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FCA eIDAS Consultation

OBIE's review webinar – slides and Q&A

Thursday 5th November
9:30am – 11am

Contact comms@openbanking.org.uk
with any questions based on
this material.

These Q&As are for high level information purposes only and do not constitute legal advice or guidance. Participants are solely responsible for ensuring they meet all applicable regulatory requirements, including those that change as a result of Brexit and eIDAS.

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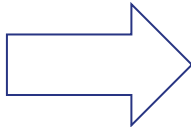
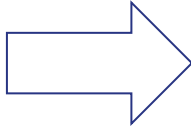
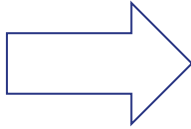
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Summary of the FCA's Decision

[Read the FCA's statement and supporting documentation here.](#)

Context from the EBA:

- *“UK...PSD2 eIDAS certificates ...will be revoked”*
- FCA proposal published on 4th September, responses by 5th October
- Our focus: minimise disruption to ecosystem (users and participants), by allowing alternative certificates and transition arrangements

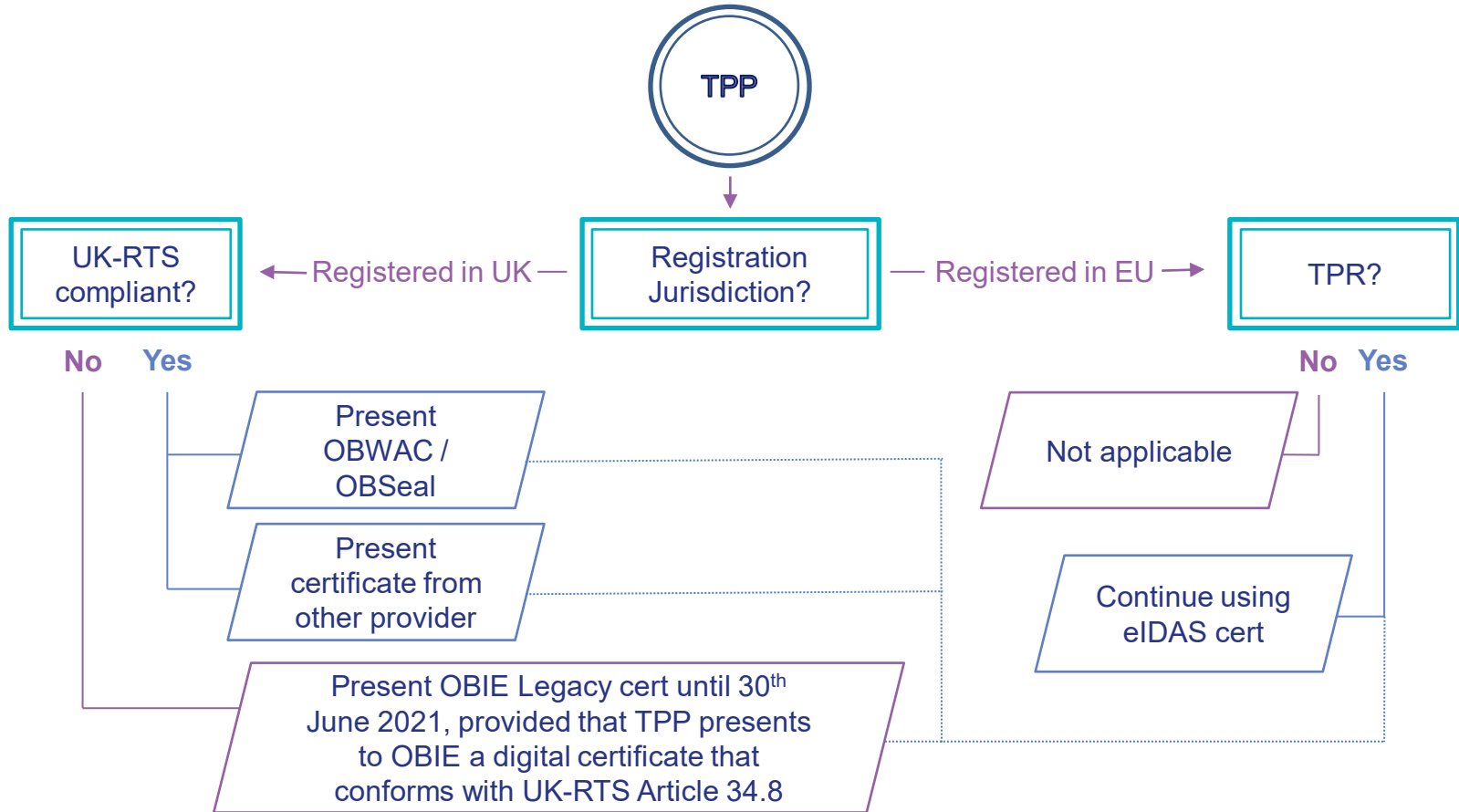


Final decision from FCA:

- Article 34 of Draft UK-RTS amended, requiring ASPSPs to accept eIDAS certificate + one other electronic form of ID issued by an independent 3rd party
- Criteria of this alternative certificate less prescriptive than originally proposed, but Firm Reference Number (FRN) required
- New transition period to end June 2021, allowing certificates not meeting these criteria to be accepted if obtained from an API programme provider (subject to validation of a compliant certificate)

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Impact on TPP Ecosystem Participants



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Impact on ... UK open banking Participants

TPPs

- Firms should begin preparing alternatives to eIDAS certificates. OBWAC and OBSealC certificates are valid from 1st January 2021 and will remain valid beyond the 30th June 2021 extension cut-off date. OBIE Legacy certificates will not be valid for PSD2 access beyond this cut-off date.
- We advise firms to access these alternatives as soon as possible to begin testing with ASPSPs

ASPSPs

- From 1st January 2021 UK-registered ASPSPs will need to begin accepting both eIDAS and one other alternative certificate type.
- Where those ASPSPs are enrolled in the OBIE directory, the appropriate certificates would be OBWACs and OBSealCs – not OBIE Legacy certificates
- ASPSPs should have a migration path in place to avoid PSUs having to authenticate outside of the existing 90-day cycle, and communicate with TPPs via the Transparency Calendar

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Impact on ... EU open banking Participants

TPPs

- Firms who are trading in the UK under the Temporary Permissions Regime can continue using an eIDAS certificate – but there is nothing to stop them from using appropriate alternative certificates

ASPSPs

- EU-registered ASPSPs can continue to use the OBIE directory – or other appropriate service – to validate the certificate and/or regulatory status of TPPs

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Minimising disruption to end-users

- OBIE's priority throughout the rest of 2020 and the extension period until June 30th 2021 is to minimise disruption – both to ecosystem participants and to the people and businesses that use open banking-enabled applications and services
- To support as smooth a transition as possible, OBIE is encouraging ASPSPs to ensure that their published details on the [Transparency Calendar](#) (a public, open Confluence page run by UK Finance and FDATA for all open banking participants, not restricted to OBIE participants) are up to date
- We will also work with TPPs to support their own migration projects and enable clarity into the transition approach and status of their respective ASPSP counterparts
- Firms who are enrolled on the OBIE Sandbox or Production directories should contact their IES Team representative or the OBIE Service Desk with any questions or queries

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Minimising Disruption – Transparency Calendar

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ASPSP Documentation

ASPSP Documentation

Transparency Calendar

Created by Adam Pretlove (Unlicensed)
Last updated Oct 19, 2020 by Praveen Ponnunmy



History

Version 1	Version 2	Version 3	Version 4
Version 5	Version 6	Version 6.1	Version 6.2
Version 6.3			

UK Finance, FDATA and the Open Banking Implementation Entity (OBIE) are taking steps to improve the flow of information in the market between ASPSPs, AISP's and PISPs on approaches to secure communication under the PSD2 RTS – regardless of the API standard or approach to secure communication being used.

Completing the form will help demonstrate and enable engagement with newly regulated providers. It will also help smooth the transition for customers of third party providers who were in the market prior to 13th January 2018.

This Transparency Calendar has been set up to facilitate this voluntary flow of information.

It is for each institution to determine whether they answer each question or provide the information in this way – although we would encourage them to do so.

The Regulatory Technical Standards under PSD2 set out how the secure communication between newly regulated providers, including AISP's and PISPs, will take place with payment account providers. It sets the 14th September 2019 deadline. ASPSPs are also required to make available technical specifications for their dedicated interface and provide support and a testing facility by 14 March 2019. The FCA is open to receive exemption requests from the contingency mechanism and has asked for requests to be submitted before 14th June.

Below is are 5 'Summary Views' of the information held within the ASPSP's Transparency Calendars. These include 'Contact Details', 'Major Milestones', 'Key Implementations', 'Technical Details', and 'Method of Identification'.

These Summary Views only display 'selected' information from the calendars.

To see all the information held in the calendars then see the [Transparency Calendar#Full View](#) sections below or visit the individual ASPSP calendar pages.

Questionnaire and Q&A

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Minimising Disruption – Transparency Calendar

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ASPPS Documentation Overview Space Settings SPACE SHORTCUTS Confluence Directory OB Service Desk Website PAGES ASPSP Implementation Guides Space access Transparency Calendar ASPSPs

- ABC INTERNATIONAL ...
- AIB Group (UK) plc
- Alpha FX
- American Express
- APS Financial Limited (...)
- Arbuthnot Latham & Co...
- Archive - Transparency ...
- Bank of Ireland (UK) Plc
- Barclays Bank UK Plc
- BFC Bank Limited
- Brown Shipley and Co ...
- C. Hoare & CO.

eiDAS

Current and Future eiDAS Implementation

ASPPS	Directory?	Production Interface Implementation Date?	Date of Current eiDAS Implementation?	Current Certificates used for Identification?	Current Certificates used for Transport?	Current Certificates used for Signing?	Date of Future eiDAS Implementation?	Future Certificates used for Identification?	Future Certificates used for Transport?	Future Certificates used for Signing?
ABC INTERNATIONAL BANK PLC	MCI	2021		2021			No future update currently planned.			
AIB Group (UK) plc	Open Banking	13 Mar 2019	14 Sep 2019	OB Transport + ClientID + Secret OBWAC / OBSEAL / QWAC	OB Transport / OBWAC / QWAC	OB Signing / OBSEAL / QSEAL	06 Jun 2020	N/A - No further updates planned	N/A - No further updates planned	N/A - No further updates planned
Alpha FX	Open Banking	30 Aug 2019					No future update currently planned.			
American Express	Preta	14 Jun 2019					No future update currently planned.			
APS Financial Limited (Cashplus)	Open Banking	13 Sep 2019					No future update currently planned.			
Arbuthnot Latham & Co., Limited	Open Banking	06 Jun 2019 - Currently Live Proving (Whitelisting in Place)	Mar 2020	OB Certs, eiDAS	OB Certs, eiDAS, QWAC	OBSEAL, eiDAS, QSEAL	No future update currently planned.	eiDAS QWAC		eiDAS QSEAL
Bank of Ireland (UK) Plc	Open Banking	17 Jun 2019	14 Sep 2019	OB Transport + ClientID + Secret OBWAC OBSEAL QWAC QSEAL	OBWAC	OBSEAL	No future update currently planned.	No future update currently planned.	No future update currently planned.	No future update currently planned.
Barclays Bank UK Plc	Open Banking	14 Mar 2019	September 2019	OB Transport + ClientID + Secret OBWAC	OB Transport / OBWAC	OB Signing / OBSEAL	March 2020	OBWAC / QWAC	OBWAC / QWAC	OBSEAL / QSEAL
BFC Bank Limited	Open Banking	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
Brown Shipley and Co Limited	Preta	02 Jul 2019 (re-direct browser to browser)		QWAC	QWAC		No future update currently planned.			
C. Hoare & CO.	Open Banking	AISP - September 2019					No future update currently planned.			
Capital One (Europe) PLC	Open Banking	13 Sep 2019	N/A	OBIE non eiDAS-like certificates	OBIE non eiDAS-like certificates	OBIE non eiDAS-like certificates	10 Mar 2020	eiDAS QWAC certificates	OBIE QWAC-like certificates	OBIE QSEAL-like certificates

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Question & Answer session Replay

This section of the document provides a 'replay' of the Questions that were raised on the OBIE's consultation webinar on the 5th November, as well as answers from the OBIE team.

Please use the navigation below to jump directly to the most relevant section for you.

[Policy / Extension Period Questions](#)

[Impacts on UK-registered TPPs](#)

[Impacts on UK-registered ASPSPs](#)

[Impact on EU-registered ASPSPs](#)

[Impacts on non-OBIE Directory ASPSPs](#)

[Technical Certificate Questions](#)

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Question: To confirm, TPPs using OBIE Legacy certificates must migrate to another certificate form by 30th June 2021?

Answer: Yes, that is correct.

Question: Why has the FCA selected a transitional arrangement ending June 2021, instead of a permanent arrangement. This approach adds burden to TPPs and banks in H1 2021 (after we've all been through Brexit burden) - and risks disruption to end-users

Answer: The FCA feels that it is important to model their approach in line with Europe at this present state. It is too early to tell whether that position may evolve from a broader policy perspective. The FCA's perspective is intended to ensure that activity that relies on 'equivalence' can continue, via remaining as close as possible to EU rules and principles.

Question: Does the FCA consider OBIE to be a Trusted Third Party?

Answer: The OBIE is considered by the FCA to be an API Programme.

Question: Why do the FCA rules go further than PSD2 in requiring banks to check the authorisation of the TPP? Under PSD2, banks were supposed to trust eIDAS certificates (and the issuer) as proof of a TPP's authorisation.

Answer: First, it's important to clarify that PSD2 only requires banks to accept eIDAS certificates as proof of their **identity** – not their authorisation(s).

Secondly, the rules that are in place suggest that ASPSPs should be confident that they have carried out the appropriate checks. How those checks are done, and whether they are outsourced or performed in-house, is a different matter and one that the FCA has not specified. A market exists with multiple providers who enable that to be done for ASPSPs. There exist already within the open banking ecosystem, including instances where firms are using MCIs, where there may not be an automatic check of the certificate and provenance. The FCA's approach is intended to maintain those principles that already apply – rather than introducing new or different steps or processes.

Question: Can a TPP hold its new certificate, but still use OBIE Legacy certificates?

Answer: OBIE Legacy certificates should not be accepted for PSD2 purposes after the 30th June 2021 but could be used alongside other valid certificates until that date. OBIE Legacy certificates will still be available for non-PSD2 purposes after this date.

Question: Will the OBIE's remit be extended into 2021 to support the transition post-Brexit with respect to continued growth of the ecosystem?

Answer: The OBIE was set up to deliver the CMA Order and there is work going on to work out how services should be provided once the Order has been implemented.

Question: Will these legislative changes be recognised and reflected in the EU RTS?

Answer: We do not anticipate any changes to the EU RTS, which will remain in force in the EU. The UK RTS was published by the FCA in draft form some time ago, taking the EU provisions and making minor amends such as changing Euros to Pounds. It took Article 34 as it was, which recognised eIDAS certificates. When the EBA announced that eIDAS certificates would be revoked from UK TPPs, the FCA had to update draft UK RTS Article 34 to ensure that UK TPPs could operate within the UK post-Brexit.

Question: Will the UK's ICO have any involvement in this process, given the data implications?

Answer: Not to our knowledge.

Question: What is the expected end user impact from those ASPSPs who do not currently accept OBWACs and OBSealCs certificates?

Answer: Consumers may need to re-authenticate when ASPSPs migrate between certificate types. However, this will depend on each ASPSP's specific implementation – the technical Standards support seamless migration. All open banking participants are encouraged to work proactively with us to minimise disruption to end users during this transition. The [Transparency Calendar](#) will be a crucial resource in the weeks and months ahead.

Question: What are the expected costs of the new certificates? Can UK firms get a discount?

Answer: All OBIE-issued certificates are available at no cost to firms who are enrolled in our Directory.

Question: If we already hold OBWAC/OBSealCs (from before moving to eIDAS) do we need to re-apply or can we use existing certificates?

Answer: Yes you can continue to use those OBWACs and OBSealCs.

Question: My firm is new to open banking and have just managed to create OBWACs / OBSealC and access token to begin API development. Should we stop what we are doing now, and wait to see what (if any) changes may come into the Directory Sandbox as a result of the new certificate requirements?

Answer: While we cannot provide any guarantees in terms of future developments between now and the possible revocation of eIDAS certificates for UK TPPs on 31st December 2020, or about how the situation may evolve during the transition period until 30th June 2021, it appears likely that usage of OBWACs and OBSealCs will result in a broad level of coverage.

It is still 'early days' since the Draft UK-RTS was published, and while OBIE does not foresee any large changes, we are still completing a detailed impact assessment to ensure that we are fully-aligned with the Draft UK-RTS.

All open banking participants – including those using non-OBIE Standards – are encouraged to work proactively with us to minimise disruption to end users during this transition. The [Transparency Calendar](#) will be a crucial resource in the weeks and months ahead.

Question: Will OBWACs continue to require an FCA-compliant certificate behind them?

Answer: Our analysis is that OBWACs and OBSeals already meet the technical requirements of the UK RTS as stated in <https://www.fca.org.uk/publication/policy/ps20-13.pdf>

Question: Can a non-OBIE certificate issuer, issue certificates that are not yet compliant (for example with regard to FRN) and can be used from January 2021?

Answer: The FCA publication focuses on the obligations on the ASPSP in relation to certificate acceptance as stated on their website “An ASPSP must ensure that its interface is capable of enabling a TPP to identify itself using an eIDAS certificate as well as at least one other electronic form of identification issued by an independent third party. However, ASPSPs can enable TPPs to use a certificate obtained from a provider of an API programme that does not meet the requirements of the revised Article 34. The use of these certificates is only valid when TPPs have also presented a compliant certificate to that API programme. The provider of the API programme should validate the certificate and continue checking, on behalf of the ASPSP, the status of the TPP’s compliant certificate. This transitional arrangement ends on 30 June 2021.”

We would encourage any issuers to discuss this issue with the FCA directly to get a better understanding of applicable requirements.

Question: Should I get OBWACs and OBSealCs and start using them with UK ASPSPs to avoid disruption?

Answer: We can only make statements based on the UK-RTS recommendations. There is a possibility that on 31st December 2020 the EBA will request that QTSPs revoke eIDAS certificates from UK-registered TPPs, the QTSPs will comply, and the certificates will be revoked. We can only recommend that TPPs who only have eIDAS certificates prepare for that possibility.

From the 1st January 2021, the UK RTS applies, and UK ASPSPs must support eIDAS certificates as well as certificates from at least one other API Programme.

The FCA statement was released earlier this week and ASPSPs are still reviewing its contents. We hope that the API Programme they choose to implement will be the OBIE Directory – it is live, proven and well established. However the market may well decide to move in another direction.

There are a large number of ASPSPs that do support OBWACs and OBSealCs, and registering for these certificates and testing them now would be a prudent direction to give you good coverage of the market.

Question: Can we work to ensure auto-migration of at least the CMA9 ASPSPs?

Answer: We will work with the CMA9 to try to ensure as smooth a migration as possible. However, this will depend on each ASPSP's specific implementation – the technical Standards support seamless migration. All open banking participants are encouraged to work proactively with us to minimise disruption to end users during this transition. The [Transparency Calendar](#) will be a crucial resource in the weeks and months ahead.

Question: After 31st December, EU-based TPPs will continue to use eIDAS certificates – so UK-based ASPSPs must still support eIDAS certificates?

Answer: Yes that is correct – UK-based ASPSPs must support eIDAS certificates and one other alternative.

Question: Will the existing OBIE eIDAS certificate validation API continue working as expected?

Answer: Yes, the certificate validation service (CVS) will continue to work as it currently does.

Question: Are ASPSPs mandated to accept OBWAC and OBSealCs by the end of December 2020?

Answer: The UK-RTS will require that ASPSPs can accept certificates from one alternative API provider (other than eIDAS certificates). OBWACs and OBSealCs are one such alternative.

Question: For ASPSPs who accept eIDAS certificates via OBIE proxy, do these ASPSPs need to accept eIDAS directly?

Answer: Yes that is correct – UK-based ASPSPs must support eIDAS certificates and one other alternative.

Question: Will it be possible to continue to associate OBIE Legacy certificates to a software statement, in use cases outside of open banking API calls?

Answer: Yes, use of OBIE Legacy certificates for other purposes will continue.

Question: After 31st December 2020, presumably the only EU TPPs that can access UK ASPSP accounts will be those that have entered the Temporary Permission Regime (TPR). Is that correct?

Answer: Yes, that is the general expectation For more information of TPR, please visit the FCA website: <https://www.fca.org.uk/brexit/temporary-permissions-regime-tpr>

Question: Is there any clarity on how are ASPSPs expected to check a non-UK TPP is on the TPR?

Answer: This information can be checked via the SCIM APIs or DCR inner SSA.

Question: Would an ASPSP be required to check the authorisation status every time a TPP presents, or will a check of the SSA during DCR suffice?

Answer: That would be down to an individual ASPSP's risk posture. At present, if a TPP loses authorisation, it does not mean that eIDAS certificates would be revoked. It would be good practice to regularly check the SCIM APIs as they provide an additional belts and braces check.

Question: Will ASPSPs that do not currently support deletion/deregistration need to come up with a process for switching the certificates associated to a specific SSA?

Answer: This should be no different to rolling certificates for an SSA when they are going to expire..

Question: My migration process is likely to be multi-step – will the Transparency Calendar be able to support / reflect this?

Answer: The [Transparency Calendar](#) is a public, open Confluence page run by UK Finance and FDATA for all open banking participants, not restricted to OBIE participants. OBIE's IES Team provide and maintain a summary dashboard, but the underlying content is provided by individual ASPSPs.

We are working to ensure that the Transparency Calendar is prepared to support ASPSPs in communicating their progress and readiness. If you have any queries at all about this process, we encourage you to reach out to OBIE.

Question: Will there be any modifications to Dynamic Client Registration (DCR)?

Answer: No – the current OBIE software_statement field has the flexibility to provide multiple authorisations. This will be leveraged to provide information about TPPs on the TPR list.

Question: Should I be preparing to revoke eIDAS certificates from the 1st January 2021?

Answer: ASPSPs cannot revoke eIDAS certificates – only the owner or the QTSP who issued the certificate can revoke it from UK TPPs. The EBA has announced that it expects QTSPs to revoke the certificates. It is unclear whether all QTSPs will in actuality perform that revocation, either in time for the 1st January 2021 or at some point after that.

Despite this, the UK's open banking community has to assume that from the 1st January some if not all of the eIDAS certificates currently issued by QTSPs to UK TPPs will be revoked.

Question: Is the Certificate Validation Service still relevant?

Answer: The CVS is still available for validating eIDAS certificates

Question: Noting these changes apply to the UK RTS, what is the EBA's view? Is the EBA open to this alternative type of certificate? Is it legislatively mandatory for EU-based ASPSPs to accept this alternative?

Answer: The UK-RTS is the legislation that will apply in the UK following the Brexit transition period. We are unable to comment on the view of the EBA or the regulatory obligations for EU-based ASPSPs, and encourage ASPSPs to raise any concerns with the EBA or their regulator directly.

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Answer: Yes, use of OBIE Legacy certificates for other purposes will continue.

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Question: Is the Certificate Validation Service still relevant?

Answer: The CVS is still available for validating eIDAS certificates

Question: How will an ASPSP not enrolled in the OBIE Directory validate the certificates?

Answer: The OBWACs and OBSealCs certificates contain both OCSP and CRL endpoints – which ASPSPs can use to validate without being enrolled in the OBIE Directory. The OBIE's JWKS Keystore is also publicly available.

In cases where a TPP loses one of their PSD2 roles, the expectation is for that participant to voluntarily revoke their certificate – however in cases where this does not happen or where there is a delay, OBIE does have a business process to revoke certificates.

OBIE's Developer Zone FAQs are publicly available. In addition, this webinar raised the issue that OBIE may go further in terms of formally publishing the various certificates and URLs required for non-enrolled ASPSPs.

If non-enrolled ASPSPs have any further comments or queries about the usage of OBWACs or OBSealCs, we encourage those firms to contact us promptly – we are keen to work proactively with all firms to minimise disruption.

Question: Will the new OBWACs and OBSealCs certificates contain the Software Statement ID like OBIE Legacy certificates? This is useful for TSPs so they can identify the client from the certificate.

Answer: No – these certificates follow the ETSI standard – and as such do not have the Software Statement ID in them.

Question: About the existing relationships with OBIE Legacy certificates: does the guideline recommend that moving them over to OBWAC/OBSEAL maintains the consents and client-id/secrets?

Answer: We will work with ASPSPs and TPPs to understand and communicate any possible issues arising from the difference in DN between OBIE Legacy and QWAC certificates in the context of onboarding having used `tls_client_auth`.

Question: Seamless transition problems could look to be around when TPPs have previously on-boarded with `tls_client_auth` and the difference in subject DN between an OBWAC vs QWAC?

Answer: We recognise this issue, and will work to address this situation with the CMA9 and other ASPSPs via the [Transparency Calendar](#).

Question: Do OBIE Legacy certificates (OB transport and OB signing) contain the TPP's role information? If not, during the transition period how can the ASPSP identify the roles of that TPP? Is it by using the OBIE validation service?

Answer: No, OBIE Legacy certificates do not contain role information. Nor do they contain FCA registration numbers. ASPSP should use these alongside the APIs.

When open banking launched on the 13th January 2018, what we provided for validation of authorisations (i.e. their role) was a SCIM endpoint that allows the ASPSP to check the authorisation either in real time or that could be cached. Since then we've developed the Certificate Validation Services which is primarily designed to validate eIDAS certificates – although it can also be used to validate certificates of any type – and that returns authorisation data for the TPP.

Question: Will OBIE Legacy certificates remain available for ASPSPs to use after June 2021?

Answer: OBIE Legacy certificates will be available for non-PSD2 purposes, but should not be accepted for PSD2 purposes after the 30th June 2021.

Question: When a TPP is obtaining an OB certificate, will there be clear instruction that this should be done in line with the ETSI standard? s5.2 defines that RolesOfPSP must be a sequence of RoleOfPSP which is a sequence of roleOfPspOid, roleOfPspName.

Answer: OBWACs and OBSeals meet and conform to the structure of QWACs and QSealCs. As such they contain the PSD2 roles and the FRN, as required by the FCA.

OBWACs and OBSealCs were developed to align with two standards as they stand today. From a technical perspective, they align with ETSI. From a regulatory perspective, they align with the recently published UK-RTS.

If there are any opinions to the contrary, or suggestions that participants view them as not aligning with either standard, the OBIE would welcome any and all feedback.

Question: At the moment a TPP has to present an eIDAS certificate to OBIE to be issued with an OBWAC or OBSealC. Next year will a TPP have to present an FCA-compliant certificate to OBIE to be issued with an OBWAC or OBSealC? Or from 1st January 2021, will OBWACs and OBSealCs be considered as FCA-compliant certificates in their own right?

Answer: From 1st January 2021 the OBWAC will be the FCA-compliant certificate. The requirement to hold an eIDAS certificate will be dropped.

Question: Do OBIE provide tools that support participant ASPSPs that wish to validate the authorisation status of non-enrolled TPPs? While I appreciate that SCIM APIs are available, do they work for non-OBIE participant TPPs?

Answer: The Certificate Validation Service can be used to validate an eIDAS certificate for a non-enrolled TPP and retrieve its authorisation data. Alternatively, an ASPSP can use the NCA API to retrieve any TPP's authorisation data. The SCIM APIs can only return data for TPPs that have enrolled with OBIE.

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Thank you

Contact comms@openbanking.org.uk
with any questions based on
this material.

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