Meeting Minutes

Meeting Details	
Meeting Date: 18 Jan 2017	**Meeting Name:** Open Banking Implementation Entity Steering Group
Meeting Time: 14:30 – 16.30	**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	Yes (In person)
Andy McComb (AM)	Danske Bank	Apologies
Andrew Slough (AS)	HSBC	Yes (In person)
Daniel Ehreich (DE)	Bank of Ireland	Yes (In person)
Paul Horlock (PH)	Nationwide	Yes (In person)
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	Challenger Banks	Yes (In person)
Gavin Littlejohn (GL)	Fintech	Yes (In person)
James Whittle (JW)	PSD2	Yes (In person)
Thaer Sabri (TS)	Payment Service Providers	Apologies
Judith Crawford	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)
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		
Gary Farrow	IE Chief Architect	Yes (In person)
Miles Cheetham	IE Customer Workstream Lead	Yes (In person)
Nigel Spencer	IE Operational Governance Workstream Lead	Yes (In person)

	Agenda
1	Programme update
2	Read/Write Architecture
3	Operational Governance Body Proposition
4	Customer Trust Solution
5	Registration Solution Recommendation
6	Programme Issues & Risks
7	Actions
8	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 5 of 9 CMA9 reporting Green but with an overall status of Amber for the Open Data delivery. Detailed planning activities for the Read / Write Mar 2018 delivery are underway to produce a day by day plan of activity. The defect process for the Open Data API data has been invoked to support finalising the Data Dictionaries. PH queried which third parties will be involved in testing and an action was taken to work with the Stakeholder Group representative to select relevant Third Party Providers. **ACTION_SG010:** Testing Team to engage with Stakeholder Groups to select relevant Third Party Providers to input to the testing process.

- GL requested a summary of the elements of the Open Data Mar 2017 deliverables to be able to communicate to the Stakeholder Group constituents, so that there is consensus between Steering Group and the industry. **ACTION_SG011:** Summary of Open Data Mar 2017 deliverables mapped to the CMA remedies.

- An update was provided on the website and it was stated that the working IE name of "Change Banking" vs. Open Banking brand identify needs to be resolved. There is a need to have a consistent engagement across industry to build trust and confidence. The website is currently being developed and is planned to be launched at the end of January 2017. PH mentioned that the CMA9 would like to be involved and consulted in the discussions related to the website and brand name.

- An update was provided on PSD2 following initial conversations with the FCA and HMT based on the preliminary gap analysis and the potential concurrent delivery of Open Banking and PSD2 and the outcome of the gap analysis **ACTION_SG012:** PSD2 SG to complete gap analysis showing extension from CMA remedy to PSD2. The Stakeholder Group representatives mentioned the outcome of the meeting could potentially impact the scope and remit of their groups and requested the IE to reclassify Steering Group documentation so that this can be shared with their constituents. **ACTION_SG013:** Document reclassification and potential redaction process to be considered to improve the flow of documentation to the Stakeholder Groups. The update at the next Steering Group will focus on how the building blocks for a PDS2/Open Banking delivery will be reflected in the CMA Order and the alignment to the FCA requirements.

Agenda item 2 – Read/Write Architecture

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

- The Outline Solution architecture overview was presented to the group as the building blocks for the Open Banking Service supporting Third Party Providers (TPPs) and Account Servicing Payment Service Providers (ASPSP) architecture.

- AB asked the programme to be clear that it is accepting the risks of a 'no keys' open API solution, which leaves the APIs for Q1 2017 potential vulnerable to a denial of service attack. It noted this a potential serious risk and AB confirmed that the selection of this solution is not a decision the bank supports, but accepts it is mandated by the Implementation Entity.

- A central Registry of participants was articulated to the group. **ACTION_SG014:** Identify scenarios where an ASPSP can also act as TPP and identify if this impacts the validation of the Triangle of Trust model.

- The key principles for scheme independence and uniquely referenceable payments where set out as examples non-scheme and scheme specific functionality and where the development needs to be balanced with the customer outcome and to protect the interest of the customers. Next steps are to define the next level of detailed design of the APIs, data and operational infrastructure to inform the alignment with the FCA.

Agenda item 3 – Operational Governance Body Proposition

NS presented design assumptions for the Operational Governance Body Proposition for approval and key points are noted below:

- As part of the CMA remedies there is a requirement on the IE to implement a permanent body that will need to be established to govern the solution into the future. The future body is intended to govern the following core solutions Whitelist, API standards, Data standards and security standards and Governance. It was noted the UK Payments Strategy Forum have also proposed a new body that could potentially take on governance and responsibility for all APIs across the UK payments industry.

- The bounders and potential overlaps for regulations and management of standards will need to be determined as part of the design of the future body, including working with the FCA to agree the levels of access and anti-fraud requirements. This definition will be concluded as part of the consultant through working groups, key external stakeholders and regulators. The next steps are to produce the detailed design and definition and present back to Steering Group in March with a proposal for ratification and a following update in Q2 2017 which will set out the potential funding model.

- **DECISION_D001:** The Steering Group approved the design assumption that the future Open Banking Governance Body will be an Industry Service Organisation operating as a Financial Markets Infrastructure.

Agenda item 4 – Customer Trust Solution

MC presented the Customer Trust Solution and key points are noted below:

- The solution being proposed will comprise of the development of a recognisable trust solution that both provide confidence and protect the customer, supported by an awareness campaign that highlights the secure nature of the Open Banking services. The technical capability of the solution will provide industry best practice information security and counter-fraud measures that are appropriate to the Open Data threat level and followed by a highly secure technology for applications that are required for Read/Write data; whilst ensure a low friction customer experience.

- **DECISION_D002:** Approved the investigation of a Customer Trust Solution, subject to a more detailed approvals process when ready to propose.

Agenda item 5 – Registration Solution Recommendation

NS presented the Registration Solution Recommendation for approval and key points are noted below:

- The requirement for a register of TTPs has been mandated by the CMA Retail Market Investigation, to ensure the IE create an appropriate level of security around the Open Banking Service to engender trust and confidence in customer, encourage use and avoid fraud. The proposed registry functionality will be compliant with PSD2.

- The Steering Group approved the development and implementation of the Central Register for Mar 2017 Open Data, which will require all API Providers to be registered and verified for Open Data and to be bound by the Open Banking legal terms including terms and conditions. **DECISION_D004:** Steering Group approved the development and implementation of the Central Register for Mar 2017 Open Data.

- It was also recommended to create a proposal for a highly secure and highly available Registry for APIs for Read/Write access in January 2018. **ACTION_SG015:** The rational and definition of a Register vs. a Registry and the interaction with the FCA Registry requires further clarity as part of the proposal for the Read/Write.

Agenda item 6 – Programme Issues & Risks

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

Agenda item 7 – Open Actions

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

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

Ref	Date Raised	Action Description	Owner	Target Resolution Date	Commentary	Status
SG_010	18 Jan 17	Testing Team to engage with Stakeholder Groups to select relevant Third Party Providers to input to the testing process.	Alex Hone / Stakeholder Groups Representatives	23 Jan 17	**30 Jan:** List of TPPs identified to participate in end 2 end testing.	Closed
SG_011	18 Jan 18	Summary of Open Data Mar 2017 deliverables mapped to the CMA remedies,	Alex Hone	03 Feb 17	**30 Jan:** Summary of Customer use cases for Open Data circulated to IESG members.	Closed
SG_012	18 Jan 17	PSD2 SG to complete gap analysis showing extension from CMA remedy to PSD2.	James Whittle	27 Jan 17	**08 Feb:** PSD2 Gap Analysis updated and shared with Working Group.	Closed
SG_013	18 Jan 17	Document reclassification and potential redaction of classified documentation to improve the flow of documentation to the Stakeholder Groups.	Alex Hone	27 Jan 17	**30 Jan:** IESG materials redacted and circulated to Stakeholder Group representatives.	Closed
SG_014	18 Jan 17	Identify scenarios where an ASPSP can also act as TPP and confirm if this impacts the validation of the Triangle of Trust.	Gary Farrow	03 Feb 17	**08 Feb:** 1. Possible scenario – Challenger Bank providing a service to compare their products with ASPSPs 2. Question raised a Customer Working Group for more scenarios	Closed
SG_015	18 Jan 17	The rational and definition of a Register vs. a Registry and the interaction with the FCA Registry requires further clarity as part of the proposal for the Read/Write.	Gary Farrow / Nigel Spencer	03 Feb 17	**08 Feb:** Presentation given to FCA, HMT and PMG; propose to close.	Closed