



# Data quality in the Consumer Data Right

**Findings from stakeholder consultation**

5 April 2023

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# Glossary

<b>ACCC</b>	Australian Competition and Consumer Commission
<b>Accredited data recipients</b>	Persons accredited to receive consumer data
<b>Act</b>	<i>Competition and Consumer Act 2010</i>
<b>CDR</b>	Consumer Data Right
<b>Data holders</b>	Organisations designated to share CDR data
<b>DSB</b>	Data Standards Body
<b>Incident Management, Data Quality and Ecosystem Performance working group</b>	A working group on issues in the CDR related to the relevant topics. To attend please email <a href="mailto:CDRTechnicalOperations@accc.gov.au">CDRTechnicalOperations@accc.gov.au</a> .
<b>OAIC</b>	Office of the Australian Information Commissioner
<b>Product reference data</b>	Information about publicly available products
<b>CDR Rules/Rules</b>	<i>Competition and Consumer (Consumer Data Right) Rules 2020</i>
<b>Service Management Portal (Portal)</b>	Portal through which participants can raise incidents
<b>Standards</b>	Consumer Data Standards made by the Data Standards Chair
<b>Treasury</b>	Department of the Treasury

# Executive summary

The Consumer Data Right (CDR) improves consumer choice, control, and convenience by enabling access to data organisations hold about consumers and products. For the CDR to be effective it is critical that CDR data is good quality. This includes product reference data as well as consumer data.

The CDR regime requires data holders to take reasonable steps to ensure the data they disclose through the CDR is correct.

In the period since the CDR commenced, the ACCC has focused on data holders' compliance with their data sharing obligations, including in relation to the quality of CDR data. This includes publishing guidance, monitoring obligations to make product reference data available, managing technical incidents between participants, and investigating complaints about data quality.

In overseeing these matters, it should be noted that the ACCC cannot view consumer data directly. Concerns about consumer data quality are therefore typically brought to our attention through reports from participants.

As CDR uptake grows, the impact of data quality issues becomes increasingly important. In October 2022, the ACCC published a [discussion paper](#) on CDR data quality compliance. In addition, we held bilateral meetings with various stakeholders. The engagement was constructive with feedback provided on the extent, including frequency and impact, of data quality issues.

This paper outlines the ACCC's findings from the consultation process and actions we intend to take to address the issues raised.

The key findings include:

1. The quality of consumer data is generally sufficient to support the delivery of CDR products and services, although improvements are required.
2. There are significant shortcomings in the quality of product reference data.
3. Data recipients and users of product reference data have raised concerns over the responsiveness of data holders when data quality issues have been raised with them.
4. There is scope to clarify the nature of data quality obligations to ensure a better understanding of expectations around appropriate data quality.
5. Regulators should be prepared to take a stronger regulatory approach to improve data quality.

Through the consultation process, it is apparent that there are a number of factors that impact CDR data quality, and there is no single solution to improving it. Issues raised include:

- Data quality is a multi-faceted concept, with data quality relevant to a range of obligations in the CDR framework. Good quality data can be relied on to deliver useful CDR products and services to consumers when the data is accurate, up-to-date, complete, and in the required format.
- Different data quality issues will require different regulatory – and possibly policy – responses. In some cases, compliance or enforcement action is appropriate, while in

other instances, further guidance or amendments to rules or standards can improve data quality.

- The current quality of product reference data is of particular concern. It appears to be the key factor hindering the use of product data for comparison services.
- The sharing of consumer data is currently supporting CDR services that are providing value to consumers. However, consumer data quality issues do arise and can impact the delivery of some services. The extent of impact depends on the use case and the nature of the issue.
- For some accredited data recipients, consumer data quality is not a primary concern. However, others have indicated that inadequate data quality may be inhibiting new products and services from being developed.
- Complexity in data holder systems (for example, the interaction of legacy and new systems) further increases the challenge of implementing CDR obligations. Implementing new CDR functionality ahead of addressing operational issues as they arise can affect the time it takes to resolve data quality issues.
- Many data recipients and product data users find that once they raise data quality issues with data holders, they frequently encounter difficulties receiving a satisfactory response and resolution to concerns raised.

Recognising the importance of the issue, the ACCC and the Office of the Australian Information Commissioner (OAIC) are treating data quality as a priority area for compliance and enforcement activities.

CDR participants must comply with their obligations. In particular, the ACCC expects data holders to regularly review the efficacy of their CDR solutions and address any outstanding data quality incidents as a priority. In the short term, the ACCC's CDR compliance and enforcement efforts will be focussed on regulatory action for data quality issues involving:

- the provision of incorrect interest rates
- missing data
- the use of free text fields where a relevant structured field exists
- data that is not commensurate with what a consumer can otherwise see in their online or mobile banking channels.

There is no single solution for improving data quality in the CDR. Instead, the necessary response will need to encompass a combination of:

- clear regulatory obligations
- effective guidance
- constructive stakeholder engagement
- strong regulatory action
- an improved culture of compliance among participants.

# Summary of findings and actions

## **Finding 1 – The quality of consumer data is generally sufficient to support the delivery of CDR products and services, although improvements are required**

Accredited data recipients identified some instances of poor quality consumer data that effect the delivery of their services. The level of harm caused depended on the data quality issue and the use case. Other data recipients noted that data quality issues were less prevalent as a concern compared to other issues including difficulties with consent completions. Many noted that consumer data quality had improved over the period since the CDR commenced.

## **Finding 2 – There are significant shortcomings in the quality of product reference data**

A large number of data quality concerns were reported in relation to product reference data. Inadequate data quality is hindering reliable product comparison.

## **Finding 3 – Data recipients have raised concerns over the responsiveness of data holders when data quality issues have been raised with them**

Many data recipients are finding it difficult to receive a satisfactory and timely response to data quality issues once raised with data holders. This is particularly the case for those data recipients who use product reference data. The Service Management Portal provides a mechanism for data recipients to raise data quality issues relating to consumer data with data holders, however, timeliness of responses varies.

Product reference data users lack a specific channel through which to raise issues with data holders. Where issues are raised directly with data holders they often receive no response.

## **Finding 4 – There is scope to clarify the nature of data quality obligations to ensure a better understanding of expectations around appropriate data quality**

Stakeholders attribute the term 'data quality' to a range of issues and some stakeholders interpret data quality related obligations differently. More clarity on obligations, supported by clearer guidance, should improve understanding of the requirements around data quality.

## **Finding 5 – Regulators should be prepared to take a stronger regulatory approach to improve data quality**

Stakeholders emphasised the benefit of increased regulatory actions by the ACCC and CDR co-regulator, the OAIC, on data quality issues. Such an approach would send a clear message about the importance of complying with data quality obligations.

The ACCC's proposed actions in response to these findings are outlined below.

### ***Action 1 - Ensure a strong regulatory presence and response on data quality issues***

The ACCC will:

- increase its enforcement activities to address data quality non-compliance. Our focus will be on data holders' compliance in relation to a number of specific issues including:
  - incorrect interest rates in product reference data
  - information shared in free text fields, rather than relevant structured fields
  - missing or incomplete data
  - instances where data provided is not commensurate with what a consumer can otherwise see in their online or mobile banking channels
  - instances where there are slow or insufficient responses to data quality issues.

### ***Action 2 – Provide further clarification and guidance on obligations relating to data quality***

The ACCC will:

- work with Treasury, the OAIC, and the Data Standards Body (DSB) to develop new guidance on data quality related obligations and to consider clarifications to particular data quality related obligations in the CDR framework
- where there is flexibility in implementation and this affects participant experience, consider options to improve participant experience, for example, publishing information about data holder implementations so that data recipients can develop use cases accordingly.

### ***Action 3 – Further engagement with stakeholders to improve processes***

The ACCC will:

- improve the Service Management Portal through which stakeholders can raise data quality issues. This may include implementing service level objectives to improve response times on tickets, and reviewing incident types and trends to ensure data quality incidents are appropriately tracked.
- consult with stakeholders on existing and new transparency measures to improve data quality compliance. This will include:
  - consulting with stakeholders on the CDR public rectification schedule and potential improvements to increase its effectiveness
  - considering publishing known issues with product reference data relating to individual data holders to promote compliance
  - working closely with participants and other CDR agencies to explore opportunities for a dedicated channel through which users of product reference data can raise issues with directly with data holders.

# Discussion

## Background

High quality data is crucial to the effective functioning of the CDR. The *Competition and Consumer Act 2010* (Cth), (**Act**) the *Competition and Consumer (Consumer Data Right) Rules 2020* (Cth) (**Rules**) and the Consumer Data Standards (**Standards**) set out requirements for the quality of CDR data.

The ACCC and the OAIC co-regulate the CDR in accordance with the *ACCC/OAIC Joint Compliance and Enforcement Policy*.<sup>1</sup> The OAIC regulates privacy aspects and can use a range of investigative and enforcement mechanisms under the Act and the *Privacy Act 1988* (Cth).

The ACCC also has a range of enforcement powers it can use to monitor and promote compliance with the CDR Rules.

Non-compliance with CDR obligations has the potential to adversely impact the delivery of products and services using CDR data, and therefore, CDR consumers and the broader reputation and integrity of the CDR ecosystem.

## Data quality in the CDR

'Data quality' is a concept that covers a range of CDR data holder obligations. Data quality in the CDR is relevant to both consumer data and product reference data.

- Product reference data is information about products a data holder offers publicly. In the banking sector, this includes home loans, savings accounts, and credit card products. Product reference data is available to anyone to access. Rule 4.13 requires data holders to provide a product data disclosure service. Rule 2.4(3) requires that data disclosed by this service must contain any information that is included on a website or in a product disclosure statement. The purpose of product reference data disclosure obligations is to improve the information available to potential customers of the relevant product.
- Consumer data is information relating to consumers and the use of products by consumers. In the banking sector, this includes transaction data, account balances, and specific interest rates. Only accredited persons may request this data with consent from the consumer. Rule 1.13(1)(b) of the CDR Rules requires that data holders provide an online service that enables consumer data requests to be made by accredited persons, enables data to be disclosed in a machine readable form, and that conforms with the data standards.

Privacy Safeguard 11 requires data holders and accredited data recipients to take reasonable steps to ensure that consumer data they disclose is, having regard to the purpose for which it is held, accurate, up to date, and complete.

Privacy Safeguard 13 deals with correction of CDR data, and the steps that must be taken in response to a consumer's correction request.

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<sup>1</sup> Available at: <https://www.cdr.gov.au/resources/guides/compliance-and-enforcement-policy>.



The Standards establish the structure of data disclosed under the CDR. For example, transaction date formats are common across data holders because the standards establish the fields and formats for sharing that information.

The Standards also include a 'data quality' non-functional requirement that applies to product reference data.<sup>2</sup> It states that if a data holder discloses product reference data, it must take reasonable steps to ensure the data is, having regard to the purpose for which it is held, accurate, up-to-date and complete.

Other obligations in the framework are also relevant to data quality. For example, in response to a valid request, data holders must disclose all 'required' data requested.

*A Compliance Guide for Data Holders in the Banking Sector* provides additional detail on the obligations on data holders arising under the rules and standards. This guide includes information on data quality obligations.

## **The ACCC's Compliance and Enforcement Role**

The ACCC has a number of roles in the CDR including the legislated roles of the Data Recipient Accreditor and the Accreditation Registrar. We also monitor and encourage compliance by CDR participants with the Rules, Standards, and the Act.

Since the CDR commenced on 1 July 2020, the ACCC's primary focus has been on reviewing data holder compliance with the data sharing obligations.

The ACCC and OAIC have a range of compliance monitoring tools, including monitoring and responding to stakeholder intelligence/complaints, business reporting, the ability to undertake audits and assessments, as well as the use of information requests and compulsory notices.

Where issues are raised, the ACCC and OAIC may take enforcement action. In deciding to take such action, we have regard to the factors outlined in the joint CDR Compliance and Enforcement Policy. Enforcement options include:

- accepting voluntary written commitments from a business
- accepting a court enforceable undertaking
- the ACCC issuing infringement notices with financial penalties
- the OAIC making a determination or declaration to substantiate a breach
- either the ACCC or OAIC initiating court proceedings in order to obtain an increased financial penalty or seek orders for a party to either perform or refrain from performing a particular action.

## **Product Reference Data**

The ACCC also monitors product reference data. The ACCC uses an automated schema validation to monitor conformance with the standards. To assess the accuracy of the data, staff also conduct manual reviews, comparing the information in product reference data to information published on a data holder's website. The ACCC raises issues it finds directly with data holders and may also use these tools in response to complaints from users.

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<sup>2</sup> Non-functional requirements are requirements that relate to the performance of the system rather than the core functional requirements that are necessary to support data sharing.

To date we have completed more than 100 such reviews and raised over 280 separate issues relating to data quality with data holders.

As is the case with consumer data matters, the ACCC can escalate product reference data issues with data holders through our CDR Under Assessment process for further investigation.

## Consumer Data

The ACCC's capacity to analyse consumer data quality is limited because this data is shared directly between CDR participants. We therefore rely on reports from third parties about material consumer data quality issues.

Accredited data recipients can raise incidents relating to consumer data sharing systems through the CDR Service Management Portal. This mechanism provides data recipients and data holders with a collaborative forum in which to resolve issues. The ACCC is able to monitor incident activity through the portal.

The ACCC may triage issues raised on the Service Management Portal through its CDR compliance and enforcement 'Under Assessment' process. This involves assessing the issue against the joint CDR Compliance and Enforcement Policy which includes considering the impact of the alleged conduct on consumers.

## Data quality consultation

On 28 October 2022, the ACCC published a data quality discussion paper that invited interested stakeholders to make written submissions by 21 November 2022 and to register their interest in bilateral meetings with the ACCC. The ACCC invited submissions on:

- the frequency of, issues arising from, and harm resulting from, data quality issues in the CDR
- approaches to address data quality issues from a compliance or enforcement perspective.

In total, 15 stakeholders from across the CDR engaged with the consultation – the ACCC received 12 written submissions and held 13 bilateral meetings between 7 November and 5 December 2022. Submissions were confidential, and this report makes anonymised references to the feedback. While the CDR is now live in the energy sector as well as banking, stakeholders that engaged spoke mostly of their experience sharing, or using, banking data.

## Discussion of Findings

### **Finding 1 – The quality of consumer data is generally sufficient to support the delivery of CDR products and services, although improvements are required**

Stakeholders noted that CDR data overall was of significant value and generally sufficient to support the delivery of CDR products and services. Data recipients are providing services to consumers, and many data holders have become accredited data recipients and are likewise developing use cases.

There has been continuing growth in the number of data recipients entering the CDR ecosystem, which suggests that the available data provides a basis for value-creating use cases to be developed. However, stakeholders reported that data quality issues are affecting the reliability of CDR data.

For example, data recipients reported instances of transaction descriptions in CDR not matching the descriptions shown to a consumer in their online or mobile banking channels. They also reported instances of some data holders failing to disclose around half of all consumer transactions that should be covered in the CDR data.

Some data recipients noted that product design can ameliorate the effect of known data quality issues. For example, if a data holder shares information in a format that is different to other data holders, a data recipient may be able to translate that data to ensure a consistent format. However, identifying and addressing these issues takes time and resources and places a burden on data recipients.

Data holders' provision of data of insufficient quality can also have a significant impact on the reputation of data recipients who attempt to use that data. Some data recipients reported that where poor data quality results in poor service, they may be subject to poor customer reviews, on the assumption the recipient caused the issue.

Some data recipients also noted that data quality issues can prevent the development of new use cases. Poor data quality may have greater consequences for certain use cases (such as loan assessments) than others (such as financial management apps).

Data recipients commented on the impact of poor data quality as compared with other issues encountered such as inadequate endpoint performance, consent 'drop-off' rates, and unfavourable incident resolution timeframes. Some consider these issues to have a greater impact on the CDR than shortcomings in data quality.

Some data holders who have become (or are intending to become) accredited as data recipients noted they have been unable to dedicate time and resources to developing use cases due to the scope of CDR obligations and the pace of change on the program's execution and expansion.

Data holders and recipients also provided different views on the frequency with which consumer data quality issues have been encountered. Many data holders acknowledged that there are some ongoing data quality issues, but noted that overall the number of data quality issues raised with them was relatively small.

Estimates of the frequency with which data quality issues arise vary among data recipients. Most agree that data quality issues vary across data holders – for example, a small subset of data holders have particularly severe data quality issues, while others have relatively good quality.

## **Finding 2 – There are significant shortcomings in the quality of product reference data**

Product data users raised many instances of poor data quality. This includes missing or incorrect data and non-conformance with the standards. According to users, the majority of data holders have at least some data quality issues present in their product data, with incorrect interest rates a particularly prevalent and high-impact issue.

Users noted the need for product reference data across all data holders to be good quality, as it offers the most value as a consistent and comparable data set. They noted that shortcomings in product reference data are making it difficult to use this data as a basis for a consumer-facing product or service.

For example, due to the scope of issues, one user is providing product reference data testing services to data holders, instead of focusing on a product comparator service to consumers. One individual reported they had signed up to a savings account based on a rate disclosed through CDR, only to find it was incorrect.

Some cases of poor data quality arise from non-compliance, particularly if data holders do not update product reference data in a timely way when terms and conditions of products change (for example, to reflect interest rate changes).

However, not all product reference data quality issues are the result of non-compliance. The reality is that most underlying products are not 'standardised', with banks designing and marketing their products in different ways.

The CDR does not require products to be standardised, but instead requires information on products to be shared in a standardised way. In certain cases, where there is flexibility in how a data holder can share product information under the Standards (to accommodate differences in products), the presented data may vary and this can be compliant. An example of this is data that can be shared in 'free text' fields. For example, most data groups provide data holders with the option to share 'additional information', which is data that does not have a specified structure and may include explanatory text.

## **Finding 3 – Data recipients and users have raised concerns over the responsiveness of Data Holders when data quality issues have been raised with them**

Data recipients have experienced issues when they raise incidents with data holders. The Service Management Portal provides a channel for data holders and recipients to identify and resolve consumer data issues including about data quality. Data recipients submitted they had experienced lengthy resolution times through the Service Management Portal.

Similar issues apply to consumers who make queries with data holders on CDR matters. Data recipients gave examples of their customers contacting data holders only to be told by frontline staff that data sharing is not possible.

Data holders, on the other hand, consider the complexity of CDR means investigating technical issues takes time. They provided information about their support practices and testing efforts to improve data quality and respond to incidents.

Product reference data users do not have access to the Portal because product reference data is publicly available, and therefore users are not authenticated and registered in the Registration and Accreditation Application Portal. Some contact data holders directly when issues arise or raise issues with the ACCC.

During the consultation process, a user gave the example of contacting a data holder after identifying incorrect interest rates. The user emailed the data holder through the email address provided on the public register – a generic ‘contact us’ address – and received no response. After the user reported this to the ACCC, the ACCC contacted the data holder who corrected the rates and made commitments to improve its product reference data quality.

#### **Finding 4 – There is scope to clarify the nature of data quality obligations to ensure a better understanding of expectations around appropriate data quality**

The consultation highlighted that defining ‘data quality’ is important, and that the concept can mean different things to different stakeholders.

Against that backdrop, there is merit progressing a better, shared understanding of its meaning in the CDR context. While a number of interrelated obligations apply to data quality (as discussed above), at a high-level, the framework requires that data holders disclose data that is accurate, up-to-date, complete, and in the required format.

Where relevant, CDR data should be commensurate with information provided to consumers through other channels, such as online or mobile banking.

Poor understanding by participants of data quality obligations, issues, and causes, can stand in the way of resolving issues. For example, participants may disagree about the interpretation of an obligation. There may also be a lack of clarity as to the information needed to investigate and resolve an issue.

Submissions indicated that changes to some CDR obligations may improve data quality. For example, some stakeholders are having difficulty complying with Privacy Safeguard 11 under the existing framework due to insufficient clarity about the way to share corrected data when requested to do so by a consumer.

A common issue raised by data recipients is that data holders may not be sharing data in ‘optional’ fields. In the standards, ‘optional’ refers to information that must be disclosed if it is held and relevant to a given consumer data request. This includes lending rates, transaction identifiers, or product fees. The categorisation of data as ‘optional’ in the standards indicates that a given field is not required in order to comply with the technical schema outlined in the standards. It is not an indication that data holders can elect not to disclose particular information if they have it. For example, lending rate fields are optional, because a given product (e.g. a basic transaction account) may not have any lending rates.

Data holders may not be providing this information even though they hold it and it is relevant to a particular data request. Data recipients and users of product reference data indicated that such missing data is having a high impact on the delivery of their CDR goods and services.

## **Finding 5 – Regulators should be prepared to take a stronger regulatory approach to improve data quality**

Data recipients and users of product reference data generally had a limited understanding of the ACCC's compliance and enforcement activities relating to data quality. They suggested there would be benefit from further communication about this work. For example, better communication about data quality issues known or brought to the attention of the ACCC may reduce time spent by users raising similar issues with data holders.

Some data recipients and product reference data users perceive there to be a lack of regulatory consequences for disclosing poor quality data for data holders, and that this is contributing to a poor CDR compliance culture. Some suggested that more frequent and larger financial penalties were required to improve data holders' approach to compliance.

While data holders spoke about their testing practices, they noted the limitations of testing, including that it does not guarantee a system's performance in production. Some data recipients raised the potential to use the ACCC's Conformance Test Suite to test data quality. The Conformance Test Suite gives the ACCC, in its capacity as Accreditation Registrar, a level of confidence that a data holder has implemented relevant security requirements and key endpoints and capabilities. However, the Conformance Test Suite does not validate whether a data holder is compliant with every standard.

Some stakeholders also suggested the ACCC should itself become accredited or otherwise be permitted to directly access CDR data to check its quality.

## **ACCC actions and next steps**

The consultation raised several issues that would benefit from increased regulatory activity from the CDR agencies, including possible enforcement action.

As outlined above, there are a range of complex and interrelated influences at play when it comes to the quality of CDR data. The appropriate response will depend on the specific issue encountered.

There will be instances where rules clarifications or guidance will assist, and other areas where stronger regulatory action will send a clear message to participants about data quality compliance. Resolving data quality issues at scale also requires collaboration between agencies and participants – as bilateral incident resolution between participants can supplement regulatory activities to improve data quality.

At this stage, the ACCC does not consider the CTS or accreditation is an appropriate way to assess and address data quality issues. Testing with real consumer data raises complex privacy and consent issues.

The ACCC considers that a combination of ongoing activities along with additional actions regarding data quality, as outlined in this paper, will improve quality, and address the problems identified through the consultation process.

The ACCC proposes to address the findings in this paper by:

- taking steps to increase its regulatory action relating to data quality
- working with participants and other agencies to clarify obligations relating to data quality

- engaging with stakeholders to improve processes that address data quality issues.

### ***Action 1 - Ensure a strong regulatory presence and response on data quality issues***

To increase its regulatory presence on data quality, the ACCC is treating data quality compliance as priority conduct for its compliance and enforcement activities. The next update to the joint CDR Compliance and Enforcement Policy will reflect this.

In the first instance, the ACCC will target key data quality issues that have emerged from our ongoing compliance activities as well as those raised through this consultation process, including:

- incorrect interest rates in product reference data
- information shared in free text fields rather than relevant structured fields
- missing or incomplete data
- instances where data provided is not commensurate with what a consumer can otherwise see in their online or mobile banking channels.

The ACCC will also focus on instances where there are slow or insufficient responses by data holders on data quality issues. The responsiveness of data holders will be afforded additional weight when deciding an appropriate regulatory response to non-compliance on data quality issues.

On an ongoing basis, the ACCC will continue activities to understand the nature and scope of data quality issues and their impact, in close collaboration with the OAIC, to inform regulatory action decision-making.

### ***Action 2 - Work to clarify obligations to improve data quality***

In some cases, the capacity to further clarify obligations will help to improve data quality.

The ACCC will work with Treasury, the OAIC, and the Data Standards Body (DSB) to develop new guidance on data quality related obligations and to consider clarifications to particular data quality related obligations in the CDR framework. For example, as a priority, the ACCC will raise issues identified in this consultation about data missing from 'optional' fields in the standards, due to misinterpretations of this requirement.

Where there is flexibility in how to comply with a particular obligation and this affects user experience, the ACCC will work with participants to understand whether publishing information from data holders about their implementation would assist users of this data. For example, to avoid duplication in raising issues with data holders, or to assist data recipients to design solutions that can interpret the different implementations.

### ***Action 3 - Engage with stakeholders to improve processes***

The ACCC will continue to review and improve processes associated with the Service Management Portal. This may include implementing service level agreements and developing new incident codes to ensure data quality incidents are appropriately tracked.

The ACCC will also conduct a consultation with stakeholders on the CDR public rectification schedule, and other communication channels, with a view to increasing transparency relating to data quality performance among participants.

This may include publishing known issues with data holders' product reference data. We will continue to work with participants and other CDR agencies to explore opportunities for a dedicated channel through which users of product reference data can raise issues directly with data holders.

## **Contact Us**

For more information, to contact us about this report or to report data quality issues, please contact [accc-cdr@accc.gov.au](mailto:accc-cdr@accc.gov.au).