**DATA STRATEGY SPRINT 2 QUESTIONS**

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| **Submitted by:** |  |
| **Company name:** |  |
| **Choose one of the following:** ASPSP/TPP/TSP OR OTHER |  |
| **Contact Details:**  email & mobile |  |
| **Permission to share submission with the Committee** | Please confirm with either YES or NO |

We welcome evidence-based responses to the questions posed by the Joint Regulatory Oversight Committee (Committee). Please complete your responses in Word.

Written submissions will not be attributed to you, your firm or association and will be presented in any report on an anonymous basis unless otherwise requested by the contributor.

Please indicate above if you are happy for your submission to be shared with Committee members. If appropriate, please provide a non-confidential version for sharing.

**Please focus your responses on those questions for which you have relevant evidence. It is not necessary for you to respond to all of the questions.**

**Please note the deadline for the written submissions is noon on Wednesday, 16th November.**

**Section 1 - What do we need more evidence on ?**

**QUESTION 1.1**

Statistics in relation to attempted and successful fraud cases of Open Banking payments against other direct banking channels and granular data on the frequency, types, value, use cases of attempted fraud, successful fraud and “false positives” cases of Open Banking payments.

1. What are the key metrics TPPs and ASPSPs should provide data on to enable JROC to have a view on current levels of fraud? Please share case studies of attempted and successful fraud cases that highlight key system vulnerabilities.
2. How should data collection be operationalised, including who should take this forward, in the short-term and on an ongoing basis as open banking+ develops?
3. Should this insight be shared across ecosystem and what is the best way to do this?

**Response**

**Section 2 - What can we do in the short-term[[1]](#footnote-2)?**

**QUESTION 2.1**

In the first sprint many of TPPs identified a number of additional customer attribute data that would improve their own risk scoring. However, some TPPs and all of the banks questioned whether TPPs can realistically play a key role in fraud detection given the disparity in the information available to them. What are the pros and cons of providing additional identity-related information to TPPs? Would the standards need to be updated and what is the implication on timelines?

**Response**

**QUESTION 2.2**

1. What are the barriers to the consistent adoption of transaction risk indicators by all?
2. What is needed to remove those blockers?
3. What are the costs for ecosystem participants and the time needed for implementation?
4. Should there be a regulatory requirement to use TRIs? Could a similar approach to the RTS Transaction Risk Analysis exemption (based on actual fraud thresholds) be used?

**Response**

**QUESTION 2.3**

How can regulators better support the development of propositions that benefit consumers in vulnerable circumstances, promote financial inclusion and ESG? For example, should there be more targeted support from the FCA’s Innovation Pathways or use of the sandbox? Are there any short-term opportunities for the industry to support consumers and small businesses through the cost-of-living crisis and how could regulators facilitate this?

**Response**

**QUESTION 2.4**

A respondent mentioned the benefits of being able to access data from sources such as National Savings & Investment to open banking. Are there other example sources which should be considered? What is needed for this to happen in the short term?

**Response**

**QUESTION 2.5**

Other respondents indicated that open banking data in other jurisdictions has emerged as an effective and scalable use case to support credit decisioning/lending , particularly for SMEs? What more is required to expand usage of open banking data in this space in the short term?

**Response**

**QUESTION 2.6**

We have asked the ecosystem sprint to consider error messages and in particular the additional fields needed and the costs associated with those. From a data sharing perspective specifically, please highlight if there are any messages of particular importance.

**Response**

**Section 3 - What are the longer-term[[2]](#footnote-3) changes ?**

**QUESTION 3.1**

How should transparency and end-to-end visibility of the end recipient of data shared, including onward sharing, be improved? What are the preferred solutions and alternatives? What are the pros and cons?

**Response**

**QUESTION 3.2**

Could the sharing of authorisation and consent data through API be a solution to facilitate the development of secure consent management services (dashboard like features)? What are the pros and cons and costs of development? What are the challenges to implementation?

**Response**

**QUESTION 3.3**

Can solutions that support consumers in vulnerable circumstances, such as bereavement, delegation of authority for accounts, etc, be developed under the current framework? What is needed for such development? Do the standards need to be updated to allow for more data to be shared?

**Response**

**Section 4 - Which actor(s), including the Future Entity, should play a role in operationalising the items outlined (in Sections 1-3)?**

**QUESTION 4.1**

What is the role of the future entity in supporting ongoing evidence collection (outlined in section 1) and the delivery of any of the changes highlighted under the short term and long term categories (sections 2 & 3)?

**Response**

**QUESTION 4.2**

What are the roles of industry and regulators in operationalising evidence collection and the delivery of the proposed solutions?

**Response**

**QUESTION 4.3**

Should a premium API ecosystem develop for data? If so in what areas?

**Response**

**QUESTION 4.4**

What in your view are the top 3 short term priorities and top 3 longer term priorities to be addressed in a roadmap for the future development of open banking+ data sharing? If there are data sets that should be prioritised (for example, data related to savings accounts, identify attributes, consent, etc.), please provide rationale and evidence. What would be reasonable timeframes for these to be achieved?

**Response**

**APPENDIX – SUPPORTING EVIDENCE DATA STRATEGY SPRINT 2**

Where you wish to provide supporting evidence, please embed these or provide the links to them below. Please do not email them as attachments.

1. “Short-term” is defined as 12 – 18 months [↑](#footnote-ref-2)
2. “Long-term” is defined as 18+ months [↑](#footnote-ref-3)