

Version 3.1.9 of the OBIE's open banking Standard

Consultation webinar Tuesday, 24th August 2021

Classification: PUBLIC



Housekeeping

Welcome to the *Consultation Webinar on Version 3.1.9 of the OBIE Standard*.



All participants have been 'muted' on entry. Please do not 'unmute' unless asked.



Please keep your camera off to avoid confusion.



This event is being recorded by OBIE and may be repurposed.



We will be facilitating a Q&A session – please submit questions via the chat.

Disclaimer

The contents of these slides do not constitute legal advice.

While they have been created with regard to relevant regulatory provisions and best practice, they are not a complete list of the regulatory or legal obligations that apply to Participants.

Although intended to be consistent with regulations and laws, in the event of any conflict with such regulations and laws, those regulations and laws will take priority.

Participants are responsible for their own compliance with all regulations and laws that apply to them, including without limitation, PSRs, PSD2, GDPR, consumer protection laws and anti-money laundering regulations.

Competition Law

Many of you are from competitor organisations. As you will be aware it is critical that we all comply with competition law. If you are in any doubt about competition law compliance you should consult your compliance team.

The discussions between the attendees should be limited to discussing issues of general concern and you must not share or discuss any information that is commercially sensitive and not in the public domain – that includes: current or future prices, strategies, matters about customers or suppliers. You can and should share your expertise about the matters that are specific to today's agenda and can talk about matters that are public.

If any topic is raised which you feel uncomfortable discussing, just let me know and we will immediately adjourn discussions on that point.

Agenda

Time	Agenda item	Speaker
13:00 – 13:10	Welcome & Introduction	Fiona Hamilton
13:10 – 13:20	Industry Consultation update	Fiona Hamilton
13:20 – 13:40	CEG updates: Dashboards and QR code redirection	Matt Wallace
13:40 – 14:00	Considerations when using VRPs for Sweeping	Richard Mould
14:00 – 14:20	API & MI Specification updates	Freddi Gyara & Glorria Dsouza
14:20 – 14:30	Q&A and close	All

Consultation process



Consultation details

This versions includes updates on:

- A2(b)(iii) – Consent and Access Dashboards
- A10 – Sweeping, with specific focus on third party guidance when using variable recurring payments for sweeping
- Amendments to API & MI specifications resulting from change requests & known defects
- Various Trustee actions

The OBIE welcomes responses to the consultation from all interested parties. The consultation process will take place between the **16th August and 3rd September 2021**.

- Written consultation responses are due by midday on 3rd September
- Please submit one response per organisation for each artefact.
- Responses are deemed to be non-confidential.
- Specification changes will be subject to Technical design Authority approval prior to submission to Implementation Entity Steering Group meeting
- Consultation responses will be reviewed, and the responses published, before the September Implementation Entity Steering Group meeting

Link to [consultation artefacts and feedback pages](#)

CEG updates: Dashboards



CEG – Dashboards updates – Background

The dashboards material in the CEGs has been significantly revised

- Reflect outcomes of A2(b)(iii) Roadmap evaluation (see next slide) and the OBIE common terminology document (to be released)
- Given the recent mandating of sweeping via VRP and general push towards Smart Data, dashboards will play an increasingly important role in the open banking ecosystem
- We hope this updated material will encourage both TPPs and ASPSPs to revisit and enhance their dashboards and ensure their customers are aware of the control that their consent and access dashboards provide them with



Impact of FCA consultation CP21/3 on the material, now expected to be published early Q4

- IESG agreed to update the CEGs for 3.1.9 knowing that additional material on “reconfirmation of consent” will likely follow¹; this may also impact other aspects e.g. display of 90 days at the ASPSP
- The timelines mean changes won’t be implemented until next year, and a significant amount of material is not impacted by the FCA consultation; the material will also remain relevant to non-UK TPPs and ASPSPs
- For CMA9 implementation, the timeline for any mandatory elements (such as naming) will not start until the FCA decision is reached and we have updated the CEGs to reflect the final decision – the date for this has not been set but will be either December 2021 or March 2022

1. Depending on the FCA’s decision on their proposal

CEG – Dashboards updates – Trustee Actions

Trustee Action	
A1	The OBIE should update the CEGs to include principles and examples of best practice ASPSP access dashboards and TPP consent dashboards . These updates must be taken to the ecosystem for consultation.
A3	The OBIE should update the CEGs with specific guidance on placement of dashboards using best practice examples but there is no need for OBIE to consider user testing at this point.
A4	The OBIE should update the CEGs with best practice examples of notifications .
A5	The OBIE should add an optional requirement to the Checklist such that TPPs provide clear instructions to customers about the location and purpose of the consent dashboard.
A6	OBIE should [develop a consistent naming framework for dashboards and include in the CEGs]
A7	Update the CEG to clarify the expected customer experience that TPPs should implement when a PSU revokes access at their ASPSP , including the technical aspects TPPs need in place to support the guidance. This should include best practice examples and wireframes.
A9	...[add] example in the CEGs of how multiple refresh could be implemented at the ASPSP access dashboard as an optional requirement.
A12	The OBIE should update the CEGs to emphasise the need for TPPs to provide information relating to agents to ASPSPs and to include agents on their consent dashboards.
A13	The OBIE should add examples to the CEGs to show expectations regarding information on consent dashboards regarding TPNPAs with whom a TPP shares data on an ongoing basis.
A14	The OBIE should add an optional requirement to the CEG Checklist for TPPs to display information about all parties that receive customer data from them directly on the consent dashboard.
A15	...provide additional guidance regarding the display of agency arrangements on ASPSP access dashboards in the CEGs.
A16	The OBIE should ensure any work for VRP/Sweeping regarding dashboards is in line with the updates to the CEGs that will be forthcoming as a result of the other actions detailed in this letter.

CEG – Dashboards updates – Principles

Principle 1: Easy to find and locate

- Designed and tested with the direct involvement of real customers
- Available on all relevant channels
- Named appropriately, ideally using the agreed open banking terminology of “open banking connections” for the dashboard space, “open banking connected services” for an access (ASPSP) dashboard and “open banking connected accounts” for a consent (TPP) dashboard

Principle 2: Intuitive to use and understand

- Include clear and simple status messages and dates
- Ability to easily cancel or revoke live connections
- Provide relevant additional detail as optional view beneath the summary

Principle 3: Be as transparent as possible

- Include a history of expired or revoked connections
- Include all relevant parties on the dashboard, extending to agents, TPNPAs and other fourth parties, where relevant

CEG – Dashboards updates – Relevant links

- To stress the importance of dashboards, we have created a dashboards space within the CEGs which can be seen here - <https://standards.openbanking.org.uk/customer-experience-guidelines/dashboards/about/v3-1-9-draft/>
- The change log providing an overview of the new material on dashboards can be found here, including guidelines on PSU Notifications - <https://standards.openbanking.org.uk/customer-experience-guidelines/change-log/v3-1-9-draft/>
- There are also a number of new Checklist items to reflect the A2(b)(iii) Trustee Actions which can be seen here – <https://standards.openbanking.org.uk/customer-experience-guidelines/customer-experience-checklist/explanation-of-the-customer-experience-checklist/v3-1-9-draft/>
- **Please provide your feedback by Friday 3rd September using the relevant form found here - <https://openbanking.atlassian.net/wiki/spaces/WOR/pages/2181333431/Feedback+-+CEG+Consultation+-+V3.1.9+Draft1>**
- **Please do not provide feedback relating to the implications of the FCA's consultation – we understand things will need to be revised if the FCA's final decision is a change to the RTS**

CEG updates: QR Code Redirection



CEG – Redirection with TPP Generated QR code

- Trustee Action 10 from the A7 RCA on consent success work stated that:
“the OBIE should update the CEGs to showcase the example of TPP-provided QR code and work with the ecosystem to ensure TPPs are aware of it, including publication on the OBIE website. This should also be used to remind TPPs to review and test the parts of the customer journey they control on a regular basis and to consider measures they can take to reassure customers about the safety and security of using their services to minimise drop out.”
- For 3.1.9 the CEGs have been updated to reflect this requirement – the relevant material can be found here - <https://standards.openbanking.org.uk/customer-experience-guidelines/authentication-methods/redirection/tpp-generated-qr-code/v3-1-9-draft/>
- Please provide feedback here by Friday 3rd September - <https://openbanking.atlassian.net/wiki/spaces/WOR/pages/2181333431/Feedback+-+CEG+Consultation+-+V3.1.9+Draft1>
- For those that missed it, an article was published to satisfy the Trustee Action back in March - <https://openbanking.medium.com/tips-for-customer-experience-qr-codes-ba549969334>

Considerations when using VRPs for Sweeping



Considerations when using VRPs for Sweeping

- New section providing guidance for TPPs
<https://www.openbanking.org.uk/wp-content/uploads/Sweeping-VRP-customer-protection-guidance-August-2021-1.pdf>
- Highlights some of the obligations PISPs have under existing regulations
 - Conduct obligations and customer outcomes
 - Vulnerable customers
 - Product / service development
 - Payment Services Regulations 2017 (Defective transactions, Unauthorised Transactions)
 - Complaints processes
 - How existing regulatory framework enables customer protection
- Two Sweeping and VRPs specific areas
 - Definition of Sweeping
 - Setting appropriate Consent Parameters

Definition of Sweeping

Sweeping is a generic term for the automatic movement of funds between accounts. For the purpose of the CMA Order, OBIE has proposed a specific definition, limited to the movement of a customer's own funds between accounts owned by them. Payments made to other individuals or other companies, e.g. paying for goods or services, would be excluded under this definition.

For a VRP transaction to be able to meet the definition of “Sweeping” it needs to meet the following criteria:

- i. The source account needs to be a PCA or BCA.
(PCAs or BCAs which require multi-authorisation are explicitly excluded from the definition. Joint accounts typically do not require multi-authorisation as both parties have full authority to make payments and so would be included in the definition.)
- ii. The destination account is any account into which a domestic payment can be made by the payer's bank's direct channel¹.
- iii. Both accounts are UK sterling accounts.
- iv. The payment can be an unattended payment, not requiring any interaction by or presence of the PSU at the time of making the payment²
- v. The transaction is between two accounts belonging to the same person or legal entity³

1. For example, savings accounts, building society savings accounts using a roll number, or personal credit card accounts are valid destination accounts.
2. It should be noted that the customer will need to be present when the mandate for the payment service is set up.
3. For the avoidance of doubt, it should be noted that the destination account may not have a unique sort code and account number, for example e-money accounts, building society roll number accounts and head office collection accounts for loans and credit cards may have common sort code and account numbers but a unique reference in the transaction will ensure the payment is applied to the correct customer's account.

Setting Appropriate Consent Parameters

- FCA approach document states that consent needs to be clear, specific and informed
- Consent parameters need to be set to facilitate meeting this requirement
 - Appropriate to the specific use case
 - Appropriate to the customer's circumstances
- Need to monitor over time
 - Consider headroom
 - Consider dormancy
- Some examples provided:

Use Case	Potential Parameter Considerations
Subscribing to a fixed term savings plan (e.g. Christmas savings club)	The duration of the consent parameters should not exceed the duration of the plan and the maximum level should be reasonable in light of the customer's financial position (e.g. ensuring they have sufficient funds to cover living expenses)
Sweeping round up transactions into a savings account	The parameters governing frequency of sweeping should align to the agreement in the sweeping service. (e.g. if the service specifies weekly sweeping, then the VRP parameters should reflect that), and the maximum amount per transaction should reflect that these will be a combination of a number of individual transactions that are each less than £1 each (if proposition is to round up to the nearest £1).
Sweeping excess cash into a savings account	The parameters governing the maximum amount that can be swept into savings should be lower than the customer's income less "essential outgoings".
Repaying a loan	The frequency and quantity of the repayment schedule should align to repayment schedule in the loan agreement. If the borrower falls into arrears and the lender wishes to make use of a VRP to conduct additional collections of funds this would have to be specifically agreed with the customer.
A savings plan that has not been used for a period of time	A customer may have set up an enduring savings plan and so the VRP Consent Parameters had an open ended expiry date. If the customer's circumstances are such that the plan has not been used for a number of months the PISP needs to consider whether they still have the customer's explicit consent to conduct that transaction. This will be dependent on the specific proposition and the communications between the PISP and the customer. PISP's may be aware that a Direct Debit mandate expires if it has not been used for 13 months but the PISP may choose a shorter period of time to reconfirm explicit consent with the customer.

Documentation links for guidance regarding sweeping

Considerations for using VRPs for Sweeping

- <https://www.openbanking.org.uk/wp-content/uploads/Sweeping-VRP-customer-protection-guidance-August-2021-1.pdf>

Feedback

- <https://openbanking.atlassian.net/wiki/spaces/WOR/pages/2181333566/Feedback+-+Sweeping+VRP+Customer+protection+Consultation+-+V3.1.9+Draft1>

API specifications



API specifications – Relevant links

API specifications

- [Version 3.1.9 API Spec changes](#)
- [Known Issues](#)

Feedback

- [API specs Feedback link](#)

MI specifications



ASPSP MI – Relevant links

MI Requirements

- [MI Requirements for ASPSPs](#)
- [Change log](#)

Data Dictionary

- [Data Dictionary for MI Reporting](#)
- [Example Reporting Template](#)
- [Change log](#)

Feedback

- [ASPSP MI Feedback link](#)

ASPSP MI key updates

MI Table	Change
TAB 5 - Payment Adoption	<ul style="list-style-type: none"> Clarification on inclusion of transitioned state in successful single domestic payments Amended cross tab validation on successful and rejected payment
TAB 7 - Daily Volumes	<ul style="list-style-type: none"> Clarification on API calls rejected status to count only once Clarification on API calls not authorised by PSU Updated Daily volume example diagram with missing elements
TAB 4A - Enhanced PSU Adoption	<ul style="list-style-type: none"> Clarification on Active PSU with examples
TAB 4B - PSU Consent Adoption	<ul style="list-style-type: none"> Added clarification on inclusion/exclusion of CBPII resources on few fields where relevant. Clarification on revoked consents to include revoked at TPP
TAB 3 - Auth Efficacy	<ul style="list-style-type: none"> Removed separate reporting for PIS-VRP based on CR Clarification or Condition change on Consent requiring authentication, Authentication attempted by PSUs, Authentications successful, Authentications failed, Confirmation accepted by PSUs, Confirmation rejected by PSUs. Updates to remove all cross validation with TAB Daily Volumes and TAB PSU Consent adoption. Added example illustration of Auth efficacy. Consent success rate calculation and major drop off points Added flow diagram to show co-relation of auth efficacy attributes with endpoints.
TAB 8.7 - Variable Recurring Payments (VRPs)	<ul style="list-style-type: none"> Note to reflect reporting for Sweeping & VRP

TPP MI – Relevant links

MI Requirements

- [MI Requirements for TPPs](#)
- [Change log](#)

Data Dictionary

- [Data Dictionary for MI Reporting](#)
- [Change log](#)

Feedback

- [TPP MI Feedback link](#)

TPP MI key updates

MI Table	Change
TAB 2.1 – API Endpoint List	<ul style="list-style-type: none"> Added VRP endpoints
TAB 1 – Overall Performance	<ul style="list-style-type: none"> Added field to measure failed API calls where response is not received.
TAB 2 - Auth Efficacy	<ul style="list-style-type: none"> Added attributes to measure consents abandoned by PSU before redirection, consents abandoned by TPP before redirection, average journey time Added example illustration of Auth efficacy. Consent success rate calculation and major drop off points
TAB 4 - PSU Consent Adoption at ASPSP level	<ul style="list-style-type: none"> Added attributes to measure PSUs used OB API services for the first time and total PSUs used API services. Clarification on Active PSU with examples and Active SME Businesses Renamed TAB to measure MI at ASPSP level
TAB 4A - PSU Consent Adoption	<ul style="list-style-type: none"> Added new MI Table to measure PSUs that used OB API services for the first time and total number of PSUs that used API services at TPP level.
All TABs	<ul style="list-style-type: none"> Removed Freetext field.

Q & A

