability to test the conformance suite to their test environment. **CA** stated that they can get to a

high level of confidence in terms of conformance with any changes made but wanted to make this comment during this discussion.

- 2.32. **HP** stated in the side chat: *Caroline's comment applies equally to HSBC - conformance testing is in prod only*'.
- 2.33. **SW** stated that this comment was the same for RBS – they always run in production after they have delivered and would not be able to run in test.
- 2.34. **CM** asked if it is an acceptable alternative be run in preproduction prior to going live or run the tool in production immediately it has gone live. **SW** agreed with the latter. **HP** stated that the practical issue is that the test cannot access the internet so by definition they are protected and firewalled.
- 2.35. **IG** was wary of being dragged into too much technical detail, but asked **SC** to minute to include **CM**'s point – if a bank is going to run in production, it should run this as soon as possible after it goes live. **IG** also asked **SC** to minute that **CM** will do another round of this at TDA and confirm that everyone is comfortable and bring back to **IG**. **CM** invited **DF** to attend the next TDA.
- 2.36. **MCH** joined this up with the point earlier on CEG – transparency of guideline conformance. **MCH** thought it would do well as one action so that nothing gets lost.

2.c THE REFUND DATA SECURITY WORKING GROUP

- 2.37. **IG** introduced this paper, stating that it relates to a requirement by the CMA in their decision document to set up a working group to look at data security for future versions of the standards as it relates to refunds.
- 2.38. **AA** explained that the OBIE was asked by the CMA in its decision document to create a working group and report on progress by end of June 2020. **AA** stated that it relates to data security and refunds specifically. **AA** stated that a ToR has been set up, adding that CMA9 representation is yet to be agreed. **AA** encouraged the CMA9 to bring forward their representations.
- 2.39. **AA** was interested in comments on the ToR offline, adding that this would be the first agenda item on the working group agenda.
- 2.40. **IG** stated that comments should be high level and was pleased to announce that the ICO is committed to taking this forward. **IG** reiterated **AA**'s comments seeking CMA9 volunteers.
- 2.41. **DJ** raised two points on **FR**'s behalf, stating that **FR** is supportive of this process and its progression. With regards to scope, **DJ** stated that there is a security risk with regards to unregulated entities receiving sort code and account number. **DJ** explained that **FR**'s concern is around the fact that this could be passed on to non-regulated entities (e.g. merchants) – a small but significant point and hopefully non-contentious. **DJ** explained the second point – consideration required with regards to how security expertise is brought in. **DJ** asked if there are any security experts on the working group or commissioned work from an expert that works for a security expert. **DJ** thought that this could form the basis of the first agenda.
- 2.42. In response to the latter question, **EC** stated that if security or fraud expertise is required, it should be directed into this working group which will then report back into IESG.
- 2.43. **GL** commented by stating that the inclusion of a security expert might be lopsided as the rest of the conversation will be policy orientated as the group is not technical. **AA** thought that the working group could find a way to work round the issues raised by **FR** and **DJ**
- 2.44. **IG** stated that these are good points, the ToRs are not step in stone and as the group explores its limitations, it will be able to address them.

- 2.45. As there were no other comments, **IG** wrapped up by reminding IESG members that **AA** is open to nominations. **AA** stated that a nomination had just come in by email. **IG** asked when the first meeting is scheduled for. **AA** confirmed that the meeting will hold on 29 July 2020 and hoped that the date would be suitable for the CMA9 representative to avoid a reschedule.

2.d END USER RISK COMMITTEE (EURC) UPDATE

- 2.46. **IG** introduced this paper, observing that EURC is not yet showing risks but will do so eventually.
- 2.47. **AA** thanked those who are helping, stating that he is aware of pressures on time. **AA** explained that this started with 34 risks all raised by the consumer representatives who had reached out to others whilst putting those risks together so that it was not the views of one person only; and added that most (if not all) categories will be familiar to members of this group.
- 2.48. **AA** explained that the EURC ended up looking at four risks which were thought to be emblematic, but did not get to any real conclusions in terms of what should be escalated because they found that if they went too narrow, there were overlaps and if too broad, some nuances were missed. **AA** stated that there is still work to be done to ensure that the processes are correct and to ensure that impact and likelihood are rated appropriately.
- 2.49. **AA** stated that the group is in a good place to work through what risks are actionable and should therefore be presented to IESG. **AA** explained that there is a limit to what can be done because of the construct of PSD2 – the risks must be actionable and in scope. **AA** also explained that duplication of effort needs to be avoided.
- 2.50. **IG** reiterated that the point of the group is to identify risks which can then be escalated to IESG who will decide what to do with them. **IG** was looking forward to receiving the first cut of these.
- 2.51. **IG** opened to comments or questions from around the group, inviting feedback from any IESG member who thinks that this is not moving in the right direction.

2.e CRISIS IMPACT PERIOD (CIP) REVIEW

- 2.52. **IG** introduced this final agenda item asking for an overview from **AA** as he has been the point of contact for putting together the OBIE recommendation around this topic.
- 2.53. **IG** stated that the CIP needs to be determined by the CMA in conjunction with the Trustee and this is the point where OBIE presents their recommendations to IESG; IESG members can then make representations to the Trustee who will consider these.
- 2.54. **AA** started by explaining that the recommendations are threefold.
- 2.54.1. OBIE has concluded that the CIP should not be extended beyond end of June 2020 - the current assumptions within the timetable in the Roadmap stand.
- 2.54.2. Industry consultations on MI, Customer Evaluation Framework and the bilateral investigations on Root Cause Analysis should start next month – this comes as a result of recommendation 1.
- 2.54.3. Providers can apply for deferral if they have specific capacity constraints that will require delays to implementation of phase 2 of reverse payments or the CASS standards that were discussed earlier. These are the only two implementations which will arise after the end of June which is the end of the CIP.
- 2.55. In discussing the principles behind this, **AA** stated that over the last 3 months, banks have had to deal with the diversion of, and depletion of resources and new priorities, and this has led to all regulatory authorities pulling back from non-urgent requirements. **AA** commented that the way banks have responded has been admirable, despite the media and other commentators' portrayal.

- 2.56. Whilst the crisis is not over, in terms of that diversion and depletion of resources, **AA** stated that the evidence suggests the situation has stabilised. **AA** stated whilst going into lockdown was a specific event, coming out of lockdown has proven to be a much-protracted process and not binary for any individual or organisation. Despite productivity not being back to 100%, **AA** stated that the OBIE believes that the requirement with regards to consultation is achievable, asking IESG members to note that some providers already engage in consultation activities. **AA** added that feedback suggests that some change activity is now looked at by some change providers.
- 2.57. **AA** explained that the resourcing requirements around consultation which are in the Roadmap are designed to be less onerous than they were during the previous Roadmap because there is more work being done upfront by the OBIE with a less onerous requirement for participation in the consultation activities. **AA** stated that if the Trustee and CMA agree that the crisis is over at the end of June, the requirement in terms of consultation activities on the CMA9 are much less than they would have been. **AA** added that the engagement required on sweeping and VRP will be more in-depth and this is accepted, but these are some way in the future and it is hoped that the stabilisation will be greater and productivity levels higher – these are post September 2020 and some of the feeders has been based on schools resuming following the summer holidays.
- 2.58. In terms of implementation, **AA** stated that the immediate requirement around CASS and reverse payments are relatively light, however, the recommendation is that deferrals should still be available with discussing with OBIE Office of the Trustee Monitoring Function during the bilaterals.
- 2.59. **IG** highlighted for IESG members benefit that a part of the input is required from the CMA9, stating that the request was - *please tell us about resource that has been diverted and depleted as a result of the crisis and tell us how that resource will look like going forward*. **IG** stated that the response has been helpful, and a number of the banks were being honest especially on impact on productivity especially during the difficult part of the crisis. **IG** stated that there was talk about productivity being impacted by 30 – 40% , losing resource to diversions, etc., but now coming back as a result of those additional changes being made (especially to do with the contact centre). **IG** added that there were some issues with testing in India, and there was support. **IG** stated that there is a need to be agile and sensitive to a second wave whilst appraising the plans. **IG** stated that **AA** had captured everything but was keen to use this forum to get a steer on recommendations, stating that IESG members are not asking for the Roadmap to be changed but acknowledged that this part of the recommendations is not something that was envisaged when the Roadmap was created.
- 2.60. **MC** was thankful for the approach to the crisis impact and the forbearance was pragmatic. **MC** stated that there is a new normal which organisation need to learn how to work around. **MC** stated that the risk he foresees is compounded by 2 things which are specific to how consultations are conducted.
- 2.60.1. The streamlined approach with expert advisory groups is good because it has less demands on fewer people. The counter risk is having a more well-rounded understanding of what is being consulted on which is compounded in the more opaque consultation phase of solution design/option which enables things like complexity, time, etc. to feed in.
- 2.60.2. Therefore, the risk is that if these solutions in consultation are not properly understood, and if this materialises, there needs to be a way to mitigate this.
- 2.61. **SW** stated that from an RBS point of view, the idea is that schools returning will mark the commencement of a transition back to normal practices. **SW** stated that this will be Q4.
- 2.62. **IG** stated that one of the things that needs to come out is just because the CIP and the Roadmap comes to its conclusion does not mean the crisis is gone, it still exists and needs to be addressed.
- 2.63. **RR** explained that this is a helpful reflection. **RR** stated that he agrees with RBS, but schools may not all go back. **RR** stated that there are a lot of dependencies on what is going on in India which is a major constraint. **RR** explained that therefore the LBG submission was that the crisis period is not ready to conclude.
- 2.64. **PM** had a question about process and timing as he was not sure if these were addressed in **IG**'s opening remarks; **PM** was not sure if **IG** was intending to decide this morning and whether representations were taken from non-

CMA9 representatives. **PM** added that UKF hosts its Open Finance Working Group on Friday 26 June 2020. **PM** was hoping to take wider sounding and play back on Friday, 26 June 2020.

- 2.65. **IG** stated that the OBIE is open to representations for the duration of this week and is flexible as to how this could be provided. **IG** explained that himself and **BR** would meet early next week (w.c 29 June 2020) and will conclude at the end of the month. **IG** was interested in what the non-CMA9 have to say even though there is nothing in the Roadmap that is mandated to them.
- 2.66. **AA** referred to comments – the question from **MC** and **RR** is around the constraints they are under (situation in India and return to school in September) – **AA** stated that the question is not whether the firm is back to normal but whether at this point the organisation has the capacity to contribute to consultations effectively. **AA** added that the consultations coming up are relatively light touch – CEF and MI and bilateral conversations.
- 2.67. **AA** was hoping that there will be capacity to do these sorts of things, recognising that consultations on things like VRP and sweeping will be heavier. In terms of **MC**'s point - *are we sacrificing the quality of consultations by doing this streamlined approach?* **AA** stated that the OBIE are cognizant of that risk and the hope is that it ensures quality and that things are not found out after the event. **AA** stated that while the EAG's will be in effect, there will still be the wider forum. **AA** stated that there will be opportunities to get into things in more depths and materials published for review. In terms of the biggest meatier conversations and consultations around sweeping and VRP, **AA** explained that the OBIE is looking at doing this differently – a far wider consultation, very similar to the Roadmap consultations which went out more broadly, with open meetings and consultation questions were sent out according to an iterative process.
- 2.68. **IG** expressed the importance of getting the terminology right in the written document to ensure the basics are right. **IG** stated that in addition to what **AA** has said, it is important to have a QA step for OBIE to ensure that what goes out is not ambiguous and does not allow for different interpretations.
- 2.69. **MC** stated that it is about recognising the risk that the approach set out specifically over the next few months has an increased risk of not understanding the documentation or misunderstanding each other in the firms connections through the industry, but also across the firm's own teams because of remote working. **MC** stated that something needs to be designed that mitigates the risk. **MC** agreed that QA for the OBIE is good, but there needs to be something else for the mandated set of organisations so that the decisions are fully understood.
- 2.70. **IG** explained that this has been very helpful and what the OBIE's recommendation is seeking to do is not to determine when the crisis is over, but when there is enough capacity within the CMA9 to begin to absorb the requirements of the Roadmap. **IG** stated that the determination is that the consultations should carry on with the new modus operandi that has just been discussed, nonetheless, most banks should be able to absorb the crisis. **IG** added that where individual banks are not able to, they can apply for deferrals. To **MC**'s point, **IG** stated that the OBIE has laid out their recommendations quite clearly in the memo that has been received, **IG** strongly encouraged IESG members to get in touch and respond to that memo, adding that it does not have to be at this forum.
- 2.71. **IG** opened the floor to other comments. There were none. **IG** concluded - **BR/IG** will assess the recommendation next week (w.c 29 June 2020 and before the end of the month). **IG** stated that the commitment to IESG members is to continue to monitor what is happening with the crisis. **IG** stated that there is even betting that there will be renewed lockdowns, further waves, etc. and of course the OBIE will need to react to that but that is being kept separate from discussions on CIP.

3.a AOB – 90 DAY RE-AUTHORISATION

- 3.1 **IG** handed over to **GL** to brief the group and take input.
- 3.2 Following a publication of a paper which FDATA prepared (led by **GB**), **GL** stated that FDATA has been circulating written evidence of the impact of 90-day re-authentication to regulatory authorities. **GL** stated that it has become reasonably clear that a number of firms are entering survival mode, including the contemplation of returning

capital to shareholders and the potential of winding down or ceasing all marketing and new acquisitions until it is fixed. **GL** stated that FDATA took a view that there was no traction in the European arena on this topic having tried for a long time to bring forward the evidence. **GL** stated that FDATA decided that it was time to call on a cohort of market participants to come together for a discussion on what might need to be done; this has resulted in the 'All Hands' series of meetings.

- 3.3 **GL** explained that there have been two meetings so far, the first being evidence presentation and discussion. **GL** stated that this involved firms from the ASPSP and TPP community, as well as senior leadership from OBIE, FCA, CMA, HMT and other associations. From a CMA9 point of view, **GL** stated that there was representation from 3 organisations and a handful of TPPs from a variation of business points who all described different types of impacts.
- 3.4 **GL** explained that it was not just impact on firms who have products in the market, but those who chose not to bring products to the market – particularly looking at things like maintaining assessments of credit worthiness and firms who had decided not to implement new innovations that related to alerts to customers because of the risk of being timed out. For those firms who have had products in the market, **GL** stated that they are suffering because those products are no longer to be trusted.
- 3.5 **GL** stated that FDATA had evidence from the accounting platforms, stating that Intuit and Zero gave evidence of the security impact of firms sharing log-in data with their accountants as well as trouble in accessing account information and keeping it up to date. **GL** stated that there was also evidence from Investments and PFM apps, including other apps who brought forward their ideas.
- 3.6 In terms of the process, **GL** stated that the best performing ASPSPs were still resulting in typically 30% attrition right down to 60-70% attrition and most of these firms were mature with over hundred thousand customers in the market; it was reasonably clear that this was not a case of banks vs. Fintechs, but more to do with needs in the market.
- 3.7 **GL** stated that the second meeting was about proposing solutions, stating that the EMA, FDATA and UK Finance were present, including the consumer and SME representations, OBIE and FCA. **GL** explained that a number of options from different angles and the regulatory authorities have taken this away to look at some risk mitigation factors to help the preferred option.
- 3.8 **GL** paused for reflection.
- 3.9 **IG** stated that given that this was a good cross-section of the ecosystem, it would be good to talk about the options and encouraged IESG members to raise any opinions or points of view.
- 3.10 **GL** went on to explain that the options explored were regulatory and technical, looking extensively at-risk factors – risk to the customer, security risks, risks of the customer being exposed to long term connections to TPPs where there was no longer any value exchanged. **GL** stated that political and regulatory risks were discussed, including potential impacts of passporting rights in the EU.
- 3.11 **GL** stated that it became clear that the banks and the CMA9 have implemented all that has been asked of them, adding that the CEG guidelines have been delivered and TPPs have input into that. **GL** stated that the problem is that regulations do not work because they do not consider human behaviours and all discussions looked at in terms of managing the risk did not take away from the fact that there is a flaw in the law.
- 3.12 **GL** stated that considering this, the two points explored are:
 - 2.71.1. A change to the law during the January Brexit exit.
 - 2.71.2. A temporary forbearance.
- 3.13 **GL** stated that the group wanted to look at a solution that was easy to implement, very light and low cost to both parties and the option that was most favourable was to reach into the law and remove the offending article – article 10. **GL** stated that this would remove the need for 90-day re-authentication which would enable the PSU to

enter into a contract with their TPP to set the term of the engagement and for that to be appropriate to the business model of the TPP.

- 3.14 **GL** stated that at the same time, there are plans to make a change to compel the TPP to communicate with the PSU at least once every 90 days to ensure the PSU is aware that they are still connected and to guard against long term access with no value exchange.
- 3.15 **GL** stated that there were options beyond 1 or 2 which looked at whether the re-authentication job is transferred to the TPP using a delegated authority. From a competition perspective, **GL** stated that it was decided that enabling an obstacle to be removed only via bilateral contracts was not the way forward. **GL** explained that this led to the group looking at an OBIE led scheme which had some stronger merit but did not take away from the fact that the problem is not solved by delegating authority as there is still a requirement for 90-day re-authentication.
- 3.16 **GL** explained that the group looked at methods that had the ASPSP playing a role in trying to encourage the re-authentication which has some competition and legal ramifications.
- 3.17 **GL** stated that other business models were investigated, including the option of doing nothing.
- 3.18 **GL** stated that the conclusion was that the proposed solution would have to be something that does not require a lot of cost and the FCA, CMA, HMT and OBIE have taken an action to discuss this further.
- 3.19 **IG** thanked **GL**, stating that that it was obvious that this is an important topic for FDATA and the Fintechs; the first *All Hands* talked about the problems and the second was about the solutions. **IG** stated from an OBIE point of view that implementation is as per the existing regulations as they stand, adding that **GL** is pushing this forward in the interest of the community. **IG** stated that FDATA is approaching this in a consensual way to see if there are any solutions that work best for all participants. **IG** encouraged IESG members to engage with **GL** directly for this. **IG** informed IESG members that **GL** is planning another All Hands' which could be an opportunity for others to participate.
- 3.20 **GL** stated that FDATA is leaving the regulatory authorities to work on what solutions they think they can bring forward. On the industry side, **GL** stated that they will continue to look at things that could improve the execution of the various options – e.g. how to communicate to the customer every 90 days to ensure that they are aware of the connection and method of opting out, improvements to the consent dashboard so that they are aware that they are still connected on the ASPSP and TPP and a variety of other things that will provide some comfort to the regulatory authorities that the balance of consumer risk is being adequately managed.
- 3.21 **IG** opened the floor to comments, stating that people who want to reach out directly and offline should feel free to do so.
- 3.22 **FR** thanked **GL** for engaging with the consumer representatives stating that helpful conversations have been held. By way of a further update, **FR** stated that she held a consumer forum on 90-day re-authentication with consumer groups in which she presented some of **GL**'s data from money dashboard (on an anonymised basis). **FR** highlighted that the key policy topic of interest is inertia which is being worked on by organisations such as Citizens Advice. **FR** stated that this brought to light some of the confusion around the purpose of 90-day re-authorisation – is the purpose security or protection from inertia? **FR** explained that there is a realisation that 90-day re-authentication is not a great tool as some think it is very blunt and disengaging. **FR** added, however, that consumer representatives believe the concept of regular engagement is helpful and they would like to have something like 90 day-reauthorisation but better.
- 3.23 **FR** concluded by stating that there will be a further meeting (as the last session was only an hour with not a lot of depth), but made IESG members aware that there is a level of understanding about the balance of interest and how challenging the 90 day re-authorisation really is.

- 3.24 **GL** stated that if any of the CMA9 or other ASPSPs want to look at the analysis, **GB** intends to share this with UKF to disseminate that to the parties. **GL** added that it is an opportunity for anyone to feed in, stating that the regulatory authorities may choose to introduce a wider consultation to facilitate a wider input.
- 3.25 **HOZ** wanted to offer a couple of thoughts. **HOZ** stated that she attended the workshops organised by **GL** and agreed that there was compelling evidence in terms of the issue around 90-day re-authorisation. **HOZ** stated that she also attended the workshop organised by **FR** with consumers which was helpful for understanding the need for balance when it comes to inert customers. **HOZ** referred to the comment alluded to by **GL** – the FCA will consider possible changes to the RTS which is the main legal document where the 90-day re-authorisation requirement comes from. **HOZ** flagged two things:
- 2.71.3. There is no immediate silver bullet when it comes to time frames. Alex mentioned that the earliest timeframe is 6 months which would be incredibly accelerated.
- 2.71.4. **HOZ** stated that there is a greater question – what is the objective? There is a point whereby if a customer does not wish for their data to be shared, it can be stopped naturally. A change to this will take time.
- 3.26 **CA** wanted to see the analysis and evidence presented. By way of a suggestion, **CA** stated that in looking at the 90 day re-authorisation, there are a lot of people not using the shorter and slicker re-authorisation and while this does not answer the question, in terms of looking at shorter term solutions, it might be worth looking into.
- 3.27 **TS** referred to the suggestion at the last IESG - the RTS talks about authorisation being made to the provider but does not clarify if this is the AISP or the TPP. **TS** stated that if a regulator wanted to exercise discretion, they could allow for the authentication to be done to the TPP who could put in something that meets both objectives – the RTS and enabling consumers to express whether or not they want to continue with the service. **TS** thought that this was worth exploring as it is a good way forward even though it has not yet been fully tested.
- 3.28 **IG** was happy with this point stating that **JC** had raised at the *All Hands* meeting and was sure **HOZ** would want to come back on this, adding that this should not be a re-run of the All Hands meeting. **IG** stated that he would take a point from **MC** and **HOZ**, however explained that these would be the last points on this topic. **IG** added that the invitation to join the next *All Hands* is open.
- 3.29 **MC** understood the challenge, stating that the work to do some analysis is highly valued but there is a risk that these are solutions that outside of any formal consultation process with no full understanding of those solutions. **MC** raised alarm bells with regards to the huge amounts of money on architecting the infrastructure that is based around the consent model that exists today and assumptions around what is seemingly a simple change need to be thought through.
- 3.30 **HOZ** stated that the RCA interpretation about article 10 has been clear and certainly not an option that the FCA would encourage.

CONCLUSION

- 3.31 **IG** thanked IESG members for attending this meeting.
- 3.32 **IG** stated that David Beardmore would be invited to give a comprehensive overview on the ecosystem at the next IESG on 30 July 2020.
- 3.33 **IG** stated that within this meeting, the standards were approved, IESG members took strides forward with the working groups and there were healthy discussion on CIP; **IG** asked for further representations on this item by the end of the week.
- 3.34 **IG** closed the meeting.