

# Meeting Minutes

Meeting Details	
<b>Meeting Date:</b> 18 Apr 2017	<b>Meeting Name:</b> Open Banking Implementation Entity Steering Group
<b>Meeting Time:</b> 10:00 – 12.00	<b>Meeting Location:</b> UK Payments building, 2 Thomas More Square, London – Board Room (Second floor)

Attendee	Role	Attendance
<b>Members – Implementation Entity (IE) and CMA9</b>		
Imran Gulamhuseinwala (IG)	IE Trustee (Observer)	Yes (In person)
Keith Ford (KF)	IE CEO (Chair)	Yes (In person)
Roy Hutton (RH)	Allied Irish Banks	Yes (In person)
Daniel Ehreich (DE)	Bank of Ireland	Apologies
Andy Booth (AB)	Barclays Bank	Yes (In person)
Liam Curran (LC)	Danske Bank	Yes (In person)
Andrew Slough (AS)	HSBC	Yes (Telephone)
Steve Smith (SS)	Lloyds Banking Group	Yes (In person)
Paul Horlock (PH)	Nationwide	Yes (Telephone)
Robert White (RW)	Santander Bank	Apologies
Nuala Jackson (NJ)	Santander Bank	Yes (In person)
Dan Globerson (DG)	Royal Bank of Scotland	Yes (In person)
Alex Hone (AH)	IE Secretariat	Yes (In person)
<b>Members – Stakeholder Groups</b>		
Vacancy	Challenger Banks	N/A
Gavin Littlejohn (GL)	Fintech	Yes (In person)
James Whittle (JW)	PSD2	Yes (In person)
Thaer Sabri (TS)	Payment Service Providers	Yes (In person)
Ian Major (IM)	Third Party Providers	Yes (In person)
<b>Customer Representatives</b>		
Faith Reynolds (FR)	Consumer	Yes (In person)
Mark Chidley (MC)	Small Business	Yes (In person)
<b>Observers</b>		
Walter Mccahon (WM)	British Bankers' Association	Apologies
Andrew Laidlaw (AL)	FCA	Yes (In person)
Daniel Turnbull (DT)	HMT	Yes (In person)
Phillip Mind (PM)	IE Advisor	Yes (In person)
Dora Guzeleva (DG)	Payment Systems Regulator	Yes (In person)
<b>Guests</b>		
Bill Roberts (BR)	Conduct Markets Authority (CMA)	Yes (In person)
Gary Farrow (GF)	IE Chief Architect	Yes (In person)
Richard Lindsay (RL)	IE Stakeholder Communications	Yes (In person)
Chris Michael (CM)	IE Technical Delivery	Yes (In person)

#	Agenda	Purpose
1	Programme update	For information
2	Open Data and Account Information APIs	For review
3	eIDAS Interoperability	For review
4	IESG Offsite Proposal	For review
5	Programme Issues & Risks	For review
6	Actions	For review
7	AoB	N/A

## Agenda item 1 – Programme Overview

KF opened the meeting and welcomed the group and introduced Imran Gulamhuseinwala as the new Implementation Trustee. BR noted that he attended the Mar IESG due to the circumstances of the previous Trustee having to step down. BR also provided thanks to those that had supported with the Implementation Trustee recruitment process.

A number of minor amendments were noted related to the 20 Mar IESG and the Exceptional IESG on the 23 Mar.

KF provided the programme update and stated the programme is currently Amber as agreed at the PMG meeting on 11 Apr, although the pack reported a status of Green. This is primarily due to a number of the API development milestones being delayed but without significant risk to the overall API delivery. The Programme Approach Document (PAD) has been reviewed in detail with the CMA9 and following feedback, certain sections are being re-drafted based on the principles of scope and delivery rather than the specific detail e.g. programme scope, governance and PSD2 alignment. PH noted this whilst this is a very useful document, it requires additional detail and consensus on approach to be able to provide a plan of record. **ACTION\_A030:** RL to distribute a working draft of the PAD to IESG for review and feedback via their PMG members.

PCA and BCA Front-book vs. Back-book analysis has been performed to understand potential impact on comparison for Open Data and Account Information APIs; currently 85% of UK personal accounts are held on Front-book products. Further analysis will be performed as part of the Runpath data integrity review.

It was stated a Liability Workshop has been scheduled for May 10 to frame the Liability Model and provide recommendations on an approach for analysis of liability, based on known causes, and an approach for analysis and recommendation for resolution, which will be presented for IESG approval. SS stated the customer journey and experience should be the starting point for defining the liability based on payments use cases. TS noted that PSP liability and the support framework requires specific analysis. GL noted that every possible payments journey should be captured, documented and analysed. **ACTION\_A031:** Re-schedule the Liability Workshop to allow additional IESG members/presenters to attend.

It was noted the ICO should be represented at the IESG and it was agreed discussions are required on how to how best facilitate this. **ACTION\_A032:** ICO representation at IESG.

KF provided an update on the PSD2 additional scope elements analysis. AB and TS both queried which elements would be in scope. **ACTION\_A033:** GF to circulate a table which sets out the PSD2 additional scope elements and the rationale for inclusion/exclusion. JW stated this is crucial for negotiating the approval of any additional scope. GF explained the approach taken for the analysis is based on providing long term functionality vs. the do-ability in time for the 13 Jan Read/Write delivery. GL requested this to be set out in a Word document, outlining the analysis approach, risks, issues and assumptions and the intended output, including an executive summary, to provide context. AB stated the scope debate needs to happen at a higher level of governance than PMG and KF noted governance and decision making will be covered at the IESG Offsite. GL requested sight of the PMG pack and it was confirmed the PMG is circulated to IESG members. GL also stated that scope issues have not been recorded and presented to this group for review and comment.

## Agenda item 2 – Open Data and Account Information APIs

CM provided an overview of the Open Data and Account Information API and the following points were noted.

- The Open Data v1.3 went live in Mar 2017 and the current update to Open Data v2.0 is planned for end Jul 2017. This will be a significant re-write to make on-boarding new products easier and to ensure ISO20022 compliance. The Account Information API is due to be published on the 02 May and this will be aligned to the v2.0 of Open Data that the CMA9 are expecting to go-live in Jan 2018. The purpose of this Account Information API is to enable PSU (via AISP) to access additional PSD2 requirements such as online and product information.
- The main issue with this approach is that it does not cater for Back-book and bespoke or negotiated products due to the complexity of the development required for defining all scenarios and pricing models.
- CM explained the three options to the group, including the rationale for each recommendation.
  - a. Publish a simplified API in May which is based on v1.3, which will provide a refreshed API that can be implemented by the CMA9 in Jan 2018.
  - b. Delay the release of Account API until Aug 2017, with product data based on Open Data model 2.0, which will provide a fully working API which will in reality meet the CMA use case (Account API will match Open Data API, both on v2.0).
  - c. Release a more basic Account API as planned on 02 May, but without product data components. Then issue a second release in Aug 2017, adding the product data based on Open Data model v2.0. We will deliver a working API on time, albeit with reduced functionality, which should enable the CMA9 to go live as planned in Jan 2018. All CMA9 customers on current products (and possibly many on Back-book products, if these are also included in Open Data API) will be able to make use of this service from Jan 2018. One Open Data standards release as opposed to two releases. This is the preferred option and recommendation to IESG.
- RH queried that if the simplified API is a significant re-work, should we be holding back new institutions from being on-boarded until this is all resolved. KF stated we are looking at communications for the release and maintenance schedule to ensure compliance and also quality of service. PH stated that we need to be careful what the APIs deliver vs. what propositions the institutions develop and what to provide on the API platform. IM stated that some TPPs may be building on v1.3 of the Open Data standard and that a communication is required to provide guidance on the structure and data sets and suggested any new adoption should be based on v2.0. RH suggested that TPP should use the API v1.3 and provide feedback to improve the generic and simplified structure for v2.0.
- FR queried if TPPs could innovate based on the data; IM responded that TPPs would ideally seek to build based on behaviour, layered over by data to ensure consistency. An example of this is events with cost implications but which have no value. GL mentioned that this would also create a level of liability based on product, pricing and account data.
- The Back-book for PCA/BCA will require segmentation and a force migration if we were only to use the proposed Option C. BR stated that the CMA makes no distinction between Front-book, Back-book and negotiated products. If a dispensation was to be presented this needs to be based on customer journeys that were not intended by the CMA Order.
- FR stated that Option C requires firm delivery dates and clear customer communications to drive customer awareness and based on the CMA9 strategy for moving customers to a Front-book product.

### **Agenda item 3 – eIDAS Interoperability**

GF provided an update on the eIDAS and an overview of the target solution. The following points were noted:

- The intention is that the eIDAS Certificates are used in the Open Banking Solution to prove the identity of a TPP (Third Party Provider); this will allow proof of the authorisation by the FCA or an NCA (National Competent Authority) and also provide proof of their PSD2 role. Then, once presented with an eIDAS certificate from a TPP, Open Banking will complete the registration of the TPP, issue corresponding OB Digital Identity and also issue any other necessary Digital Certificates in order to transact in the eco-system.
- From a PSD2 perspective, once a service provider is authorised by an NCA, an eIDAS Certificate will be issued representing their Digital Identity. The certificate must contain specific data according to the SCA RTS, including an identifier, contact details and role qualifier (AISP, PISP and ASPSP).
- The working assumption is that no approved UK or EU eIDAS CA will be in place for 13 Jan 2018, which needs to be acknowledged by the group and the associated issues that it brings (e.g. no certificate authority has been commissioned to issue eIDAS containing an FCA PSD2 role and that the certificate structure as specified in the SCA RTS is not at a level to ensure frictionless interoperability).

### **Agenda item 4 – IESG Offsite Proposal**

RL provided a brief update on the IESG Offsite and proposed approach and the following points were noted.

- The Offsite will be held on the 03 May, papers are currently being collated and will be circulated in advance of the meeting; it was stated this material will need to be pre-read before the meeting.

### **Agenda item 5 – Programme Issues and Risks**

AH talked the group through the programme risks and the following points were noted.

- There are currently no programme level issues which require IESG review or ratification.
- Open ID Connect – this is noted as closed on the basis that the CMA9 and IAM vendors have agreed a collective way forward to creating a common security infrastructure.

### **Agenda item 6 – Actions**

Due to limited time in the meeting, the open actions were reviewed before the programme issues and risks and the following points were noted.

- Forward Agenda – it was noted this would be agreed following the IESG Offsite, once the governance principles and purpose of IESG were agreed.
- Data Integrity – KF provided an update on the data modeling tool and the comparison report which was published to all institutions on the 28 Mar for review. A follow-up meeting has been scheduled for 04 May with Runpath to discuss if the review will be based on v1.3 or the updated v2.0.  
**ACTION\_SG34:** KF to circulate the Runpath Open Data review quote to IESG members.

### **Agenda item 7 – Any Other Business (AOB)**

JW requested to understand more about the re-usability of the API development for PSD2 and if this could be covered at the IESG Offsite on the 03 May, so that an update on scope and direction can be provided to the PSD2 Stakeholder Group.

## New Actions from Implementation Entity Steering Group (18 Apr 2017)

Ref	Date Raised	Action Description	Owner	Target Resolution Date	Commentary	Status
SG_A030	18 Apr 17	<b>Programme Approach Document</b> RL to distribute a working draft of the PAD to IESG for review and feedback via their PMG members.	RL	21 Apr 17	10/05: PAD distributed for review and feedback.	Closed
SG_A031	18 Apr 17	<b>Liability Workshop</b> Re-schedule the Liability Workshop to allow additional IESG members/presenters to attend.	PD	21 Apr 17	10/05: Workshop re-scheduled to Mon 08 May.	Closed
SG_A032	18 Apr 17	<b>ICO representation at IESG</b> Engage with ICO to secure representation.	KF	20 Jun 17	10/05: Not due.	Open
SG_A033	18 Apr 17	<b>PSD2 Additional Scope Elements</b> GF to circulate a table which sets out the PSD2 additional scope elements and the rationale for inclusion/exclusion.	GF	05 May 17	10/05: Document circulated to IESG 03 May.	Closed
SG_A034	18 Apr 17	<b>Runpath Open Data Review</b> KF to circulate the Runpath Open Data review quote to IESG members.	KF	04 May 17	10/05: Quote circulated to IESG.	Closed

### New Decisions from Implementation Entity Steering Group (18 Apr 2017)

Ref	Decision Date	Key Decision Summary	Decision Rationale	Consensus
N/A	18 Apr 17	No decisions agreed at this meeting.	N/A	N/A