



Beautiful business

Tuesday 11 February 2020

Via email: ACCC-CDR@acc.gov.au

Dear Sir or Madam

Consultation on how best to facilitate participation of third party service providers

Xero welcomes the opportunity to further engage with the Australian Competition and Consumer Commission (ACCC) with the aim to facilitate participation of third party service providers within the Consumer Data Right (CDR) scheme.

We commend the ACCC on its approach to the development of the CDR rules framework which we have found well considered, transparent and constructive.

Third parties will be crucial service providers in the CDR and open banking ecosystem. However, it will be essential to ensure that third party regulation is not complex or cumbersome, and flexible enough to ensure compliance is possible without overly burdensome business costs. Overly complex regulation will mean there will be few competitors, and will minimise the pro-competitive and consumer impacts of the CDR reforms.

In short, the barriers to entry for participation in the CDR scheme should be as high as necessary to protect consumers but as low and streamlined as possible to ensure the practical success of the CDR reforms.

About Xero

Xero is a beautiful, intelligent platform built to help small businesses and their advisors grow and thrive. Born in the cloud, Xero connects businesses with the accounting tools, apps and thousands of data points business owners need in one place, available at any time, on any device.

Since our founding in 2006, Xero has become one of the fastest growing software-as-a-service companies globally. We lead the New Zealand, Australian, and United Kingdom cloud accounting markets, and have an emerging presence in North America and Asia. Today, Xero has over 2 million subscribers.

Data has always been at the core of our ability to deliver benefits to our customers. Born as a single accounting ledger in the cloud, Xero was the first in the industry to build an open API to connect into the software businesses use daily, from inventory and logistics to point of sale and customer experience.

Xero Australia Pty Ltd
ABN 89 124 215 247

Registered Office
1/6 Elizabeth Street
Hawthorn
VIC 3122

www.xero.com
0800 GET XERO
T +64 4 819 4800
F +64 4 819 4801
E info@xero.com



Through secure, direct data feeds with banks and enterprise suppliers our customers can streamline bank reconciliations, expense management, and cash flow visibility. This makes it easier for small businesses to work with their closest ally — their accountant, bookkeeper or advisor. Whether it's doing taxes, getting the books in order, or setting out the business growth strategy, Xero brings the data and information into one place, quickly and easily, so advisors can do what they do best.

Xero also offers secure API connections to over 800 cloud business applications (apps) in the Xero marketplace, helping our small business customers to pass and receive data to and from their service providers. These apps can assist with invoice management, cash flow forecasting, payroll and inventory management, through to using accounting data to assess credit.

Xero's data driven platform helps solve some of the greatest challenges for small businesses such as visibility of their financial situation, getting paid faster and gaining better access to affordable lending. It also helps drive growth by simplifying tasks like employee rostering and invoicing.

Research from Xero's [2018 Digital Connectivity report](#) found Australian small businesses connected to at least one app enjoyed revenue growth 1.9 percent higher and employment growth 2.2 percent higher than businesses without connected apps.

How Xero currently uses and shares data

Upon setting up a Xero subscription, customers proactively connect 'bank feeds', which allows daily transaction data to be viewed and added to by the subscriber, to transform CDR data to accounting data from within a Xero subscription.

Accounting data is created by customers (and customers' systems) reconciling financial transaction data with other proprietary data. For example, a customer will reconcile:

- multiple invoice lines against a single transaction,
- tax component against a single transaction, and
- wage, PAYG and superannuation information against a single transaction.

Customer transaction reconciliation vastly increases the value of pure CDR data through the addition of multiple data points.

Accounting data created within Xero is hyper-accurate compliance data, which forms the backbone of activities including BAS statements and tax returns. As the economy becomes more digitised we anticipate accounting data will continue to become less manual, further increasing its accuracy, utility and value.

Coding near real time transactions creates an up to date general ledger (and other reports), underpinned by accounting data, shareable upon consent with trusted advisers. Around 85 percent



of small business customers connect their accountant or bookkeeper to their Xero account to perform an array of tasks based on the level of access granted.

After bank feeds are set up, a customer typically instructs Xero or a third party to automate bill collection and begins invoicing from within Xero. These functions give complete oversight of business costs and revenue, providing a customer with a real time view of bills owed, outstanding invoices and overall cash position.

A customer may next decide to leverage the services of a third party app by integrating it with their Xero account upon consent. Customers with the appropriate authority level give consent to connect third parties to their account either from the Xero App Marketplace, or directly through the app to be integrated.

How Xero would use and share data within the CDR scheme

Assuming the CDR scheme is workable and efficient, Xero intends to transition its existing mechanism for receipt of permissioned financial data on behalf of customers to the CDR scheme. The major change to Xero's 'bank feed' data facilitation as a result of operating under the CDR scheme will be the method of receiving data, switching from a bilateral batch to a CDR API.

We envisage under the CDR regime Xero will consume a range of CDR data while third parties in our app ecosystem will consume accounting data, following customer consent. A use case example is Xero consuming open banking (CDR) data while facilitating permissioned third party access to a customer's accounting data (upon consent) to provide a cash flow forecasting service.

All in all, we believe the data Xero will receive under the CDR scheme will be equivalent in nature to existing bilateral arrangements, though not identical. The responsibility and opportunity for customers to transform their financial data to accounting data will remain the same under the CDR scheme. We are optimistic the quality of data and coverage of authorised data holders (ADHs) and their products under the CDR will be highly advantageous for customers over time.

Differential treatment of Intermediaries and third parties

In Xero's view there should be differentiation in how Intermediaries and third parties are regulated. Whilst it is appropriate for a level of CDR related accreditation to apply to Intermediaries (aligned with existing frameworks as explored below), in Xero's view existing best practice third party governance structures should be respected and recognised.

Xero does not anticipate disclosing pure CDR data to third parties and therefore does not expect to be classified as an intermediary. Rather, we will continue to disclose materially enhanced accounting data to third parties accredited under existing, best practice governance frameworks.



However, currently a consumer is free to export their banking data to a spreadsheet and email it to a third party of their choice. Were an explicit regulatory framework to be introduced for third party CDR recipients, it would unnecessarily create cost and complexity barriers that do not exist elsewhere in permissioned transfers of consumer data. There is no evidence that additional regulation of third party data recipients is needed. Particularly in light of the fact that the Privacy Act and other governance structures developed upon need will continue to apply.

Value in leveraging appropriate existing frameworks

In Xero's view, it would be highly advantageous for the CDR scheme to recognise, leverage and align with appropriate existing frameworks by extending the streamlined accreditation opportunities currently available only to Authorised Deposit-taking Institutions (ADIs).

Recognising existing, comparable frameworks by extending fast-tracked accreditation would create an efficient scheme that supports broad participation in the CDR and full attainment of its potential consumer benefits.

Key existing comparable frameworks include the Australian Taxation Office (ATO) Digital Service Provider (DSP) Operational Framework, the related Security Standard for Add-on Marketplaces (SSAM) and Tax and BAS agent requirements.

Xero submits the ACCC recognise and provide streamlined accreditation pathways to reflect:

- The ATO's DSP accreditation as equivalent to unrestricted CDR ADR status.
- The SSAM accreditation as equivalent to third party accreditation under the CDR.
- Tax and BAS agent accreditation as equivalent to third party accreditation under the CDR.

It would be pertinent for the ACCC to offer each of the above tiers streamlined accreditation pathways to fast-track CDR regime participation to minimise disruption of existing secure data transfer processes.

ATO DSP/SSAM Operational Framework

In the 2016-17 financial year, the ATO collaborated with industry to develop the DSP Operational Framework. This framework sets out the minimum technical and security requirements software developers and their products are expected to meet if they wish to consume ATO services and data via API or from within software.

The DSP Operational Framework requirements include internationally recognised compliance standards including the International Organisation for Standardisation (ISO) and SOC 2, developed by the American Institute of Certified Public Accountants (CPA). These accreditations are recognised, interoperable and considered global best practice.



All DSPs wanting to consume the ATO's digital services need to meet the requirements which can include, but are not limited to:

- Authentication
- Encryption
- Supply chain visibility
- Certification
- Data hosting
- Personnel security
- Encryption key management
- Security monitoring practices.

Further information on the full suite of DSP requirements is available at:

<https://softwaredevelopers.ato.gov.au/RequirementsforDSPs>

As of October 2019, more than 250 software developers and taxation, accounting, payroll and superannuation software products have been reviewed, accredited and certified by the ATO under the DSP Operational Framework.

In 2019, the ATO further engaged with industry to codesign the world-first Security Standard for Add-on Marketplaces (SSAM). The SSAM is likely to be adopted by other Commonwealth jurisdictions within the next 24 months.

The SSAM framework sets out the minimum recommended security and certification requirements for cloud software products (apps) that integrate via API with software products governed by the DSP Operational Framework.

Requirements for third party apps participating in add-on marketplaces to gain SSAM accreditation include:

- Ensure effective key management is implemented to protect client data.
- Ensure that sensitive client data in the app is protected during the transport process.
- Ensure that users who access to the app are authenticated.
- Ensure that unauthorised third-parties are unable to access customer data.
- Ensure that the app server is secure.
- Ensure that the app is secure against the common vulnerabilities.
- Ensure that sensitive client data in the app is protected while at rest.
- Ensure appropriate audit logging functionality is implemented and maintained.
- Ensure client data is not hosted in high risk areas
- Ensure security monitoring practices are in place to detect and manage threats.

Full information for SSAM security requirements third parties can be viewed on the Australian Business Software Industry Association website:



<https://www.absia.asn.au/industry-standards/addon-security-standard/ABSIA-Security-Standard-f-or-Add-on-Marketplaces.pdf>

Tax and BAS agents:

For an accountant or bookkeeper to become a registered BAS or Tax Agent they must be a member of the Tax Practitioners Board (TPB). Requirements for registration include:

- Each director or individual partner must be at least 18 years of age.
- Each director or individual partner must be a fit and proper person.
- The company or partnership must maintain, or be able to maintain once registered, professional indemnity (PI) insurance that meets TPB requirements.
- The company or partnership must have a sufficient number of registered individual tax agents to provide tax agent services and supervision on behalf of the entity.
- The company must not be under external administration.
- The company must not have been convicted of a serious offence involving fraud or dishonesty during the previous five years.

If there is a company partner in the partnership:

- each director of the company partner must be at least 18 years of age
- each director of the company partner must be a fit and proper person
- the company partner must not be under external administration
- the company partner must not have been convicted of a serious taxation offence or an offence involving fraud or dishonesty during the previous five years.

Full information is available from the Tax Practitioner Board website:

<https://www.tpb.gov.au/register-company-or-partnership-tax-agent>

The SSAM, the DSP Operational Framework and Tax and BAS agent requirements enact a tiered, standardised accreditation process based on risk and is a pragmatic solution to manage customer security in an environment of connected parties.

Xero submits that the ACCC should review the ATO's DSP Operational Framework, SSAM framework and evaluate regulated entities (such as Tax and BAS agents) for the purposes of streamlined, unrestricted CDR Accreditation, Intermediary accreditation and non-accredited third party status. It would create efficiencies and drive uptake of the CDR - and hence broader economic benefit - if, to the extent appropriate, organisations could use their approved DSP/SSAM and Tax and BAS agent status to be evaluated for CDR purposes.

It would similarly be preferable for the CDR scheme to align to the greatest extent possible with existing frameworks such as the ATO's DSP/SSAM frameworks and Tax and BAS agent frameworks. This is likely to significantly increase CDR participation by reducing the cost of doing business and avoiding the creation of unnecessary red tape for providers who operate within



multiple governance frameworks. It would support smaller organisations to participate in the CDR scheme as it will reduce the need to undergo multiple accreditation processes.

If organisations were faced with inconsistent accreditation processes, the cost of participating in numerous schemes would become prohibitive. Multiple inconsistent schemes would exponentially increase barriers to entry of cost, complexity and capital requirements that will in turn reduce competition between service providers, and potentially the overall benefit to consumers of the CDR scheme.

Inconsistent governance schemes may also lead to organisations needing to establish technological 'workarounds'. We might see organisations continue to operate outside the CDR scheme, for example through direct consents, multiple APIs and screen scraping. This would mean Australia loses out on the opportunity to “encourage new business models to unlock the value of consumer data” (see the Government’s [Response](#) to the Productivity Commission’s report).

A key finding of the Productivity Commission’s [report](#) into Data Availability and Use was that “improved data access and use can enable new products and services that transform everyday life, drive efficiency and safety, create productivity gains and allow better decision making.” The aspects of the CDR scheme relevant to intermediaries, are critical to realising these opportunities, including improved outcomes for consumers and small businesses.

Responses to the Consultation Questions

Consultation questions: intermediaries

1. If you intend to be an intermediary in the CDR regime, or intend to use an intermediary, please provide a description of the goods or services you intend to provide to accredited persons or to CDR consumers using an intermediary. Do you intend (or intend to use an intermediary) to only collect CDR data, or collect and use CDR data? What value or economic efficiencies do you consider that intermediaries can bring to the CDR regime and for consumers?

As described above, Xero currently intends to be a consumer of intermediary services. Xero will likely gain access to multiple ADH CDR APIs through a single API facilitated by an intermediary.

Depending on the definition of intermediary, Xero’s accounting data sharing facilitation (as described on page 2) may trigger consideration of Xero as an intermediary. Xero’s position is that we should not be considered an intermediary, because we will not pass CDR Data through to third parties as a technology service provider will. Instead, Xero anticipates that we will facilitate the sharing of materially enhanced accounting data, which is highly transformed CDR data. Certainty



around which entities will be considered intermediaries is important to manage unintended consequences, as explored in two case studies below.

The treatment and definition of intermediaries and third parties will in part determine whether it is feasible and viable for Xero to migrate its customers and cloud business application (app) ecosystem to the CDR scheme. The alternative is to continue operating our proven, secure, bilateral data transfers to keep delivering the benefits of customer data enhancement and control external to the CDR scheme.

As outlined above, we encourage the greatest alignment possible with existing frameworks for unrestricted ADRs, intermediaries and third parties, such as the ATO's DSP/SSAM frameworks. The regulatory burden for intermediaries in particular will materially impact the barrier to entry for intermediaries, ADRs and third parties, determining participation, and in turn consumer outcomes.

Accessible intermediary services will allow more organisations to participate in the CDR scheme by lowering the investment required to participate and enabling competition among third party service providers.

It has been indicated that Xero may be considered an intermediary because accounting data may be classified as CDR Data as opposed to materially enhanced data. However, should this be the case under the CDR rules, a series of unintended consequences with far reaching ramifications may emerge.

1. ATO & government agencies

If accounting data is considered CDR data or derived CDR data, the same information collected by the ATO through business activity statements and tax returns would likewise be CDR Data. Xero would require consent from the customer to provide the ATO with data, and other agencies consuming Xero accounting data.

Similarly, should accounting data be considered CDR Data the ATO would also be required to seek customer consent for additional uses of CDR data such as benchmarking, segmentation, anti-money laundering and counter terrorism purposes.

In addition, the ATO would be required to seek accreditation as an intermediary, as it discloses accounting data to other agencies, including Department of Human Services, the Australian Bureau of Statistics and Treasury among many others. Should any of the recipients of CDR Data seek to use data for other purposes, consent from the customer would be required to be sought.

It would be tempting for the Government to seek a carve-out to exempt it from CDR responsibilities. However, a carve out would create the basis for a deeply anti-competitive regime, especially as CDR is extended to other sectors of the economy, including energy.



Liquidators

Currently, where a liquidator is appointed over a company whose information is held in a Xero subscription, it is common for the liquidator to contact Xero directly and request electronic access to that Xero subscription. This is on the basis that:

- the information in the Xero subscription is the books and records of the company and
- the liquidator has a statutory right to access those books and records, under the Corporations Act 2001.

If accounting data is considered to be CDR data then in some circumstances Xero may be prohibited from providing a liquidator with access to the Xero subscription of the applicable company in liquidation, unless the liquidator is an accredited data recipient. This scenario may place Xero in a position in which it is unable to fulfil its statutory obligations to the liquidator.

2. How should intermediaries be provided for in the rules? In your response please provide your views on whether the rules should adopt either an outsourcing model or an accreditation model, or both and, if so, and in what circumstances each model should apply.

As per Xero's response to question one, the definition of 'intermediary' needs to be defined. The definition should limit the term to entities transferring pure CDR data. Disclosure of materially enhanced information, which Xero considers accounting data to be, upon consent should not be considered an intermediary service. This reflects the intent of the ADI designation instrument, which excludes "information significantly more valuable than the source material" from specified classes of information. Therefore, Xero's transfer of accounting data upon consent is one of non-CDR data, relieving it of an intermediary classification.

Xero considers the provision for intermediaries in the CDR rules should include outsourced and accreditation models, and the flexibility to accommodate intermediary business models commensurate to individual risk characteristics.

Adopting both models would align the CDR with the UK's Open Banking initiative rules for intermediary-equivalent technical service providers (TSPs) and Account Information Service Providers (AISPs).

Where an intermediary provides CDR information or services to ADRs and/or end users, Xero considers it appropriate for it to be accredited independent from its ADR partner, mirroring AISP



requirements in the UK model. In our view, aligning the CDR to accepted global standards is good practice enabling interoperability.

3. What obligations should apply to intermediaries? For example, you may wish to provide comment on: a. if intermediaries are regulated under an accreditation model, the criteria for accreditation and whether they should be the same or different to the criteria that apply to the current 'unrestricted' level, and the extent to which intermediaries should be responsible for complying with the existing rules or data standards; b. if intermediaries are regulated under an outsourcing model, the extent to which contractual obligations should be regulated between accredited persons and intermediaries; c. if the obligations should differ depending on the nature of the service being provided by the intermediary.

Xero has engaged OpenWrks to provide it intermediary services in the UK, where it is registered with the Financial Conduct Authority (FCA) as an AISP, equivalent to accreditation model compliance. Xero is assessing the engagement of an intermediary to facilitate the collection of CDR data in Australia. It is our understanding and expectation our intermediary will seek unrestricted accreditation to participate as an intermediary and an ADR independent from Xero's unrestricted ADR accreditation.

We expect our intermediary to receive an accreditation commensurate to the risk characteristics of its practices. Flexibility is not possible under the current draft accreditation guidelines. However, flexibility would boost intermediary participation, increasing competition among ADRs and consumer outcomes.

Further, Xero submits the ACCC should consider existing, risk commensurate accreditation frameworks to grant streamlined intermediary accreditation pathways, namely the ATO DSP/SSAM Operational Framework. The DSP/SSAM Operational Framework allows for tiered accreditation to ensure the regulatory burden is appropriate to protect consumers without thwarting participation and competition.

4. How should the use of intermediaries be made transparent to consumers? For example, you may wish to comment on requirements relating to consumer notification and consent.

Ultimately, it is appropriate for a customer/small business to provide consent for the release of CDR data. How this release occurs, should be detailed in information underpinning that consent, as opposed to being subject to a standalone consent, as the latter would be likely to create confusion and the unintended consequence of less informed consent.



Xero believes the UK Open Banking initiative's customer notification requirements regarding intermediaries work well. This includes a page on an ADR website providing an overview of external service providers and an outline of the role played by them to facilitate the service. Xero seeks for this to be linked in the consent wording for each integration and conveyed in plain English.

5. How should the rules permit the disclosure of CDR data between accredited persons? For example, you may wish to comment on requirements relating to consumer consent, notification and deletion of redundant data, as well as any rules or data standards that should be met.

The definition of "between accredited persons" needs further clarification to determine the nature of disclosure. For example, Xero's relationship with its intermediary should not be considered a transfer of CDR data "between accredited persons" due to the facilitatory nature of the arrangement. The ATO's DSP/SSAM Framework may provide some guidance in this area. The SSAM framework sets a consistent set of data standards for third parties.

It is important to note that the Privacy Act will continue to apply to personal information transferred, and the CDR scheme should not create a separate, potentially conflicting and confusing, set of obligations.

6. Should the creation of rules for intermediaries also facilitate lower tiers of accreditation? If so, how should the criteria and obligations of new tiers of accreditation differ from the current 'unrestricted' accreditation level, and what is the appropriate liability framework where an accredited intermediary is used?

Xero supports flexibility in the scheme and recognition of existing accreditation to fast-track participation for ADRs, intermediaries and third parties. We would point to the ATO's DSP/SSAM Framework as a good example of how this tiering and flexibility can be achieved.

It is important to keep top of mind that the Privacy Act will continue to apply to personal information that is held/used by organisations and those protections are not supplanted by the CDR scheme. Hence it's entirely appropriate that an organisation has a level of accreditation appropriate to risk characteristics.

Lower tiers of accreditation will facilitate higher participation, new business models and greater consumer outcomes.



Consultation questions: permitting CDR data to be disclosed to non-accredited third parties

7. If the ACCC amends the rules to allow disclosure from accredited persons to nonaccredited third parties and you intend to: a. receive CDR data as a non-accredited third party, please explain the goods or services you intend to provide, the purposes for which you propose to receive CDR data, and how this may benefit consumers; b. be an accredited person who discloses CDR data to non-accredited third parties, please explain the intended goods or services you intend to provide and how they may benefit consumers.

Xero suggests streamlined, unrestricted ADR accreditation pathways under the CDR scheme be extended to entities with DSP status under the ATO DSP Operational Framework. As the ACCC acknowledges in its consultation paper, “there are existing mechanisms that facilitate the transfer of data from consumers to third parties”. Xero provides such a service at present, securely connecting over 800,000 small business subscribers with their banks, their advisers and third party service providers in our ecosystem.

Xero intends to continue to help customers solve problems by facilitating permissioned third party access to accounting data under the CDR scheme. Xero does not consider this a disclosure of CDR data, rather it is disclosure of materially enhanced accounting data upon customer consent.

Xero plans to continue facilitating the customer ability and opportunity to transform financial data to accounting data by combining CDR data with proprietary data. And, continue the ability for accounting data to be securely shared upon consent to third parties who are covered by an accreditation framework, and in line with customer intent. Xero will continue to ensure the customer maintains control of their data at all times, freely able to amend access in line with requirement.

8. What types of non-accredited third parties should be permitted to receive CDR data? Why is it appropriate for those types of third parties to be able to receive CDR data without being accredited?

Consumers and small businesses should be empowered to provide consent/direction for their data to be shared with organisations of their choice. The Privacy Act will continue to apply as appropriate.

Xero will not disclose pure CDR data to third parties. Xero will however disclose materially enhanced accounting data to third parties in our ecosystem who are covered by an accreditation framework, following customer consent.



Third party apps receiving accounting data are governed by the industry's SSAM framework while other third party recipients of data, such as accountants and bookkeepers, are governed by the TPB rules and the Tax Agent Services Act. Therefore, every third party that receives accounting data following customer consent within Xero's ecosystem (and the ecosystems of our competitors) is covered by an accreditation framework.

Xero submits the ACCC assess the DSP Operational Framework, the SSAM and TPB Tax and BAS agent rules for tiered, best practice accreditation of third parties, which is capable of managing different business models and risk characteristics.

Further, Xero submits the ACCC offer streamlined accreditation pathways for entities holding existing accreditation under these frameworks to fast-track participation and consumer outcomes.

9. What privacy and consumer protections should apply where CDR data will be disclosed by an accredited person to a non-accredited third party?

First, it is important to be wary of the use of the term 'non-accredited' given it refers *only* to non-accreditation under the CDR scheme. As outlined above, there are other frameworks under which third parties may be accredited, including the ATO's DSP/SSAM frameworks and TPB rules.

Second, it is appropriate that the Privacy Act continues to govern personal information across the economy. We note the Privacy Act is about to undergo a detailed review following the Government's response to the ACCC's Digital Platforms Inquiry. We believe this economy-wide approach to assessing the appropriate privacy protections for Australians will avoid any unintended consequences from a piecemeal consideration of the issues.

Third, the ACCC must recognise existing disclosure of accounting data to third parties is not disclosure of pure CDR data. Existing transfers are regulated end-to-end through the best practice ATO DSP Operational Framework, SSAM and TPB rules. Interfering in existing accounting data disclosure risks significant unintended consequences and will contribute to Xero's decision to participate in the CDR regime.

10. What degree of transparency for CDR consumers should be required where an accredited person discloses CDR data to a non-accredited third party? For example, are there particular consent and notification obligations that should apply?



Beautiful business

First and foremost, notice and consent regarding personal information should continue to be governed by the Privacy Act and the CDR scheme should not create conflicting, confusing, alternative standards.

It is appropriate that control of CDR data resides with the relevant person, unless explicitly delegated to a third party. For example, in Xero's experience, a significant number of small businesses outsource data responsibility to their accountant or bookkeeper to organise bank feeds and integration with third parties. This is a system small businesses are comfortable with which often leads to a more efficient and productive business.

Thank you for the opportunity to contribute to the facilitating participation of intermediaries in the CDR regime consultation. I look forward to engaging further with the ACCC to develop a regime with high participation and positive consumer outcomes.

Kind regards

Ian Boyd
Xero Financial Industry Director