Why does the Consumer Experience Workstream exist?

For those who already recognise the value of human-centred design this is a no-brainer for the consumer data right. But the need for the Consumer Experience - or CX - Workstream was in part triggered by our learnings from UK Open Banking.

When UK Open Banking launched there was a clear consumer experience gap - there was inconsistency and unnecessary friction because different open banking participants were doing wildly different things to each other.

To address this, UK Open Banking built in CX as a standard that was as integral as security and technical standards. This formed the basis for the CX Workstream in Australia.

Ultimately the CX Workstream's purpose is *'to help organisations provide CDR consumers with simple, informed, and trustworthy data sharing experiences.'*

We strive to achieve this through a variety of activities but the key outputs are the CX Standards and CX Guidelines.

CX Standards and Guidelines don't just help create a more consistent and trustworthy ecosystem for consumers, they also lower the barriers for organisations to participate in the regime by helping them understand how to participate.

But taking a step back, and this is even more fundamental, it's through the CX Workstream that we conduct consumer research to test the rules and standards so they are developed in a way that is centred on consumer concerns, behaviours, and expectations.

So while CX Standards and Guidelines are the core of our work, we also go above and beyond to help make the CDR a trustworthy ecosystem that consumers will adopt because it benefits them to do so in the short and long term. That's what will make the CDR a success.

What is the scope of the CX Workstream?

The CX Workstream looks at many aspects of the CDR including consent, privacy, and trust, but ultimately our scope is what has been termed the Consent Model.

'Consent Model' refers to:
- The Consent Flow
        - Which includes consent, authentication, and authorisation
- Consent Management
        - Which can occur on dashboards provided by data holders and data recipients
- Withdrawal of consent, which can also occur on those dashboards
- And various aspects relating to this Consent Model such as data language and notifications

Why not leave the consumer experience to the competitive space?

We saw the result of this in the UK where there was huge divergence in how things were first implemented, and that raised the need for consistency to be provided with CX Guidelines. While we do create standards for critical components, so much of what we do is demonstrate ways to put the rules and data standards into effect that have been tested with consumers and have been informed through community consultation.

The CDR Rules have an expectation that the CX Guidelines be used at a minimum to guide implementation. The CX Guidelines aren't mandatory, but they are benchmarks that organisations can and should improve on where appropriate to facilitate informed consent, give people control of their data, and to help people realise the benefits - and risks - of data sharing.

What is the difference between a CDR Rule, CX Standard and CX Guideline?

CDR Rule

A Consumer Data Right Rule that **MUST** be followed. These Rules are created by the ACCC and are referenced throughout the CX Guidelines. Along with these rules, the guidelines also include visual interpretations of how these Rules could be implemented.

CX Standard

A Data Standard that **MUST** be followed. These items will be binding data standards for the purposes of Consumer Data Right Act and in accordance with the Consumer Data Right rules made by the ACCC.

The CX Standards include requirements for:
- The obtaining and withdrawal of consents and authorisations
- The collection and use of CDR data
- The authentication of CDR consumers
- The types and descriptions of CDR data for collection and disclosure

CX Guideline

A guideline that **SHOULD** be followed.

It is stated in the August 2019 CDR Rules Explanatory Statement that accredited persons follow by the languages and processes found in guidelines produced by the Data Standards Body.

Since these Guidelines are based on stakeholder consultation, heuristic evaluation, and CX Research findings, it is strongly advised that these guidelines should be followed unless there is a valid reason to ignore it.

How prescriptive are the CX Guidelines?

There are different requirement levels outlined in the CX Guidelines. When the Guidelines say:
- **MUST**: it means an absolute requirement
- **MUST NOT**: it means an absolute prohibition
- **SHOULD**: means it is strongly advised but there may be valid reasons to ignore this particular item. However, CDR participants should understand full implications before choosing a different course.
- **SHOULD NOT**: also means it is strongly advised, but there may be valid reasons when the particular item is acceptable or even useful. Full implications also need to be understood before implementing any item described with this label.
- **MAY**: means that this is an informed suggestion but that the item is optional.

Steps within the Consent Flow and the Withdrawal process are mandatory unless stated otherwise. The steps before and after the Consent Flow are optional but strongly recommended.

The screens and components shown in the CX Guidelines are only visual examples of how the CDR Rules, CX Standards and Guidelines can be implemented.

Won't the requirements for consent cause cognitive overload and consent fatigue?

The consent requirements are robust but how consumers engage with them - or not - will depend on the use case and how participants implement consent.

The level of detail required when a data recipient is seeking consent depends on a number of factors such as:
- how the data recipient intends to use that data
- how redundant data is handled
- how much data is requested
- and how the data recipient and data holder chooses to display this information.

More detail and interaction is generally required if:
- multiple uses are requested;
- the data recipient does not have a general policy of deleting redundant data;
- the data recipient is requesting extensive data; and
- as a result of the above points, the data recipient requires additional elections and accompanying descriptions

The CDR encourages transparency - if organisations are requesting lots of data for myriad uses, and will handle that data in opaque ways, then this will make consent complex. If an

organisation is minimising the data it needs, is being specific as to purpose, and isn't going to use or keep that data for any longer than it needs to, then it becomes much simpler.

And in addition to this, organisations don't have to present blocks of text. Get creative, use visual aids, use micro-interactions and nudges to encourage people to engage with the material meaningfully so they can be informed.

Consent is tricky and this will be quite the learning curve for consumers and organisations. We want to trigger a behaviour change on both sides - encourage people to be more data conscious and encourage organisations to handle data with a conscience. For organisations the goal is to facilitate comprehension and help people be informed and in control. How you do that above and beyond the standards and guidelines is up to you, so long as you're doing it.