

2 September 2021

Strategic Assessment Team  
Consumer Data Right Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

### **Consumer Data Right - Strategic Assessment Consultation**

Dear Sir/Madam

Thank you for the opportunity to provide input into the review of the Consumer Data Rights strategic assessment.

#### [About Gateway Association & Transaction Exchange \(www.gate.asn.au\)](http://www.gate.asn.au)

The Gateway Association and Transaction Exchange (GATE) wishes to make a limited response to the Consumer Data Right – Strategic Assessment consultation with a focus on potential changes that could fast-track the CDR rollout.

GATE is a non-profit association which is the collective voice of Gateway Operators. GATE was formed to represent, promote and advance the interests of its members in connection with developing, participating in or governing messaging systems or networks.

GATE members include ClickSuper, MessageExchange, QuickSuper, SunSuper and SuperChoice. Combined our members provide data and payment transaction services to more than 98% of Australian employers across all sectors of the Australian economy.

Collectively our members send more than 1 billion digital messages each year across the Australian economy.

GATE members are experienced in supporting the design and delivery of significant Government reforms that have delivered digital services to employers.

#### **Response**

GATE views CDR as the next significant driver of change across the Australian economy. The opportunity (and risks) associated with open-data are considerable.

GATE holds the approach taken to previous digital reforms (especially SuperStream) in high regard given the balance achieved through the joint leadership of Treasury (policy/legislative design) and the ATO (administrative/systems delivery) in association with key industry stakeholders.

As a model we believe that a similar approach will provide traction for CDR to be implemented across the Australian economy by 2030.

### Re-think the siloed approach

The Government needs to move away from the current CDR sector specific approach which is cumbersome and slow.

Under this model, consultation for each designated data sector is narrowly focussed to key providers within each sector. The opportunities to leverage the data made available through CDR is much more likely to be realised from providers outside of these sectors.

Additionally, the need to develop sector specific frameworks and infrastructure is structurally inefficient and does not enable simple reuse across each new sector.

Simply, Government needs to rethink the CDR model to enable design and delivery to occur across multiple-sectors simultaneously.

### Build a common CDR framework

GATE would encourage the creation of a common framework that supports the delivery of CDR across the economy. Such an approach would in essence create the building blocks that could then be used by each sector to implement CDR increasing the pace of the roll-out.

In our experience, the successful design and delivery of key large scale, cross-sector reforms have had the following in common:

- Principles-based policy development
- Simple legislative framework that can be extensible through regulations to specific sectors
- Overarching governance framework that can be supported by specific purpose groups
- Government involvement led by a combination of policy agency (e.g. Treasury) and delivery agency (e.g. ATO)
- Industry involvement led by a broad cross section of stakeholders
  - Advisory
  - Policy and law
  - Technical delivery
  - Implementation
  - Specific sub-groups (Sector specific)

Such an approach would enable policy/legal, governance, technical, administrative and accreditation approaches to be developed that would frame guidance and requirements for the application of CDR across sectors.

A common approach would also make it easier to participate in multiple sectors and avoid the potential for over-regulation of data holders, ADRs and intermediaries.

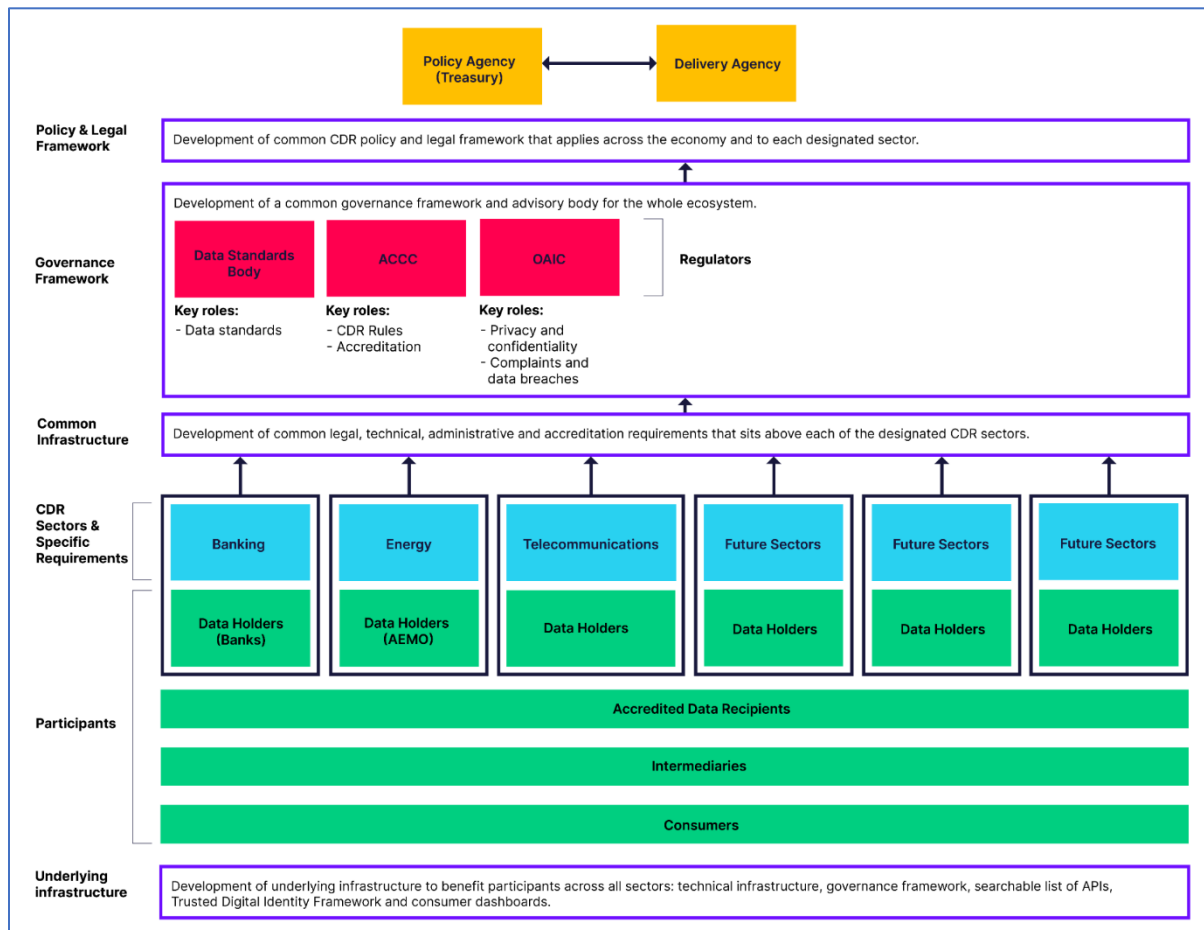
## Implement common CDR infrastructure

The above approach should be supported by the development of common underlying assets and infrastructure that could be leveraged by different sectors and across data sets.

Such assets could include:

- A common Governance framework that is extensible to each new sector
- Development of common technical infrastructure
  - data harmonisation
  - data format
  - API structure
- Central dashboards and consent management for consumers
- Trusted Digital Identity Framework (TDIF) can be leveraged by all participants
- Centralised listing of all CDR APIs (regardless of sector)
- Adoption of common industry security standards such as the ATO's DSP Operational Security Framework

This approach would create consistency across the CDR ecosystem while also lowering the barrier to participation and increasing the opportunity for innovative software providers to develop new services that benefit consumers. Further, it would make it much easier for both CDR participants and end-consumers.



## Engage with GATE

GATE and our member organisations would welcome further engagement from Treasury to detail our previous experience in delivering on government digital reforms and where we consider there are opportunities to improve the overarching implementation approach for CDR.

Regards,

A handwritten signature in black ink, appearing to read 'C Denney', written in a cursive style.

**Chris Denney**

**Director, GATE (Gateway and Transaction Exchange)**

**Head of Strategy, SuperChoice**