

Issues

- 1. Disclosure consent: ADR to ADR
- 2. Disclosure consent: Insight disclosure to non-accredited person

Objectives

Disclosure consent: ADR to ADR

- 1. Understand if the ADR to ADR flow is comprehensible
- 2. Understand mental model (control over datasets in disclosure consent, flow of data, points of control e.g. dashboard, redundant data handling)
- 3. Understand perception against original consent flow
- 4. Understand expectations around who to go to when things go wrong
- 5. Understand if and how trustworthiness and propensity to willingly share are impacted by ADR to ADR disclosure consents, for the process and CDR in general

Disclosure consent: Insight disclosure to non-accredited person

- 1. Understand if the insight disclosure flow is comprehensible (flow of data, points of control, redundant data handling).
- 2. Understand mental model (control over datasets in disclosure consent, flow of data, points of control e.g. dashboard, redundant data handling)
- 3. Understand if consumers comprehend that they are disclosing data to non-accredited persons
- 4. Understand if consumers comprehend what an 'insight' refers to
- 5. Understand perception against original consent flow
- 6. Understand expectations around who to go to when things go wrong
- 7. Understand if and how trustworthiness and propensity to willingly share are impacted by non-AP insight disclosure consents, for the process and CDR in general

General

- 1. Understand if consumers comprehend the differences between consent types
- 2. Understand consumer sentiment towards the differing levels of regulation and protections between consents

Participants

Proposed requirements:

- Mix of age, gender, location
- Explicitly aim to include people with non-English speaking backgrounds
- Explicitly aim to include people with a range of accessibility needs
- Mix of consumer adoption types

Other details:

- 50% participants who were previously engaged in research
- Prioritise participants with insurance and/or loan products

Background

New rules [are being proposed](#) to allow for a greater number and type of businesses to participate in the Consumer Data Right (CDR). This includes the introduction of 'Disclosure Consents', which is proposing to allow consumers to consent to disclose their CDR data and/or insights derived from CDR data to another Accredited Data Recipient (ADR), a Trusted Advisor (TA, e.g. lawyers, accountants, mortgage brokers etc.), and non-Accredited Persons (Non-AP, who can only receive CDR insights).

These processes are expected to differ to original consents established between ADRs and Data Holders (DH).

Where a consumer consents to disclose their data from one ADR to another ADR, differences may include a non-CDR authentication process (e.g. requesting usernames and passwords), as well as a modification to where and how consents exist, including where data is flowing to and from, and where controls exist to manage those consents. Both ADRs will be required to comply with all existing ADR obligations.

Where a consumer consents to disclose CDR insights from an ADR to a non-AP, differences may include that the non-AP is not accredited or regulated under the CDR, and as such may not be required to comply with various consumer protections, including how data is used by that non-AP and disclosed to other parties. As such, no authentication process will be required and the non-AP will not need be subject to dashboard requirements, time-limited use of CDR insight data, and other requirements that consumers may expect an ADR to comply with.

Where a consumer consents to disclose their CDR data from an ADR to a TA, the consumer must nominate this entity before the data is disclosed, but otherwise TAs are not required to comply with any CDR-related requirements, similar to how a non-AP will operate.

The proposed v2 rules and consultation paper state that ADRs must comply with any CX standards and must have regard to CX guidelines, and suggest that 'standards or guidelines may incorporate, for example, warnings that the non-accredited person may not be subject to the Privacy Act 1988'.

CX research will be conducted to explore how the above scenarios can operate in a way that is intuitive, informed, and trustworthy, which will in turn inform the development of any CX Standards or CX Guidelines.

The next round of research will focus on ADR to ADR disclosure consents, and insight disclosure consents to non-APs. TA Disclosures will be touched on but not investigated in detail.

Approach

- Dates: Nov 9-13
- 10 participants, 1-on-1 sessions, 1.5hr
- Interview, prototype 1, survey 1, prototype 2, survey 2
- ADR to ADR disclosure + Insights disclosure
- Use cases:
 - ADR to ADR: Data wallet to research platform
 - ADR to non-AP: Data wallet to insurance offer

Questions and Hypotheses

Disclosure consent: ADR to ADR

- 1. How do participants expect ADR to ADR disclosure consents to work?
- 2. How and where do participants expect to exercise control over data sharing?
- 3. How do various consent metrics - such as trustworthiness, propensity to willingly share, and perceived benefit - perform for ADR to ADR disclosure consents compared to original consents?
- 4. How does an alternative authentication model impact the experience?

Hunch 1: Participants expect ADR to ADR disclosure consent to work similarly to the existing consent experience, including where and how control is exercised

Hunch 2: Participants expect the existing CDR authentication model for ADR to ADR authentication

Disclosure consent: non-AP insight disclosure

- 1. How do participants expect non-AP insight disclosure consents to work?
- 2. How and where do participants expect to exercise control over data sharing?
- 3. How do various consent metrics - such as trustworthiness, propensity to willingly share, and perceived benefit - perform for non-AP insight disclosure consents compared to original consents?
- 4. What information do participants expect to see before disclosing insights to non-APs?
- 5. Do consumers understand that CDR protections will not apply when disclosing insights to non-APs?
- 6. What level of detail do participants expect to see in relation to the insight? A generic description or specific details?

Hunch 1: Participants expect non-AP insight disclosure to work similarly to the existing consent experience

Hunch 2: Participants expect to see more information about the non-AP and what protections do and do not apply for non-AP insight disclosures

Hunch 3: Participants expect to see more detail about the actual insights and how the insights will be used

Hunch 4: Participants expect to be told about and/or given recourse options if they have issues with the non-AP

General

- 1. Do participants understand the differences between consent types?
- 2. Do participants understand that different consents have regulations and protections? How do participants respond to these differences?