

Meeting Minutes

Meeting details

Meeting date: 28/02/2019

Meeting name

Implementation Entity Steering Group (IESG)

Meeting time

10.00 – 13.00

Meeting location

Etc. Venue, 8 Fenchurch Place, London

Scribe

Julie Mitchell/Sally Chiwuzie

Classification

Public

<i>Name</i>		<i>Role</i>	
Alan Ainsworth	AA	OBIE – Head of Policy	Yes
Andrew Laidlaw	AL	FCA	Yes
Bill Roberts	BR	CMA	Apologies
Candy Ma	CMa	OBIE – Office of Trustee	Yes
Caroline Ambrose	CA	Barclays Bank	Yes
Chris Michael	CM	OBIE – Technical Delivery	Yes
Daniel Ehreich	DE	Bank of Ireland	Yes
Daniel Globerson	DG	Royal Bank of Scotland	Yes
Daniel Jenkinson	DJ	Senior Manager for Consumer/SME representatives	Yes
Ed Colley	EC	OBIE - Prog Director	Yes
Eduardo Martinez Barrios	EMB	Santander	Delegate for RW
Faith Reynolds	FR	Independent Consumer Representative	Yes
Gavin Littlejohn	GA	Fintech Representative	Yes
Hetal Papat	HP	HSBC	Yes
Ian Cox	IC	OBIE - Head of Monitoring	Yes
Ian Major	IM	TPP Representative	Phone
Imran Gulamhuseinwala	IG	OBIE – Trustee/Chair	Yes
John Hutton	JH	Nationwide	Apologies
Julie Mitchell	JM	OBIE - Secretariat	Yes

Laura Mountford	LM	HM Treasury	Phone
Mark Chidley	MCH	Independent SME Representative	Yes
Mark Mullen	MM	Atom Bank	Apologies
Matt Cox	MCX	Nationwide	Delegate for JH
Paul Horlock	DN	Pay.UK	Yes
Phillip Mind	PM	UK Finance	Yes
Richard Rous	RR	Lloyds Banking Group	Yes
Robert White	RW	Santander	Apologies
Roy Hutton	RH	Allied Irish Bank	Yes
Sally Chiwuzie	SC	OBIE IESG Secretariat	Yes
Thaer Sabri	RM	Electronic Money Association	Yes
Vicki Hassan	JG	Danske Bank	Phone
Will Curley	WC	Tesco Bank	Yes

No. Agenda item

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

- 1.1. **IG** opened the meeting and advised that there would be time in the meeting for AOB, during which **AA** would give an update on P14/P15, there would also be a short update on Nesta. **GL** advised that he would like to discuss the MasterCard intention to provide the Dispute Management System (DMS) for the UK. **PM** asked if **IG** would provide an update on the discussions that had taken place earlier in the week on the future governance of OBIE. **DG** wanted to have a discussion around the FCA and Two Way Notice of Revocation (TWNr). **IG** confirmed these would be addressed in AOB.
- 1.2. **IG** asked if there was any objection to signing off the minutes from January. **PM** asked about item 2.e, page 72, stating that the last IESG agreed to the creation of a Commercial API Working Group and that this was not recorded in the minutes.
*(Note: later in the meeting **JM** confirmed that in paper 2.h Working Group Rationalisation, submitted to the January IESG, it stated in point 2.3 Commercial API Structure. "this new working group will be tasked...", there was no formal discussion during the meeting for this to be noted in the minutes).*
APPROVAL - IESG_APR_LOG_033- Other than as discussed above, there were no contentions, and IG signed off the minutes
- 1.3. **HP** requested clarity on the mandate; he believed that there was agreement to items that came up from the EBA API Working Group to make sure the standard is fully PSD2 compliant, but nothing beyond that. **IG** advised that this was only the starting point. **HP** believed this was all that was funded, and in scope of the OBIE mandate.
- 1.4. **RR** asked about the action relating to the customer strategy. **IG** confirmed this was split across the two actions: one relating to representation on the working groups and the other through the consumer input into the articulating success piece. **RR** requested that when discussions take place on the future of Open Banking, that the customer strategy issue/consumer representation remains prominent.

- 1.5. **HP** questioned how OBIE would ensure that the future state looks at customer detriment and engagement, which are the two key drivers; it's not just about representation. **FR** added that it would be good to keep the articulating success on the IESG agenda, and requested a verbal update as to the current status at the meeting; and representation going forward still remains important.

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ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2018_301_146	31/01/2019	EC	Incident Reporting and Procedural Elements: IG requested EC seek input with Risk/Comms to include the procedural elements as well as the technical vulnerabilities considered, and think broadly about what this means about formal, regulatory incident reporting. The paper should explain precisely what these elements of risk are and can refer to caching as a mitigant, include what the SLA's are and review how the directory has performed against those SLAs over an historic time period. An update should then be provided to the February IESG and PMG/TDA should also provide input.	Update 20/02: Update provided in Programme Update in February IESG pack .	28/02/2019	Closed	28/02/2019
IESG_2018_301_148	31/01/2019	EC	Jira Ticket Closure: EC to discuss ticket closure categorisation with Simon Waller and the Testing Working Group.	Update 20/02: MI now planned to be available for April reporting.	28/02/2019	Closed	28/02/2019
IESG_2018_301_149	31/01/2019	MCH	Nesta: Miles C and GL to catch up re his point on the Global Open Finance Centre of Excellence can host this and run the data set and control it at the University of Edinburgh, which has a super computer set up for this purpose.	Update 20/02: MC met with NESTA w/c 11/02 to discuss options. <i>IESG Update: IG still not sure where OBIE sits on this and will discuss further in AOB.</i>	28/02/2019	Closed	28/02/2019

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Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2018_301_150	31/01/2019	IG	Articulating Success: IG/FR to figure out the next steps – working with AA, craft a memo how to do this, what is going to be addressed and obtain feedback.	Update 20/02: Further discussion and work required on this item. Item rolled and AA to follow up for March IESG . <i>IESG Update: further meeting is required and item is not fully finalised.</i>	28/02/2019 21/03/2019	Open	
IESG_2018_301_151	31/01/2019	EC	Working Group Rationalisation: FR to have offline discussion with AA/EC around consumer representation within working group set up.	Update 20/02: discussion still required. Item rolled to March.	28/02/2019 21/03/2019	Open	
IESG_2018_301_152	31/01/2019	CM	CR 54: CM to CM to review the CR, ensures it reflects the points of principles that OBIE had here and resubmit.	Update 20/02: new CR submitted for February IESG .	28/02/2019	Closed	28/02/2019
IESG_2018_301_153	31/01/2019	EC	ASPSP Calendar Concept: PM / EC to discuss ASPSP calendar concept and how UK Finance can disseminate information.	Update 20/02: Meeting held and broader ASPSP calendar being established in conjunction with UKF supported by FCA <i>IESG Update: there is a plan in process for creating the calendar; discussions have also taken place with FCA and GL community.</i>	28/02/2018	Closed	28/02/2019

1.c PROGRAMME UPDATE

1.c.i OBIE STATUS REPORT

- 1.6. **EC** advised the Amber status was not of major concern. The key things to highlight are the upcoming directory releases into production w/c 11 March, which have been in the sand box, and issues which relate to EIDAS and Release 3.1 have now been stabilised.
- 1.7. **EC** provided an update on the incident analysis on the directory and the ASPSP calendar. Activities that caused the outage have all been remediated and the incident reporting has been strengthened in the context of the directory (sandbox and production). An array of automation for tracking and reporting have been installed and discussed at PMG. More detail will be available in the coming weeks.
- 1.8. **IG** observed the directory was critical if the ASPSP was not caching; some are and some are not. **EC** advised that of the CMA9, there are two that currently do not cache, however, detailed discussions have been taking place to move towards a caching structure later this year. **EC** added that in a later release in the directory (late April), there would be an automated notification process. Currently, the notification of a revocation can only happen during business hours, but after April it will send automatic notifications out to the banks, which matures the caching concept for a number of them.
- 1.9. **DG** raised a concern around how long it would be cached for, the liability implication of getting stale and for a third party, who have had their regulatory status revoked. **EC** advised that the SLAs are much tighter now, and would not be anticipating multiple days of outage. **EC** advised that there were three levels that provide considerable protection. These are: a) caching, b) the infrastructure that sits within AWS; and c) the protection certificates. **RR** believed that a bank would be able to manually revoke a TPP and if the directory was down for a sustained period of time, there would be the opportunity for the **FCA** to get involved and advise the banks to pursue this process. **IG** stated this would be a sensible backstop, however, there would need to be a pre-agreed protocol. **EC** advised that the backstop would be manual checking. **IG** believed IESG was not the forum for this technical discussion but there was full transparency at TDA and if there were any further clarification questions they should contact **CM** or **EC** directly.
- 1.10. **TS** asked if the regulatory incident reporting could be looked at and how they divide up amongst the various parties. **EC** advised that from an incident reporting point of view that is with the regulated entities; the CMA9 have their regulatory reporting regimes as does every bank and it is that practice that is followed based on whatever the incident is. **TS** added that the EBA guidelines allow for delegation of that to a central entity, where that entity is running things and suggested that if it were OBIE they could be running reports for the entire ecosystem automatically.

ACTION: IESG_2018_301_159 - Nilixa Devlukia to discuss the EBA guidelines on regulatory reporting with particular regards to the delegation of incident reporting to third parties. It was suggested that this is put on the agenda for her next weekly meeting with the FCA.

Due Date: 21 March 2019

- 1.11. **GL** stated that in all the technical detail and discussions, he was hoping for more details around the process of releasing more items to the market. He stated the need to discuss when and how things would land and reasons for the timing.
- 1.12. **EC** provided an update on the ASPSP calendar. There are items in the calendar which are specific to the OBIE ecosystem, along with a broader array of points on implementation from the community that use other standards or their own APIs. The information is provided by the ASPSP itself and is not something that is created by either UK Finance or the OBIE. **EC** added that once the data begins to be populated, the summaries can then be publicised broadly across the TPP community.

- 1.13. **GL** believed that OBIE needs to present a more neutralised market style and hoped that Simon Waller's team would be able to complete the next step, while **PM** assists with the presentation. **GL** added that it would refer to compliance, security profiles, UK or other, API endpoints, information on who to talk to in developer portals and which DMS is in use, which are not necessarily related to OBIE specifications. **GL** stated that even though this is being hosted centrally it is important that it gives the opportunity for non CMA9 and non OBIE committed firms to write information to it. **GL** hoped that other firms would be unable to interfere with the data while it would be open to everyone. ETA for this is CoB 01 March.
- 1.14. **IG** believed this was a bigger scope than the ASPSP calendar was trying to address. **EC** acknowledged that this was the way the ASPSP calendar was built, and OBIE had worked with FDATA and other TPPs to ensure there is a set of comprehensive questions in place for the banks to answer.
- 1.15. **PM** agreed good progress had been made, and there was a list of agreed items, but understood those firms that were not enrolled on the Directory would not be able to write in their own information, and that a work-around needs to be sourced.
- 1.16. **GL** asked what percentage of ASPSPs in the UK market, or operating in the UK market are UK Finance members. **PM** advised that it was the vast majority, but did not know exact numbers; although there are 300 members. **IG** advised there were 100 ASPSPs enrolled in the directory. **EC** added there were 49 non CMA9 in the directory.

ACTION: IESG_2018_301_162 – EC to meet with the FCA / UK Fin to discuss proposals on how to encourage and incentivise ASPSPs to update the calendar.

- 1.17. **GL** advised the FCA have made it clear that they expect firms to be communicating through the **RTS** timetable and this will be included in communications to encourage activity. **GL** asked if **TS** community had any payment ASPSPs – could **EC** share the list of things being covered with **TS**.
- 1.18. **AL** advised that at the recent EBA meeting with API initiatives and other representatives from across the market, TPPs having sight of what firms are doing and having central point of reference was a common theme. **AL** added that one of the questions that came up a couple of times was how automated would some of these resources be, so that the TPP can go in and interrogate that type of information. **AL** was not sure if that was something that had been considered.
- 1.19. **CM** advised that OBIE were looking to solve some immediate needs in the UK market, extending beyond the CMA9 – to help TPPs have a high level of understanding or who is doing what and when. There is a more significant requirement that is emerging across Europe, where there are thousands of ASPSPs who are introducing different versions of standards, and cannot be solved quickly. **CM** added the Berlin Group, Stet and the other initiatives, regulators etc. are keen that we all work together to solve the problem that TPPs have got when they are going to launch services across Europe with what could be extreme variability.

1.c.i CMA9 UPDATE

- 1.20. **IG** noted that the CMA was not represented at the meeting today. **IG** advised this was the last IESG before the Release 3 on 13 March and the Monitoring team have been working closely with the CMA9 to understand where they are on the individual drops, mostly they are aggregating around March, and there will be an attestation process in the run up to that. **IG** advised that he needs to speak to the CMA next week and go through the full list of where all the individual pieces are and will then make some important decisions. **IG** invited questions from the CMA9 on their preparedness for Release 3.
- 1.21. **EC** provided an update on the Managed Conversion Launch Assistance (MCLA). It was reflective of the implementation plans from the CMA9 and others as they start to approach the March-June timeframe. **EC** commented that the provision of the new end points and App-to-App are to an extent disconnected. Once the new end point (V.3.1) is deployed, the MCLA approach will go through something similar to the Managed Roll Out in Release 1 and Release 2; this will be done on a gradual basis throughout the ecosystem. **EC** then provided an

update on App-to-App, which has slightly different timescales for introduction; some banks are later and delivery is by brand and device type. **GL** asked if it was OBIE's expectation is a release on 13 March followed by a roll out managed through to June. **EC** confirmed that was the case, adding that it might not take three months, but wants to ensure there is sufficient time to stabilise and resolve any defects that may arise.

- 1.22. **HP** stated HSBC were supportive and stressed the importance of giving the TPPs time to integrate and deprecate Release 1, which is not a PSD2 compliant format and make sure that September is not hit with problems.
- 1.23. **GL** agreed with **HP** except on the point relating to deprecation of Release 1, asking if that would be happening once everything is stable and ironed out. **GL** would like to see a smoothing effect so there is no deterioration of firms in the market using the API today, adding that it's not all about PSD2 compliance, but ensuring the market is able to continue using what they are currently working with until replaced by an improvement. **HP** agreed that HSBC were not supporting a hard stop. **IG** was also keen to ensure there were no switch overs as this has caused problems in the past. **EC** advised that as a parallel activity with the CMA9 end points, OBIE are also working with the live TPPs in the market and are aware of their plans for either upgrading to Version 2 or Version 3. **EC** added that he was not suggesting that all would deliver a Version 3 upgrade by the end of June, but there is phasing of movement between Release 1.1 to either Version 2 or 3. **EC** confirmed there had never been a statement of deprecation of Release 2 ahead of September. **GL** added that no one is using Release 2. **EC** advised that won't be the case in the near future.
- 1.24. **CA** believed the CMA9 need to consider deprecating later and Barclays need to actively give that commitment; she could not see why it would cause a challenge for the CMA9. **CA** was also concerned about Version 3.1, which in its entirety includes all products under PSD2 and for some firms, March will just contain current accounts, although there is a migration containing different products and **CA** believed that the CMA9 need to work closely with the TPPs on when those things are happening as there could be a risk of surprises. **CA** believed a piece of work was required to assess what is the worst that could go wrong and how that would be managed. **DG** was also in agreement and advised there were challenges finding TPPs that want to test with RBS for March, for 3.x. RBS have done early release for credit cards etc. which are by their nature released on 3.x because they are new, and the TPPs that RBS work with are working on Version 2 and they don't have a plan yet of when they are going to Version 3 – therefore creating a challenge. **CA** added that if TPPs have worries around Release 3.1, for firms that don't want to go to Release 2, they should be given the time and space to get to Release 3 in a thoughtful way.
- 1.25. **IG** believed the policy decision being discussed was to keep that last two Versions live, as a standard approach.
- 1.26. **GL** noted that in the original Managed Roll Out, there was testing in production because replication of a test environment was not possible with the CMA9. Today, the testing environments are nowhere close to the production environments and when this comes out in the market, we are going to be testing live again. Intense coordination is going to be required and the orchestration is going to be a very tough job.
- 1.27. **HP** noted that Version 3 brings a lot with it, including App-to-App. The CMA9 need to help firms across the line, the risk is that a lot of the benefits from March won't accrue into the ecosystem, but the intent is that we should seek to migrate firms that are working with the CMA9, so that they are on the right PSD2 compliance pathway.
- 1.28. **IG** observed that it was not being stated that Release 1/Version 1 stays live until September, nor all the last three versions have to be maintained. **HP** was not supportive of that. **IG** believed that it would be down to each individual bank being comfortable that 3.x has actually landed and then you turn of Release 1. **CA** believed this was fair, adding that Barclays would not be there by June, because of the move to 3.1, the move to additional products and a board ecosystem. **CA** would like a commitment to be given to **GL**'s community that is clearly not June, it's whenever the community is ready. It needs to be written down differently so that **GL** can communicate this to his stakeholders. **HP** advised he was happy for OBIE to act as an adjudicator for when a firm is ready to deprecate.
- 1.29. **GL** needed clarity: if a TPP is using Version 1, then reach a point where 3.1 is viewed as being "great" does that mean the TPP is also fully moved to 3.1. **EC** advised this was not the case, adding it was important, not just that the TPP has accepted that it is fit for purpose, but they have moved their in-market customers from whatever version

they are on to whatever version they going to. Once complete and the TPPs are active with the CMA9 that is the point when it can be deprecated. **IG** reiterated **HP**'s point on what if the TPP doesn't want to move. **EC** advised that he already know that all of the TPPs are moving, some to Release 2 and some to Release 3.

- 1.30. **MCX** sought clarification; that September would be the cut off non PSD2 compliant end points; the policy is for the last two variants to be supported at any one time. There seems to be an extra problem whereby a number of the TPPs still on V.1, not planning on moving to V, planning on going straight to V.3.1, therefore as all of the CMA9 have slightly different delivery plans for when we would decommission Release 1, there is value in checking where those delivery plans are and is there any more flexibility within the June to September window, to provide extra support to TPPs. G:
- 1.31. **GL** was aware that all were trying to work to a flexible solution, adding that if a TPP were in a position where they were ready, Version 1 would continue; any version should not be switched off because a data has arrived. The primary concern is that the relationship between the TPPs and the customers isn't broken, during the process where the ASPSPs are maturing its delivery.
- 1.32. **IG** summarised that OBIE need to be crystal clear as to what the criteria are for decommissioning Version 1, those criteria are not just a data, nor based on the stability of Version 3.x, they are also based on the number of active TPPs with real customers that are still using Version 1 and their plans for migrating over. This should then be taken through PMG. **EC** confirmed PMG had already discussed this. **IG** requested to review this and the send out as a communication to IESG.
- 1.33. **HP** was concerned that the CMA9 have to move at the pace of the slowest. **IG** advised this was based on firm level. **HP** added that the CMA9 should not be held at the pace of the slowest TPP, they cannot veto the CMA9 upgrading, in line with an agreed formula. The CMA9 are obligated to ensure it works.
- 1.34. **CM** suggested this is something that should be handled in the Testing Working Group and the Operational Guidelines, where examples are covered of what can be deprecated and when, so there may be a requirement to put some of those into the Operational Guidelines and share, so it is documented and all parties are clear about the criteria. **IG** suggested that this should also be noted in the attestation process
- 1.35. **GL** suggested organising a call with TPPs, where someone from OBIE talks through this page. **EC** advised that most of the TPPs are part of the Testing Working Group, where this is discussed in significant detail.
- 1.36. **IG** asked **EC** to liaise with **GL** to find out what the best forum is to deal with his request and suggested bringing a member of the CMA9 to provide constructive input.

1.c.ii *TPP FUNNEL*

- 1.37. **IG** noted the funnel continues to grow. **IG** advised that he had been approached by a number of TPPs who were happy with the decision around Account Holder Name and that it will now be included in the API. **IG** added that for non CMA9 ASPSPs, OBIE was trying to bring on more; and there were now 49 enrolled/enrolling in the directory. He was optimistic that there were another five over the next couple of weeks.
- 1.38. **EC** reiterated that Tesco and New Day were the most recent joiners and advised that there was active dialogue with approximately 30+ firms and discussions have taken place around terms and conditions.
- 1.39. **TS** asked if there were all UK banks. **EC** advised that some had non UK headquarters.

1.c.iii API KPI

- 1.40. **IG** observed the trend was positive.
- 1.41. **EC** stated a number of the CMA9 have put remediation activities into performance or availability which are beginning to show up in these numbers. **EC** expected API numbers to climb steeply and see more activity across the ecosystem along with more live PISP activity.
- 1.42. **CM** raised the following points:
- 1.42.1.1. Performance figures are encouraging, particularly when comparing API performance to screen scraping performance. He had no hard evidence on this, so would be useful to get some validation from TPPs.
 - 1.42.1.2. Concern raised at EBA Working Group was around availability for PISPs, they need to be closer to 100% for PISPs who exist in the market to move to Open Banking, or for new PISPs coming into the market.
- 1.43. **AL** advised there was a long discussion around this last particular point and payment status. The EBA and the Commission will probably come back to again at the next meeting. The TPPs in the room were making quite compelling arguments as it has led to some practical challenges for them and equally there were arguments that it was too late to start adding new requirements.
- 1.44. **IG** asked if the EBA Q&A tool was still the mechanism by which OBIE would hear things, or is there another mechanism. **AL** advised that there may be a mixture as the Q&A is quite static and difficult to add to, so a different approach may be required and there might be feedback at the beginning of the next meeting. **IG** confirmed that OBIE is a member of the group and will stay close to this matter.
- 1.45. **IG** confirmed that in terms of PISP activity, Adyen were now allowing real customers to purchase tickets via KLM. **EC** added that it is an open product and available to any merchant, with an active sales team, therefore volume is to be expected. **IG** asked if OBIE were getting comfort from the TPP and ASPSP side that the performance numbers were agreeable.
- 1.46. **RR** stated that for the second month in a row, the availability and performance figures for LBG are ones that he doesn't recognise, and the team doesn't understand that since they have reported 100%, have followed the MI SLA guidelines how LBG are now coming out at 95-96%. **RR** confirmed the LBG team have been trying to discuss with OBIE to understand the difference between what LBG are reporting and then what gets published.
- 1.47. **IG** stated he was frustrated that there was still no agreement on what the numbers are showing. Is the challenge process working? **EC** responded to **GL**'s question on whom at OBIE has responsibility for this; confirming it was the Operations unit. In terms of the broader question; there have been discussions with a number of the CMA9 around the period of availability monitoring and **EC** believed this was the case with the LBG numbers. **EC** believed OBIE and many of the CMA9 were now in a good position, but would happily engage with LBG to discuss their issues further.
- 1.48. **IG** requested that if any CMA9 participants were still not happy with the numbers, either write to **IG** over the next two weeks and before the next IESG, so OBIE can consolidate where there are discrepancies. It is important to move away from the debate around the numbers and look at what needs to be done to support this. **IG** added that prior to writing, it would be helpful for the CMA9 to liaise with **EC**.

ACTION: IESG_2018_301_155 – Following on from the challenge posed by RR re the MI numbers, an email will go out from the office of the Trustee informing CMA9 members that any disagreement with the KPI methodology reported should be reported to EC and then to The Trustee if said discrepancies remain unresolved. The email

will be issued from the Office of the Trustee and a two week period assigned for receipt and resolution by EC in the first instance.

Due Date: 15 March 2019

- 1.49. **IG** added that included in the MI will be the review of customer numbers; however he needs to discuss this with the CMA first. It is important to ensure those numbers are correct and agreed before landing them in the public domain.
- 1.50. **RH** stated there was an issue relating to customer numbers and success; as a smaller bank, is getting APBs to engage with them, it seems that by default the commercial organisations focus on the big four. **RH** advised that customers are approaching AIB wanting to use various apps/software and that company is stating that they will work with AIB next year. **RH** wanted to know how to encourage TPPs to work with them, which will then promote the use in numbers. **PM** echoed **RH**'s point, stating that large numbers of smaller or medium sized APSPs are reporting that issue across the ecosystem.
- 1.51. **IG** suggested **GL** and **RH** discuss this outside of IESG. **GL** referred to the TPP funnel chart, noting that 135 firms are still waiting for NCA authorisation and there are also 36 in the AIS category that will have operations that are likely to be ready to come to market in Version 3.1. **GL** expected the OB customer volumes to spike once Version 3.1 lands and firms move out of testing phase into production. **IG** added that clarity around Account Holder Name will help with adoption.

2.a CHANGE REQUEST 54: ACCOUNT HOLDER NAME

- 2.1. **IG** advised the team had worked through a set of standards to incorporate Account Holder Name (AHN) as there was some ambiguity around how the AHNs were defined; this has gone through TDA. **CM** advised that OBIE are publishing Version 3.1.1 and have already published the first release and are due to publish the final version in the next couple of weeks. This is a non-breaking change that includes some additional extensions to enable different types of account names to be provided in different circumstances. This CR is to ask the CMA9 what they are going to implement and by when, and confirm that it has gone to PMG for impact assessment. **IG** reiterated that this CR does not include an implementation date for the CMA9 and OBIE are intending to make sure the standard gets done and enables all participants to implement in time for September; or earlier if they can. With regards to the CMA9 there are bilateral discussions taking place that will cover this topic, and the CMA9 are to revert by 01 March with their view as to when they can implement
- 2.2. **CM** advised that the standard allows for the name of the account as displayed, allows for the full legal name of the account holders – a name of an individual, company, joint accounts or powers of attorney etc. It is flexible because there is some ambiguity around exactly what is required for what type of account. **CM** added that OBIE wanted this in the standards so that regulatory requirements can be met as soon as possible.

APPROVAL: IESG_APR_LOG_034 - IG approved Change Request 54 – Account Holder Name (AHN)

- 2.3. **IG** advised the European standards had done this already and asked if OBIE standards were harmonised with them, or are OBIE taking a different approach. **CM** was not able to answer the question.

2.b V4 PROPOSITIONS (AND IMPLICATIONS OF ANY RELEVANT Q&A) NUMBERS: P8, P9, P22, P2

- 2.4. **IG** summarised that this was the agreement of the proposition documents for the outstanding P items for Release 4/Version 4. **IG** reminded IESG that once the propositions are agreed then they go through a process for getting turned into standards. These items have been through a thorough consultation process and **IG** did not believe there was anything contentious.
- 2.5. **FR** raised a point on P2, which did have feedback provided; given the changes and that most items are optional for P2, **FR** observed that she did not see any of this feedback incorporated in the paper. Are they now off the radar – particularly relating to Redirection of Revocation? **CM** responded that this was still being looked at; this paper is

about providing a technical mechanic, which is optional – if access was switched off an ASPSP could notify the TPP. Access dashboards and what may or may not be required from a customer experience guideline point of view is still being looked at, and it not part of this core proposition.

- 2.6. **IG** advised that as there is more clarity from EBA/FCA there will be a need for the change request process to address those items. This is not the end of the story for this.
- 2.7. **MCX** clarified that OBIE are recommending to approve this, knowing that there is still some ambiguity in the legal position about what can be revoked and when, therefore the view is it will be approved and pick up anything else as it becomes clear in a change request. **IG** mildly disagreed with **MCX** wording, but believed there was sufficient comfort around what the functionality ought to be, and rather than wait for 100% clarity from the EBA and not produce any standards and have not ability to hit the September timeline, OBIE are trying to the best it can, given the limited certainty. **DG** asked if it was possible to get clarity sooner as it not just about the CMA9 investing in the standard, it's also the expense of developing those in the various channels etc. **DG** advised that expenses were already being incurred with development in mobile and corporate channels. **DG** added that items like Two Way Notice of Revocation – what if that is not going to be allowed; the RBS can stop spending on this item.
- 2.8. **FR** disagreed with **DG** and it does begin to get into a position where the consumer has little control and felt **DG** was suggesting there wasn't a need to show the list of consents or permissions that the customer has linked to their account. **FR** stated that to give customers the means by which to share their data, **DG** suggestion was off the table and stood in the face of good, clear, transparent principles. **DG** agreed with **FR** with his consumer hat on, yet RBS needs to understand if they can legally advise their customers that if they ask them to stop sharing their data, RBS must advise "no". **FR** added that consumers should be able to see a list of permissions they have granted; even if they can't stop them.
- 2.9. **IG** advised this proposition didn't relate to lists of dashboards. **CM** added this proposition was about the messaging/notification method by which, if a customer did revoke access at the ASPSP the TPP could be notified.
- 2.10. **HP** asked why the point was not resolved as to whether customers should be able to revoke; authority can be cancelled even if the consent between the customer and the TPP is maintained, then reauthorised just like it is when the 90 day period is up. **AA** agreed with **HP** and advised that it is being discussed with the **FCA** as the EBA position is not clear.
- 2.1. **IG** added that if OBIE is advised that it is non-compliant to show the consent dashboard then OBIE will have to review again. However this item is not in the P2 proposition document. **AL** stated it was worth noting the Q&A that does answer some of the questions; but there is a live, on-going debate in other jurisdictions with regulators. **AL** advised that there was nothing in PSD2 that states a bank should do any of this; so on the face of it from a TPP perspective it could be argued, the more customer functionality you offer it has the potential to disrupt or create problems for the TPPs. **IG** agreed that it can't be an obstacle or frustrate the TPPs, but if there is clear evidence that the consumers appreciate having it; **IG** would have to revert and look at the research that OBIE did. If it proves helpful to package up ASPSPs conversations with the FCA then it should be made available. **RR** stated that customers expect to be able to go to a place that they trust and stop something; if they trust the TPP that is great, however the customers will expect to be able to switch items off at the bank. **RR** added that if a customer then becomes fed-up with a TPP they don't want to be told by their bank that they have to go and talk to that organisation and regulators need to be sticking up for the customer.
- 2.2. **FR** questioned whether a consumer should be able to revoke at the ASPSP and a second layer of should the consumer be able to see a list of permissions at the ASPSP. **FR** believed there is limited consumer representation at the various jurisdictions and was concerned about the nature of the conversations taking place, where there is scant regard being given to what consumers want and need. **FR** asked if OBIE, the TPPs and as a group could agree on a basic list of being able to see.
- 2.3. **IG** suggested taking this off line, it was a fair and reasonable point but OBIE must work under the construct that they have been given. **FR** reiterated her point and requested the group to put pen to paper and for the Trustee to

champion it with the other jurisdictions. **CM** suggested a potential route for this was to raise it at a topic at the next EBA Working Group. **FR** asked if she could join the next meeting. **HP** stated that if OBIE would like to put this forward based on the research they have, HSBC would be happy to support OBIE in that forum. **HP** advised that HSBC believe this is the right customer outcome. **CM** advised that this was included as a recommendation for all ASPSPs and a requirement under the CMA order for the access dashboards in the customer experience guidelines. If this is going to be redacted, that would need a change request, and this is a separate issue to P2.

- 2.4. **IG** believed that in Europe or elsewhere, no one had said that one cannot offer a dashboard. **FR** stated it takes just one Q&A in Europe to blow this out of the water. How is this stopped as other jurisdictions are lobbying against these dashboards?
- 2.5. **RH** observed that the CMA9, consumer reps, TPPs do not object in the UK. **IG** noted that under the CMA Order, as Trustee he cannot require, nor can the CMA9 do anything that would make them non-compliant with PSD2 and added that OBIE would do their best to combine forces, but was a conversation that **FR/AA** should have.
- 2.6. **RH** also wanted to reinforce the point around Commercial APIs and that when they are built they should not require the CMA9 to move to a Version 4 or Version 5 of the API Standards otherwise it will create work for TPPs and the banks for things that are non-mandatory.

APPROVAL: IESG_APR_LOG_035 - As this had gone through a thorough consultation process, and were ready for these propositions to be signed off, in order that they can be turned into standards. IG approved the V4 propositions.

2.c SIR UMBRELLA AND TPP STANDARDS PLAN (I.E. CEG & OG UPDATE)

- 2.7. **IG** advised the IESG that this was an update on an additional document that the team want to create that will help participants in the ecosystem to better navigate the suite of standards that have been created; which is more than just technical standards and includes the Customer Experience and Operational Guidelines. **IG** did not believe it was contentious and shouldn't contain any new information. **AA** agreed, it was a wrapper document that brings everything together.
- 2.8. **IG** advised that when conversations take place with non-CMA9 ASPSPs and TPPs they are a little confused about some of the items that have been created, so this is a housekeeping exercise.
- 2.9. **FR** asked a question relating to the MI and where does that land? **AA** advised in effect it will land within this document.

2.d TRUSTMARK

- 2.10. **IG** stated that in the last meeting the opportunity to discuss Trustmark was lost, however, the paper has been resubmitted to this meeting. **EC** and the team have created a process for investigating Trustmark over the course of the next three month and page 71 shows the short term plan **IG** would like the team to execute and return to the March IESG with a more detailed update.
- 2.11. **EC** added that there are a number of issues that have been identified and there is a need to reach a house view on; he was sure these were not the only issues and would welcome input from all communities to ensure OBIE have answered all the issues. **EC** advised that he had also spoken to the team at PayUK who had interest in doing this too.
- 2.12. **IG** noted there was more insight available on what a consumer wants and this also tends to tie in with some of the work that **FR** has been conducting with the Lending Standards Board (LSB) who have been looking at Code of Conduct and suggested that some of that information could be shared with IESG after the meeting. **IG** agreed that he would also sit down with the LSB to understand some of their perspectives. **IG** added that this idea stemmed

from a meeting with the Heads of Retail (HoR), and was an open ended investigation, as there was nothing else comparable.

ACTION: IESG_2018_301_154 – With regards to Trustmark throwing up issues around insights from a consumer point of view, IG suggested that FR should share some of the work she has done (Code of Conduct) with the Lending Standards Board (LSB) to IESG members

Due Date: 21 March 2019

- 2.13. **PH** advised that he was discussing this with his team and the Pay.UK services, and there was a need for something to build confidence for customers. What wasn't needed was a plethora of Trustmarks as this creates more confusion, adding it is important for OBIE and Pay.UK to be joined up.
- 2.14. **GL** advised IESG he was sceptical, and felt because the market place was fragmented it would be difficult to badge something as a regulated actor as not meeting the Trustmark would add to the confusion. **EMB** believed this would help drive everyone in the same direction and felt the Trustmark would make it easier for alignment in terms of TPPs being up-to-date with the versions of the standards etc. **GL** asked if it would be considered to put the Trustmark around the screen scraping model as most of the APSPs in Europe are going to be using screen scraping. The TPP will have half their business through an API and half through screen scraping and although not against the concept, but trying to create a wrap around for a brand that is using multiple things because that is forced on them and they have no choice, will create confusion.
- 2.15. **FR** provided feedback on recent research: Code Collaboration (Account Technologies – a member of FDATA) and the LSB had done some work with leaders and representatives from the Open Banking community, that showed there is a desire for something that reaches beyond the OBIE space. **FR** added that focus has been on consumer outcomes and what consumers have been looking for. Data security and privacy came up as a concern, along with how to get conduct and ethics right in the market, and how do firms communicate effectively with consumers. **FR** noted that most of the ASPSPs will be using screen scraping which will provide a challenge and cause fragmentation in the market.
- 2.16. **IG** noted there are clearly many models of Trustmarks so an open investigation is required. **IG** requested EC progress with the plan as it set out in the paper.
- 2.17. **PM** asked in what part of OBIE governance is the work going to be done, and how do those around the table contribute. **EC** stated that OBIE will consult the same way as they do with any standards, as questions arise and are reviewed it goes through a consultation process via confluence. **EC** advised that were there is research that needs to be done; the outputs will be shared in a similar fashion. It is an open and transparent process. **IG** asked if it would be helpful to set up a kick off meeting. **EC** agreed.
- 2.18. **AL** shared **GL's** concern, and asked if it would be useful to consider the Trustmark that is broad enough to support the Commercial APIs and encourage the market to move away from screen scraping; outside of PSD2.

ACTION: IESG_2018_301_15 - EC to arrange kick off meeting to discuss the research that needs to go into the Trustmark work, following which a consultation process via confluence would be put in place. In the interest of promoting an open and transparent process, output will be brought back to IESG in March.

Due Date: 21 March 2019

2.e COMMERCIAL APIS

- 2.19. **AA** advised that OBIE will call for interest in being on a Commercial API Committee (name to be confirmed), this paper advises to be aware of that and the paper gives more detail on what is required. The final group will be ratified by IESG, no decisions will be made within OBIE; final decision ratification of the makeup of this committee will be made by IESG.

- 2.20. **IG** touched on HPs earlier point and that one of the first things that should be reviewed is derived from the API EG recommended functionalities and any other elements that may be considered important to support the standard.
- 2.21. **IG** and **AA** would be happy to have offline conversations for anyone wishing to join the group, with **AA** advising that the date of the 6 March would be extended.
- 2.22. **HP** continued to have concern around the governance point. There is an Order which asks the firms to fund CMA required objectives, the CMA9 have voluntarily agreed to extend that to PSD2 requirements; and accepted the outputs from the API Evaluation Group fall within that to make sure the standard is fully PSD2 compliant for any UK firms that want to use it. **HP** added, anything beyond that is not currently funded and has no governance framework, and was not sure that IESG has any legitimacy in deciding what should go into that pot. **HP** felt it was important not to “get ahead of ourselves” with this working group, where it has no mandate. **IG** advised that for the moment it won’t look at any of those items, and there are discussions with the CMA9 to what extent they want to support it. But for the moment it is only looking at API Evaluation Group recommended functionalities, and within those, there is a need to look at priorities.
- 2.23. **HP** believed that once moving into the commercial arena, if **TS** or **GL** members are in discussions with a firm, there is an opportunity to create something for customer benefit; we can prioritise the things that are going to be done, rather than a long list of design standards which may go nowhere.
- 2.24. **FR** asked if there was a point for this group, in terms of the future governance of Open Banking; is there a plan to start having sessions at this level to work out what happens with OB; what is happening over the next few months and the rest of the year. There seems to be a level of uncertainty, which includes the existence of IESG. **FR** would like to see something that becomes a standard agenda item. **IG** suggested addressing this in the item on Future Governance of OBIE. However for the moment, this group has been put together at the request of the CMA, under the Order and will continue. There is nothing that **IG** was aware of that would rescind IESG any time soon.

3 AOB

3.a P14/P15 (Account Comparison and Dashboards)

- 3.1 **AA** thanked all for their feedback on the draft trustee letter, and provided an overview on the current status. **IG** advised the Trustee letter was presented to IESG in draft because the evaluation group proposed such material changes. **IG** wanted to seek further input. The next step is to resubmit the letter to the CMA in the next couple of days and will also then recirculate to IESG.
- 3.2 **FR** raised a point around P15, regarding onward provisioning, where data is being shared with a non-regulated party. **FR**. Asked for confirmation the onward sharing piece will be looked at, in part because it does have some implications for ASPSPs who act as AISP, because legally on that basis they could share data without secure customer authentication once it has been aggregated. **AA** agreed that it will be looked at but could not confirm when the output of that review will be. **FR** would like to look deeper into the legal framework and other aspects that would give consumers control. **GL** believed the customer experience guidelines could be updated to state “I wish to share this data” with a specific provider. **RR** added that it must be clear to the consumer that they are sharing their data outside the world of PSD2, Open Banking and the various protections and provisions that go with that. **RR** believed that this requires a separate consent as it could not be considered to be informed.
- 3.3 **IG** suggested that if anyone wants clarification on the content of the letter, please speak directly to **AA**, and advised that two parties had reverted with feedback.

3.b NESTA

- 3.4 **IG** advised that discussions with Nesta were progressing well. At February IESG we outlined the proposal and Nesta have agreed to it. **GL** had suggested involving the Edinburgh resource in supporting the challenge and that is being worked through at the moment.

- 3.5 **GL** advised the overall approach to this seems to be well thought through, however there are a few items that still need work and those discussions are taking place with OBIE and the FCA on core requirements and participant ethics.
- 3.6 **IG** proposed to bring a final paper defining the shape of what this looks like; either at the next steering group, where it can be formally agreed or it can be circulated beforehand for comments before formal agreement. **IG** confirmed that no trigger had been pulled on an open up challenge for consumer yet; but the discussions are progressing.
- 3.7 **GL** is going to write directly to the CMA9 to give them context, which includes a defined data safe haven, a safe place that data can be shared with a legal parameter around it that enables research to be undertaken. **GL** advised that this will enable the Nesta challenge to be underpinned by highly sophisticated capabilities and allow perpetuation for firms coming in, in the future and to help the regulators look at ethics, how AI will be used in markets to prevent discrimination and a variety of other use cases.
- 3.8 **IG** suggested for an email on this and circulate to all, and explain in more detail what is meant by a data safe haven and the links to the Nesta piece.

3.c FUTURE OF OBIE

- 3.9 **IG** summarised the recent meeting: it was the second meeting that a subgroup of IESG had held, plus there were guests invited to the session. The first session in 2018 was a broad discussion, whereby people expressed their views on what could be the right outcome. The most recent session this week, was one where we talked in more concrete terms about different scenarios available to the OBIE. It was helpfully informed by a conversation that OBIE and Pay.UK had had a few weeks prior, where we worked through all of the functionality of OBIE and tried to understand what the issues were for moving them over to Pay.UK. Also covered was a conversation that the regulators had about some of the options available to OBIE. **IG** advised the recent conversations were very open and there was intent to explore different options and a sharing of perspectives. Next steps were created, and the team understood they were not a decision making or governance body, just a forum for discussion. It was noted that one of the specific actions was two representatives from the CMA9 were going to go back to the other CMA9 to bring them up to speed (RR and Luke Ryder from Barclays), another action was for the OBIE to have session two with Pay.UK which is happening next week, and will try to solve the issues identified in the first meeting. Finally, **GL** was going to prepare a draft, consultative policy paper around what Open Finance means more broadly for the TPP community badged as FDATA.
- 3.10 **GL** stated that the idea was to build a skeleton design of what Open Finance would look like, its componentry, which of the assets may be reused and how one would try to design that to make it less fragmented. **GL** stated that consultation from key stakeholders and trade association from different corners of the market would be required. **GL** advised that DWP are working on something, trade associations like TISA, Open Savings and Investments etc. are working on things in the Open Finance domain. **GL** advised that many TPPs in the market are using a variety of assets from different sources and we don't want this to fragment away to different liability models, different dispute resolution mechanics for the same customer's data. **GL** stated the policy paper will be designed to step through from a logical perspective centred on the customers' needs and how to build this out and would be followed by a meeting to flesh it out and finalise.
- 3.11 **IG** suggested liaising with **AA** for further details on views or papers.

3.d MASTERCARD

- 3.12 **GL** asked if any of the CMA9 were not planning on using the OBIE Dispute Management System (DMS). **FR** asked if any of the CMA9 planning on using the MasterCard DMS offering.
- 3.13 **GL** stated discussions had taken place around having one mediocre DMS, would be better than ten really good ones. **GL** believed everyone agreed that if two TPPs were using different split resolution capabilities, and linking

through to banks that were also using different DMS mechanics; the ability for the customer to navigate through that process would be zero. **GL** added that MasterCard have recently announced an industry consultation to create the DMS for the PSD2 marketplace, and 90% plus of the transactional volume is spoken for in this room today. **GL** preferred that the work OBIE has already done is not wasted, but would rather have MasterCard own it than have two, he added that he would prefer OB own it as it is in a neutral space and involves all of the community and it would also be preferable to only have one resolution mechanic.

- 3.14 **IG** stated that it was explicit in the Order that the CMA9 build a customer redress mechanism, under the auspices of the OBIE.
- 3.15 **FR** stated that there was no requirement for them to use it and was a question that was asked by one of the CMA9 in a previous meeting. **FR** believed because it was voluntary there was no requirement to use it.
- 3.16 **RR** didn't believe the CMA9 hands were bound; if, individually or collectively it is decided the MasterCard is the better way to go, it sounds like the CMA9 can discharge their obligation through OBIE and select the MasterCard proposition. **IG** stated that only with express approval of the Trustee. **RR** added that there was a need to understand what was best for the customer and then work out the next steps and if there was agreement that this was the correct way to go, it is in your gift as the Trustee to decide that it is a reasonable discharge of our obligations. **RR** believed it was worth taking a look at, but agreed with **GL**'s point around standardisation.
- 3.17 **GL** was concerned that the customers interests might not be looked after and with another commercial entity putting their hand up, it's not in the competitive domain and if they end up taking market share off TPPs, that doesn't interact with the OBIE version then it would be a bad customer outcome.
- 3.18 **PH** questioned the point about standards and rules for a DMS service into the market, and didn't believe that it could be said that there will always be one system/capability that sits within this growing ecology.
- 3.19 **IG** agreed with RR/PH/GL, the right thing needs to be done for the customer, but as far as he was concerned the CMA Order is absolutely explicit, the CMA9 have to build a customer redress mechanism, if we decide that we want to use MasterCard, or decide to set a standard and allow commercial entities to build against our standards, that discussion can take place. **IG** would be very surprised if any of the CMA9 were undertaking this without consulting with him first. **MCH** commented on the irony in that MasterCard were included in the original short list proposal but was quickly discounted.
- 3.20 **IG** asked the CMA9 to respond to him, quickly and directly if they are planning on using anything other than has already been agreed with regards to the DMS.
- 3.21 **HP** wanted it noted that HSBC had not had any conversations with MasterCard and have no intention of doing so.
- 3.22 **IG** reiterated to let him know ASAP and would be requesting that IC raise this matter in the bilaterals and add to the agendas.
- 3.23 **FR** pointed out that as OBIE own the DMS system, data can be collected. As soon as another entity is used, no data would be available, but it is helpful to see complaint data. **FR** would look to seek reassurance from MasterCard that this data would be available.
- 3.24 **RR** was confident that LBG were not in discussion.
- 3.25 **PH** shared a concern about asking institutions to declare something that is commercially sensitive.
- 3.26 **DG** confirmed RBS were intending to use the OBIE DMS platform.

- 3.27 **GL** advised MasterCard are presenting to TPPs and other parties about launching an industry consultation to develop a DMS mechanic for the industry. **GL** questioned whether the OBIE DMS had not properly landed with the community.
- 3.28 **IG** would also like the CMA9 to advise if they were participating in the consultation process with MasterCard

ACTION: IESG_2018_301_164 – Follow up on two questions posed to CMA9 from the office of the Trustee. Firstly, are CMA9 members using the OB DMS process? Secondly, are any of the CMA9 members participating in the MasterCard consultation process?
Due Date: 15 March 2019

3.e P7

- 3.29 **FR** believed verbal feedback had been given on P7, but was not sure it had been closed and would like to see it finalised. A solution had been found but not documented. **AA** agreed and will review

ACTION: IESG_2018_301_161 - AA/FR to follow up on P7 with an offline discussion; AA to provide a refresh paper in March IESG
Due Date: 21 March 2019

3.f P9

- 3.30 **MCH** asked what the update was on P9. **IG** advised that it was just discussed at the meeting in Europe but there was nothing concluded. **MCH** disagreed and asked for it to be properly discussed in this forum, either by an extraordinary meeting or at the next IESG.
- 3.31 **IG** advised he would take this away and consider. **CM** added that the EBA are considering whether there is a clarification that they can issue on what is the requirement.
- 3.32 **IG** wrapped up the meeting with two final items: firstly introducing Sally as the new IESG Secretariat; taking over from Julie who is staying in Open Banking, in a new role. **IG** then advised Mark Mullen would no longer be joining IESG, he has chosen to step down because of many other time commitments. **IG** added that he will discuss with BR the kind of replacement needed and how they want to reconstruct that representation. In his absence **IG** thanked him for his contribution.
- 3.33 **IG** closed the meeting.