



## ABA response to DP-183

The proposed solution put forward in DP-183 refers to a principle of 'Purpose-based consent'. Purpose Based Consents are a way to encode all of the required dimensions and granularity for a specific use case. Unfortunately, this specificity leads to a consequent loss in flexibility. DP-183 highlights read-only use cases which are not currently covered; however, the same principles and requirements are even stronger to enable read-write access.

Taking the example of the Tax Return, DP-183 specifies a number of dimensions that would be sufficient for a Consumer to consent, and for a Bank to identify and return that data as a one-time request. This is the equivalent of creating a specific printed consent form.

However, that same Consumer would need a new Purpose Based Consent to be defined in order to repeat the request for the following year, and every year after. To extend the analogy, 'Tax Return 2021' would require a new form which is different from 'Tax Return 2020' and may have different items on it that a Consumer would need to be aware of. There is a risk that trying to centralise all possible use cases restricts potential innovation by participants, and in fact reduces the levels of visibility and control that consumers have over their data.

The alternative, multi-dimensional fine-grained consent is more similar to providing a mechanism to select appropriate options for printing out a consent form, which provides full control and visibility to both Consumer and CDR participant.

Consumers experience with fine-grained consent can be more easily managed within CX guidelines. The main point is that without adopting fine-grained consent within a dynamic structure, the underlying technology will not support wider and evolving use cases, including payments.

The proposal which is purpose-based consents may simplify the consumer experience, but it will require new purpose definitions for EACH purpose and will not allow innovative expansion of use-cases.

The current approach being suggested by Decision Proposal 183 implies the DSB is will represent every possible combination and dimension of access into static scope representations. The ABA seeks clarity on this interpretation.

The ABA recommends instead that the DSB consider adopting RAR as a generic mechanism for enabling multi-dimensional fine-grained consent to be requested and instead focus efforts onto the standardization of the dimensions of data access that the CDR wishes to enable within an Australian RAR envelope.

For further detail, we refer readers to the ABA's submission on DP 182 – InfoSec Uplift for Write (to be published 23-July).

GitHub link to consultation: <https://github.com/ConsumerDataStandardsAustralia/standards/issues/183>

GitHub link to comment:

<https://github.com/ConsumerDataStandardsAustralia/standards/issues/183#issuecomment-884740999>