



## Method

- Anonymous public survey run for a 3-week period from 16 August 2021
- 12 non-mandatory questions –7 Likert scale, 3 open-ended and 2 opinion-based
- Sent to private email list of 102 contacts in Australian financial services industry
- Link to survey published on LinkedIn post that received 2,326 views, 41 reactions and 14 comments
- Promoted at weekly CDR Thursday implementation call
- Referenced on Consumer Data Standards CDR Support Portal

<https://cdr-support.zendesk.com/hc/en-us/community/posts/4405177178895-Measuring-CDR-Success-Short-Survey>

[https://www.linkedin.com/posts/halerob\\_cdr-consumerdataright-activity-6832841726709907456-N1V1](https://www.linkedin.com/posts/halerob_cdr-consumerdataright-activity-6832841726709907456-N1V1)

## Responses

- 48 responses received, very high completion rate on questions
- Wide variance in time to complete from 3m:28s to 44m:45s - two sessions indicated > 5 hrs
- Ignoring outliers, median time to complete was 9m:33s

## Author's Opinion

- People appear to have thought carefully about their responses
- I recognise that the results come with an inherent bias due to the way the questions were posed
- These responses should be viewed as indicative

## Terminology

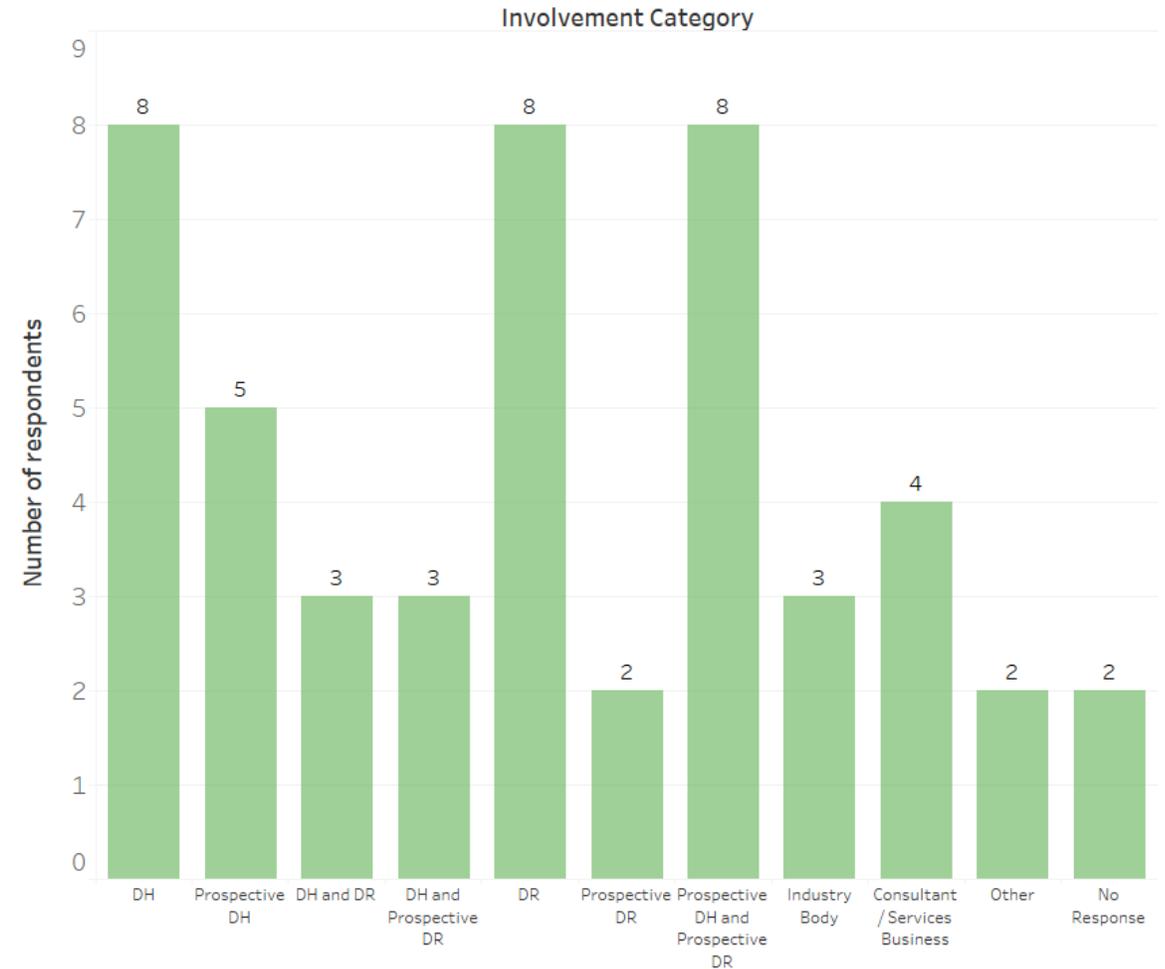
- The following abbreviations have been used throughout the results
  - DH (Data Holder), DR (Data Recipient), ADR (Accredited Data Recipient)

# Q1 – Level of **Involvement** in CDR

This helps understand the perspective you have when responding to the survey

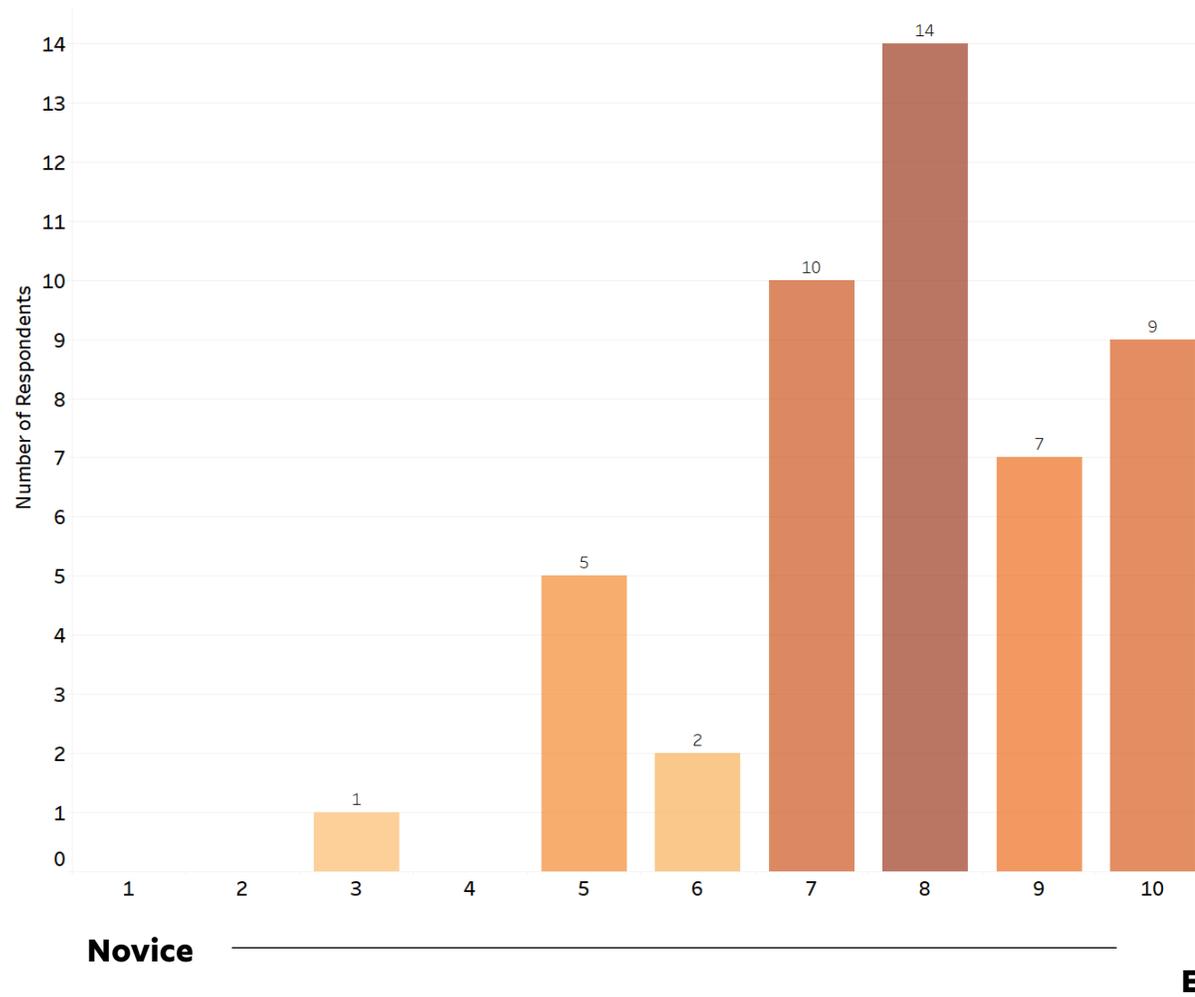
**46 responses (95.8%)**

DH 8	Prospective DH 5	Consultant / Services Business 4	
DR 8	DH and DR 3	DH and Prospective DR 3	Industry Body 3
Prospective DH and Prospective DR 8	No Response 2		Prospective DR 2
	Other 2		



**Survey Observations:** Good representation from a range of stakeholders, not overly skewed towards any one particular interest

## Q2 – Current Knowledge Level of CDR



How would you classify your awareness and knowledge of CDR today?

**48 responses (100%)**

### Statistics

Range 3-10

Average CDR Knowledge = 7.81

Median = 8

### Survey Observations:

Respondents appear knowledgeable and have a good understanding of CDR issues. The feedback is therefore likely to be informed and of value

# Q3 – Possible Measures of Success

How helpful would these measures be in determining success?  
**48 responses (100%)**

Strongly Disagree Disagree Neutral Agree Strongly Agree

The number and % of all DH brands active on the register

The number and % of all DH brands publishing compliant data

The number of consumer consent attempts made (success/fail overall)

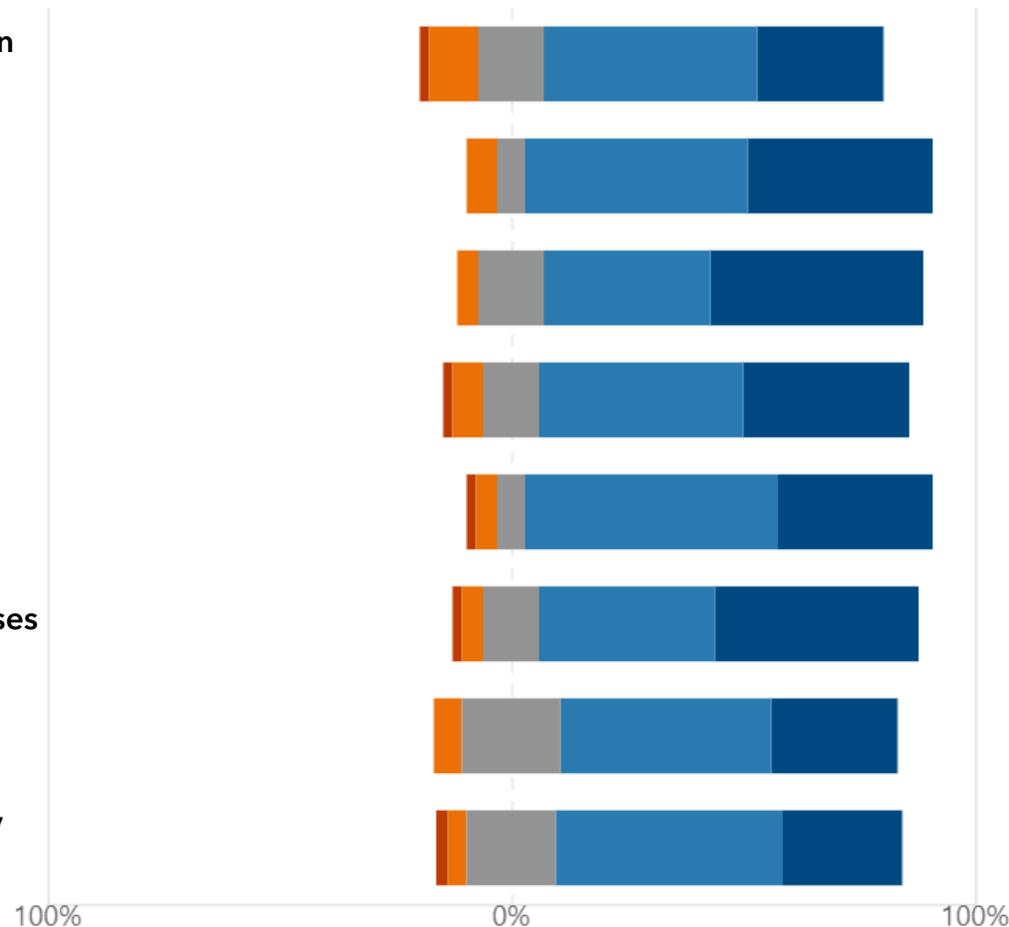
The number of ADR API calls made (success/fail) overall

The number of ADRs Active on the register

The number of published Active ADR use cases

The number of one-time consents per day (rolling 7 day avg)

The number of time-bound consents per day (rolling 7 day avg)



**Survey Observations:**  
Responses largely indicate support for all these measures

# Q4 – Other Possible Measures

9 respondents (36%) answered **consumer** for this question.



## General Ecosystem

- Consider short, medium and longer-term metrics
- Number of products or services created through CDR
- Growth / accumulation usage measures over time
- Blend of intermediaries / ADIs, non-ADIs and other roles
- Consistency of data across sectors
- Ratio of existing fintechs using screen-scraping v migration to CDR
- Accredited partners / sponsors and how many ADRs they service
- Unique consumers per ADR – not just thousands of calls with same consumer
- Number of CDR-founded businesses
- DH data quality
- ADR pipeline

## Consumer Experience

- Time to complete consent, consent drop-off and pass/fail rates
- Withdrawal of consents - elapsed time after initial consent
- How many customers are sharing data and for how long?
- CDR experiences with 4\* or 5\* app store reviews
- Meaningful life outcomes achieved

What other possible measures might be useful in determining CDR success?

**26 responses (54.2%), 786 words**

## Consumer

- Customer feedback, NPS, dispute count, ease of use and satisfaction
- How much do consumers trust individual ADRs and DHs?
- Usage level and satisfaction by type of use case – and over time
- Benefit / Value added to consumer – \$ savings, time savings
- Number of home loans originated using CDR affordability assessments
- Number of customers per bank using CDR
- Active use cases by category

## Technical and Performance

- CTS v live environment gaps
- Benchmark response times of DH and ADR
- ADI v non-ADI DH stats analysis
- Compare performance of newly active DHs v existing DHs
- DH data quality and technical compliance rates
- % Compliant payload responses by DH
- Level of tech support required for bug fix and deployment
- Regulatory compliance
- Stability of technical requirements – days since last change
- Information security / unauthorised access complaints

## Suggestions

- Recognise UK learnings to accelerate process

# Q5 – Customer Participation

16 respondents (50%) answered **consumers** for this question.



## General Ecosystem

- Proportion of the customer base that has access to CDR by sector
- % of population with at least one consent request per year
- CDR access on behalf of ineligible citizens
- Size of CDR adoption by potential market, national, state, postcode
- Percentage of ADRs that are also DHs
- Coverage of Australian bank accounts able to use CDR

## Technical and Performance

- Device types used by consumers
- Use of CDR data or derived data

## Suggestions

- Grant Program for NFPs to bring social outcome use cases to life

CDR should be accessible to all Australians, so what metrics could help determine if this is the case? Consider consumer eligibility, digital inclusion, access to Internet-connected devices and other issues that could impact participation

**33 responses (68.8%), 845 words**

## Consumer

- Number of customers changing banks
- Attempt by DHs and ADRs to engage with consumers and offer choice of CDR
- Consumer Education, DHs asking customers if they would like to know more
- Level of digital literacy and comprehension of how CDR can help
- Demographics of consumers accessing CDR
- Volumes by ADR and product category to identify consumer demand
- Satisfaction with level of control consumers have over their data
- Determine if non-digitally-connected people are missing out
- Monitoring of pricing for consumer services adopted using CDR
- Willingness of participation and propensity to share data
- Which use cases help rural or vulnerable Australians

## Consumer Experience

- Customer survey of awareness, use cases and use
- CDR Brand awareness
- Time windows when CDR consents, withdrawals and requests are made
- Consent withdrawal method – DH /ADR dashboard or other means
- Analyse complaints data using AI to assess themes

# Q6 – Data Recipient Participation

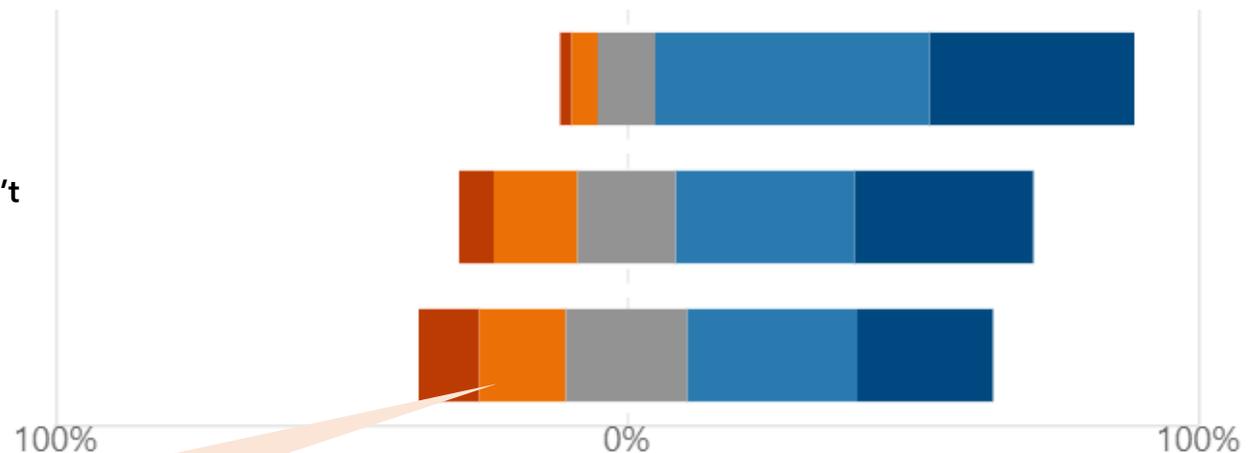
How much do you agree with these statements?  
**48 responses (100%)**

Strongly Disagree Disagree Neutral Agree Strongly Agree

It's important to recognise the number of accredited DRs and track growth of that number

Accredited DRs without a published software product aren't really participants yet so we should differentiate here

ADRs should be responsible for identifying and reporting DH conformance issues



## Survey Observations:

25% of respondents do not agree that ADRs should be responsible for identifying and reporting DH conformance issues. This sentiment was expressed by both DHs and DRs

# Q7 – Data Holder Participation

How much do you agree with these statements?  
**48 responses (100%)**

Strongly Disagree Disagree Neutral Agree Strongly Agree

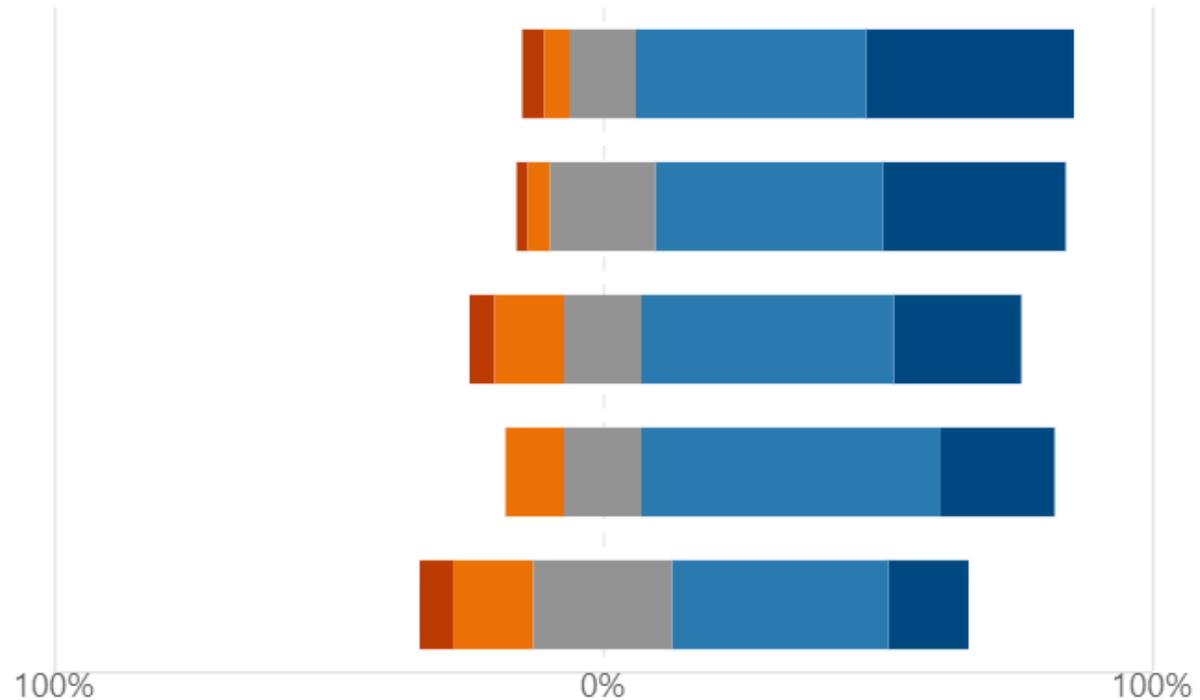
Full DH participation should be a major focus, only having some DHs active is an issue

DH API technical standards compliance is important, only when 100% proven should we onboard DHs

DH published data quality is important, only when 100% proven should we onboard DHs

Having DH endpoints that are accurate but slow, still provides some value

We should accept that DH endpoint issues will always exist and set our expectations accordingly



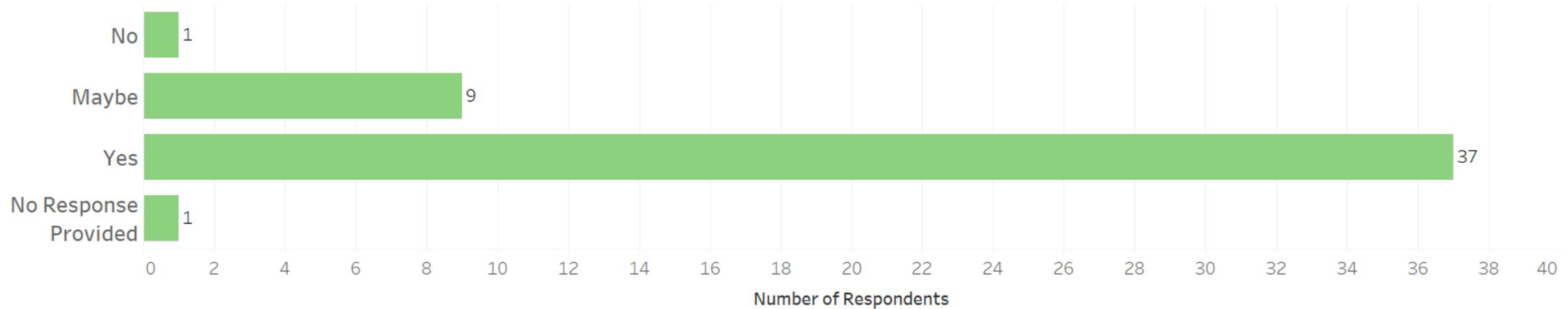
## Survey Observations:

There is some tolerance for non-conformance, but the majority of respondents expect DHs to be publishing conformant, quality data. Slow data seems better than poor quality data

## Q8 – Conformance Test Suite

DHs currently need to pass the CTS in order to become active on the register.  
Do you think the quality of the CTS might impact overall CDR success?

**47 responses (97.9%)**



### Survey Observations:

79% of respondents say that the quality of the CTS might impact overall CDR success. Only 2% believe this not to be the case

# Q9 – CTS and Onboarding Metrics

How much do you agree with these statements?

**47 responses (97.9%)**

## Survey Observations:

Only 11% of respondents believe the current CTS is adequate and effective as an onboarding tool for DHs. 47% disagree or strongly disagree with this statement.

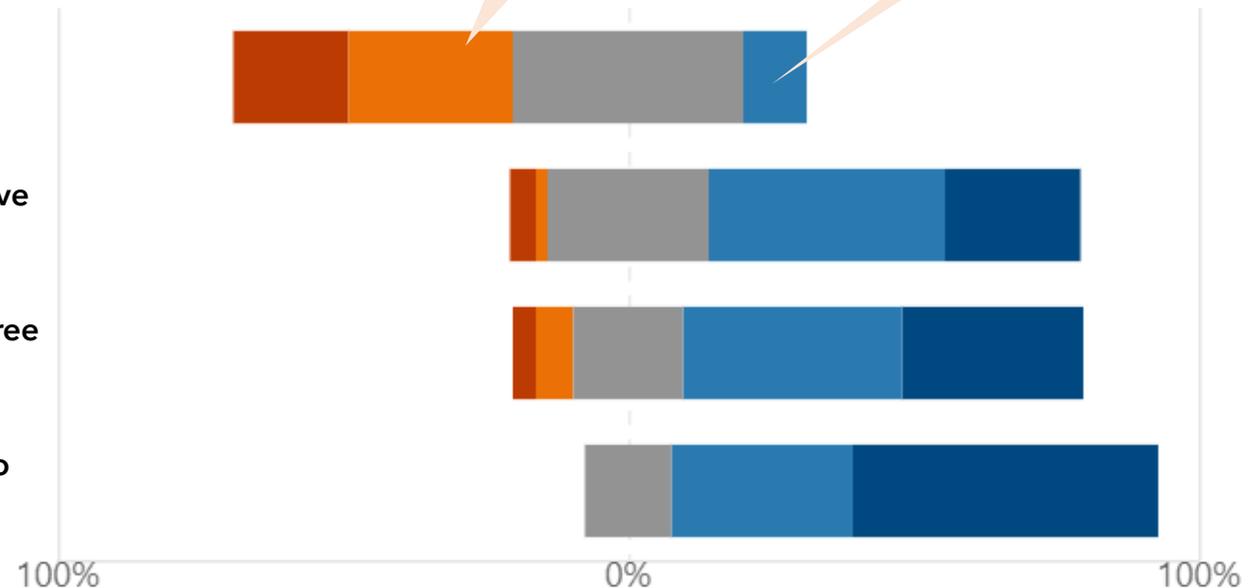
Strongly Disagree Disagree Neutral Agree Strongly Agree

The current CTS is adequate and effective as an onboarding tool for DHs

The CTS should be more rigorous and comprehensive for DHs

Once DHs pass the CTS we should have a high degree of confidence in their conformance

A pre-production environment with staged access to production would help improve DH conformance



# Q10 – Publication of Data Holder Performance Metrics

How public should DH performance metrics like these be?

**47 responses (97.9%)**

■ Not Made Available ■ Made Available to ACCC / TSY ■ Made Available to all participants ■ Made Publicly Available ■ Not Sure

DH endpoint success / failure rates overall

DH endpoint success / failure rates by DH

DH API availability % overall

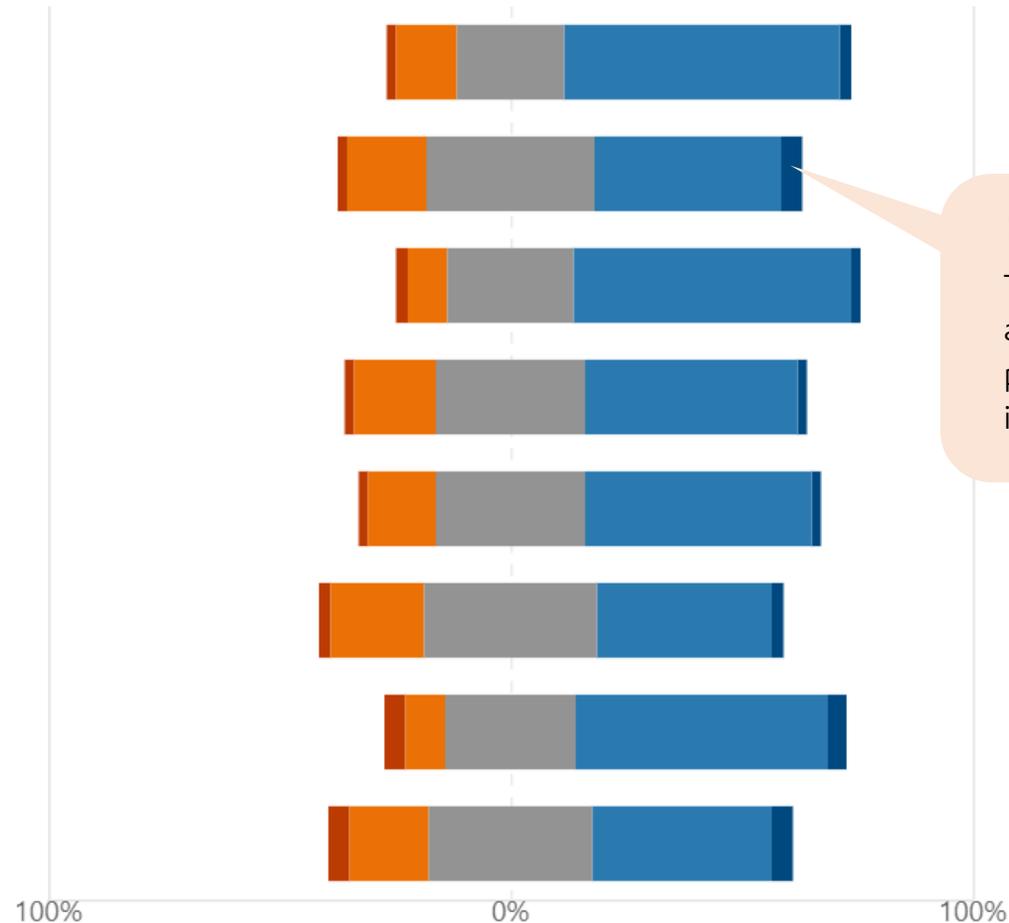
DH API availability % by DH

DH endpoint latency overall

DH endpoint latency by DH

Consent success/ failure rates overall

Consent success / failure rates by DH



## Survey Observations:

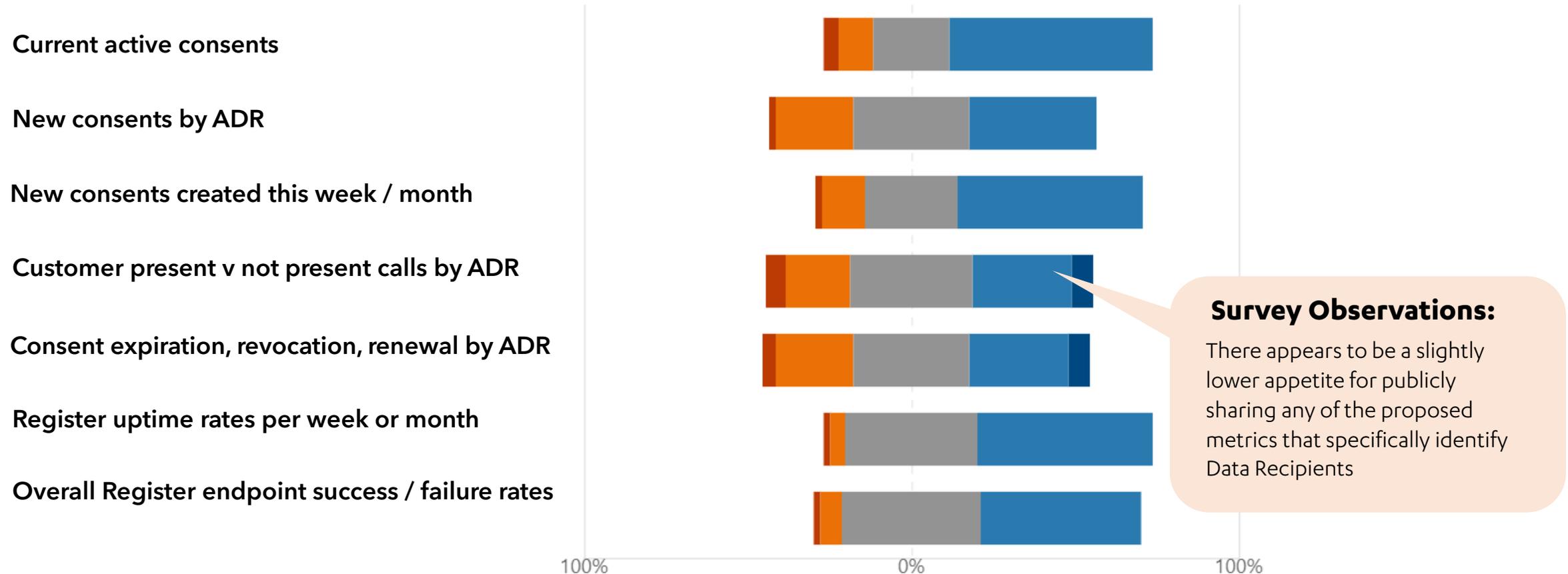
There appears to be a slightly lower appetite for publicly sharing any of the proposed metrics that specifically identify Data Holders

# Q11 – Publication of **Other** Performance Metrics

How public should other performance metrics be?

**47 responses (97.9%)**

■ Not Made Available ■ Made Available to ACCC / TSY ■ Made Available to all participants ■ Made Publicly Available ■ Not Sure



**Survey Observations:**  
There appears to be a slightly lower appetite for publicly sharing any of the proposed metrics that specifically identify Data Recipients

# Q12 – Final Thoughts

9 respondents (56%) answered CDR for this question.



Thank you for sharing your thoughts. Is there anything else you'd like to add?  
**17 responses (35.4%), 995 words**

## Technical and Performance

Deviation from technical or industry standards

## General Ecosystem

Ease of onboarding for DHs and DRs

Metrics on results of further provision of CDR data to unaccredited entities

## Suggestions

Delegate CTS security profile compliance to OI DF

Sandbox for testing applications to help startups and small-scale testing

Provide more support for Tier 2 and Tier 3 ADIs

Address imbalance between data protection obligation of DHs and CTS breadth

Consider the ability of future generations to access services from verifiable sources

Broader stakeholders should define a tangible and compelling vision for CDR

Be cautious about damaging consumer trust when publicising technical issues

Revisit parts of this survey when more DHs and/or ADRs are active

Can't emphasise enough the importance of a stringent accurate DH barrier to entry

Openness is important for adoption, I hope more public metrics will be provided

## Observations

Consumers will not put in effort to use CDR unless compelled to do so

Sharing data with accountants will streamline BAS and tax return interactions

Ongoing cost and time impact is significant on smaller FIs

Embrace the challenge of defining what it is we value and measure that

CDR is an opportunity to lead in the most crucial digital infrastructure for our society

Integrating data from legacy systems is challenging

Sharing legacy integration stories from complex environments will help other

participants with planning, support and defect fixing and to maintain compliance

DR Accreditation doesn't matter – Active DR Accreditation should be the top priority