

Meeting Minutes

| Meeting Details | |
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| Meeting Date: 14 Feb 2017 | Meeting Name: Open Banking Implementation Entity Steering Group |
| Meeting Time: 10:00 – 12.00 | Meeting Location: UK Payments building, 2 Thomas More Square, London – Auditorium (Second floor) |

| Attendee | Role | Attendance |
|--|---|-----------------|
| Members – Implementation Entity (IE) and CMA9 | | |
| Andrew Pinder (AP) | IE Trustee (Chair) | Yes (In person) |
| Kevin Henwood (KH) | IE Programme Director | Yes (In person) |
| Andy Booth (AB) | Barclays Bank | Apologies |
| Catherine McGrath (CM) | Barclays Bank – Delegate | Yes (In person) |
| Andy McComb (AM) | Danske Bank | Yes (In person) |
| Andrew Slough (AS) | HSBC | Yes (In person) |
| Daniel Ehreich (DE) | Bank of Ireland | Yes (In person) |
| Paul Horlock (PH) | Nationwide | Yes (Telephone) |
| Robert White (RW) | Santander Bank | Yes (In person) |
| Roy Hutton (RH) | Allied Irish Banks | Yes (In person) |
| Richard Rous (RR) | Lloyds Banking Group | Yes (In person) |
| Kevin Hanley (KH) | Royal Bank of Scotland | Yes (In person) |
| Alex Hone (AH) | IE Secretariat | Yes (In person) |
| Members – Stakeholder Groups | | |
| Jeremy Fraser (JF) | Challenger Banks | Apologies |
| Gavin Littlejohn (GL) | Fintech | Yes (In person) |
| James Whittle (JW) | PSD2 | Yes (Telephone) |
| Thaer Sabri (TS) | Payment Service Providers | Yes (In person) |
| Ian Major (IM) | Third Party Providers | Yes (In person) |
| Customer Representatives | | |
| Faith Reynolds (FR) | Consumer | Yes (Telephone) |
| Mark Chidley (MC) | Small Business | Yes (In person) |
| Observers | | |
| Andrew Laidlaw (AL) | FCA | Yes (In person) |
| Daniel Turnbull (DT) | HMT | Yes (In person) |
| Edward Corcoran (EC) | HMT | Yes (In person) |
| Phillip Mind (PM) | IE Advisor | Yes (In person) |
| Dora Guzeleva (DG) | Payment Systems Regulator | Yes (In person) |
| Walter McCahon (WM) | British Bankers' Association | Yes (In person) |
| Guests | | |
| Arron Latham (ALa) | IE Strategy BA | Yes (Telephone) |
| Gary Farrow (GF) | IE Chief Architect | Yes (In person) |
| Bill McCluggage (BM) | IE Information Security Workstream Lead | Yes (In person) |

| # | Agenda | Purpose |
|---|---------------------------------|-------------|
| 1 | Programme Update | Information |
| 2 | PSD2 Additional Scope | Awareness |
| 3 | Customer Trust Solution Concept | Decision |
| 4 | Go-Live Process | Awareness |
| 5 | Programme Issues & Risks | Review |
| 6 | Open Actions | Review |
| 7 | AoB | |

Agenda item 1 – Programme Update

AP opened the meeting and welcomed the members, it was noted that any final amendments to the previous minutes should be raised and once updated; the revised minutes will be recirculated.

KH provided an update on the programme status:

- The overall status for the programme was reported as Amber for Open Data and Read / Write, with 6 of 9 CMA9 reporting Green but with an overall status of Amber for the Open Data delivery. The final baseline data dictionary API set v1.2.4. has been released as the reference point for End to End Testing. Third Party Providers have now been identified and are participating in testing. Go-Live for the 3rd of March including Commercial Credits Cards, which was previously scheduled for 31st March is in scope also and on track.
- Read/Write is progressing and moving forward to a final design of the overall architecture, alignment to PSD2 and assessment of additional scope items underway. A set of Agile Design Workshops have been scheduled to improve collaboration with industry and also to expedite requirements to enable an earlier release of the Beta API set at the end of April 2017.
- PH noted that there needs to be an emphasis on capturing requirements and using the expertise of the group to document the intended outcome through the design process and assessment of do-ability. CM stated there needs to be a short term focus on the alignment of Open Banking and PSD2 to understand where the CMA remedies and PSD2 requirements merge.
- **ACTION_SG016:** Steering Group Forward Agenda to be produced, outlining future topics of discussion and decisions required.

Agenda item 2 – Go-Live Process

To follow on from the Programme update, this agenda item was brought forward; KH presented the Go-Live Process and key points are noted below:

- A high level view of the approach, including example testing documentation and readiness document. Two extraordinary IESG meetings are required to support the Go-Live decision process. Details of the full approach will be shared with the CMA9 Programme Management Group (PMG) and guidance will be provided to complete the Go-Live Readiness Statement.
- A query was raised regarding the CMA9 being required by Nesta to sign-off the quality of the institutions data, AP stated the Go-Live process and Nesta is not directly linked. GL asked how the programme will assess the Go-Live is in the spirit of the CMA remedies and ready for future releases and wider adoption by industry. AP stated that input has been sought from the Stakeholder Groups in the decision making process to produce v1.2.4 of the data and API set, also a schedule and roadmap of future releases is being defined and agreed with the CMA9 and participate up take will be considered as part of defining the timeline.
- AL stated that the extent of which the data is being released is one of the main outcomes for the customers. Performance measurements and indicators are required to be able to map back to intended customer experience and assess performance. Third Party Providers accessibility is also an evaluation criteria that will provide an indication of performance. MC mentioned that competition will occur and improve as the adoption of the technology increases.
- A request was raised to capture a Deficiencies List to capture any requirements which will be included in the post Go-Live data release. **ACTION_SG017:** A list of Change Requests and concerns that have been flagged across the relevant workstreams, with a particular focus on release 1.2.4. IM no formal issues had been raised by the Third Party Providers as part of testing to date, however there is a potential risk of misunderstanding the data fields. 4 of the 6 data sets including credit line and credit brokerage, which may have consent and regulatory restrictions.
- It was noted that this group will make the recommendation to the Implementation Trustee and if required an element of judgement will be employed.

Agenda item 3 – PSD2 Additional Scope

GF provided an update on the Read/Write Architecture and key points are noted below:

- An overview of the proposed scope extension to the CMA Order was presented as a comparison of what is in scope of Open Banking and what is deemed as additional scope elements related to PSD2. It was noted that further discussions are required to perform analysis to finalise the scope and gain agreement on which elements are in and out of scope.
- JW confirmed the PSD2 Stakeholder Group will contribute to the architectural work being led by the IE but suggested a two-step approach to defining the scope, (a) a restrictive PSD2 scope which is aligned with Open Banking and (b) a timeline and approach for defining the revised scope to be brought back to IESG for ratification. **ACTION_SG018:** Schedule and approach to produce Open Banking / PSD2 scope, statement high level requirements and FCA/HMT regulatory timetable. AP queried where the work will be completed as the creation of the assumptions requires considered management. EC stated that it is the clear intent of HMT for full alignment of Open Banking and PSD2 to occur. IM noted clarity is required between the CMA Order and PSD2 Directive in relation to the payments vs. transactions and the requirement for transactions to be double checked.
- **DECISION_D003:** The following points were noted (a) GF to lead the PSD2 architectural work with input from the PSD2 stakeholder constituents (b) seed funding for Open Banking resource to support with the scope and requirements analysis.

Agenda item 4 – Customer Trust Solution Concept

BM presented the design concept for the Customer Trust Solution Concept and key points are noted below:

- A licensing and accreditation process that compliments the FCA authorisation process was presented to the group. This process also supports the participant registration process. The Triangle of Trust which illustrates the relationship between OBS, AISP/PISP and ASPSPs, FR raised a query related to how will the Open Banking Service (OBS) govern data sharing between TPP to TPP, this will be trust elements and tracking of secure connections. The OBS will issue security certificates, which is defined as the relationship between the ASP and TPP. The OBS will also perform a regular review of the workflow between the FCA, Public Registry and the Operational Governance Body.
- A set of 4 recommendations were put forward to support the development of the OBS Trust Framework.
- GL mentioned that although supportive of the recommendation, no Stakeholder Group representation had been included in the design work to produce this concept, also that the Liability Model need to be considered as part of the design process and lastly the overall strategy for certain element remained unclear. FR stated a “laundry list” of items is required to the Forward Agenda and future topics of discussion. AP requested GL to consider ways of working to manage the Liability Model discussion, PSD2 alignment and Stakeholder Group interactions. **ACTION_SG019:** Produce a list of items that need to be considered for Read / Write and PSD2 implementation and a proposal of how to generate recommendations to IESG.
- **DECISION_D004:** Approved four areas of recommendation, (a) Open Banking continues development of the Trust Framework, (b) OB Operational Governance Body is responsible for live operations, (c) the Trust Framework supports and enables PSD2 compliance including Strong Customer Authentication (SCA) and (d) the Trust Framework creates a platform for future iterations of the solution.

Agenda item 5 – Programme Issues & Risks

Due to limited time, the issues and risks were noted but not reviewed in detail.

Agenda item 6 – Open Actions

All of the previous actions were referenced as part of the meeting.

Agenda item 7 – Any of Business (AoB)

There were no items of AoB recorded at this meeting.

New Actions from Implementation Entity Steering Group (18 Jan 2017)

| Ref | Date Raised | Action Description | Owner | Target Resolution Date | Commentary | Status |
|--------|-------------|---|------------------|------------------------|---|--------|
| SG_016 | 14 Feb 17 | Forward Agenda Steering Group Forward Agenda to be produced, outlining future topics of discussion and decisions required. | Alex Hone | 24 Feb 17 | 15/03: Carry forward subject to compounding scope and any governance revisions. | Open |
| SG_017 | 14 Feb 17 | "Deficiencies List" A list of Change Requests and concerns that have been flagged across the relevant workstreams, with a particular focus on release 1.2.4. | Alex Hone | 24 Feb 17 | 15/03: List of change requests and deficiencies circulated by the Standards w/s 11 Mar. Engagement with CMA9 via Standards Working Group to agree next release date and maintenance schedule. | Closed |
| SG_018 | 14 Feb 17 | PSD2 High Level Timetable Schedule and approach to produce Open Banking / PSD2 scope, statement high level requirements and FCA/HMT regulatory timetable. | Gary Farrow | 03 Mar 17 | 15/03: Update provided in this pack. | Closed |
| SG_019 | 14 Feb 17 | Implementation Items Produce a list of items that need to be considered for Read / Write and PSD2 implementation and a proposal of how to generate recommendations to IESG. | Gavin Littlejohn | 21 Mar 17 | 15/03: Letter and proposal sent to Implementation Trustee. | Closed |