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To: [Consumer Data Rights Data61](#)
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Subject: Westpac feedback on Consumer Data Right | Consultation Draft - consent management and revocation
Date: Thursday, 22 August 2019 8:06:54 PM
Attachments: [image001.png](#)

To the Consumer Data Standards CX Workstream at Data61,

We at Westpac thank you for the opportunity to provide feedback on the Consumer Experience (CX) Workstream's consent management and revocation flows. Based on the limited time available for feedback we have collated the following in relation to the flows:

- We note that only limited consideration has been given to joint accounts particularly around issues such as the delegation of access, display of pending consents and other issues.
- The revocation consumer journey seems unnecessarily complicated in the presented prototypes on page 12. Customers are presented with very similar information across multiple confirmation screens. We would suggest that a single confirmation screen is adequate for a 'stop sharing' process, and that the information presented is streamlined. For example, it is probably unnecessary to repeat the data clusters after confirmation as the customer has just reviewed this (twice). Although the recommendation in Guideline 5.3 are intended for data recipients, we remark that data holders do not receive impact to service information necessary for a similar screen.
- Initially, we suggest favouring comprehensibility over flexibility with regard to consent management. This is because, initially, engagement and familiarity with consent management dashboards and the number of consents that need to be managed by each user are all likely to be low. In particular, Guideline 1.5 might risk creating excess complexity for customers at the start of the regime.
- Recommendations should focus on underlying principles rather than particular CX patterns. For example, Guideline 2.1 should recommend that users be able to easily return to a previous view, rather than suggest the use of back buttons. This will help to ensure that recommendations are device agnostic, and that experiences are consistent for customers in relation to their other interactions with the holder or recipient.
- There is currently not a technical way to allow data holders to display purpose or frequency of access information as for example in the 'How your data is used' screen on page 8.

Thank you,

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