



Australian Government



Consumer
Data Right

Participant Test Strategy

Version 1.0

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References

Table 1: References

#	Title	Location
R1.	CDR Rules	https://www.legislation.gov.au/Series/F2020L00094
R2.	CDR Rules - Phasing Table	https://www.cdr.gov.au/sites/default/files/2020-06/Revised%20phasing%20table%20-%2023%20June%202020.pdf
R3.	CDR Consumer Data Standards	https://consumerdatastandardsaustralia.github.io/standards/
R4.	CDR Register design	https://cdr-register.github.io/register/#introduction
R5.	CDR Consumer Experience Guidelines and Standards	https://consumerdatastandardsaustralia.github.io/standards/#consumer-experience
R6.	CDR Website	https://www.cdr.gov.au/
R7.	CDR On-boarding guide	https://www.accc.gov.au/focus-areas/consumer-data-right-cdr-0/finalised-on-boarding-guide
R8.	CDR CTS guidance material	https://www.accc.gov.au/focus-areas/consumer-data-right-cdr-0/cdr-conformance-test-suite
R9.	Phase 1 test scenarios	https://www.accc.gov.au/focus-areas/consumer-data-right-cdr-0/cdr-phase-1-test-scenarios-july-2020
R10.	Phase 2 test scenarios	https://www.accc.gov.au/focus-areas/consumer-data-right-cdr-0/cdr-phase-2-test-strategy-november-2020

1. Introduction

A critical element of the Consumer Data Right (CDR) ecosystem is the successful operation of participant technology solutions.

This **CDR Test Strategy** for the banking sector provides an outline of the Australian Competition and Consumer Commission's (ACCC) testing approach for participants that are looking to enter the ecosystem (new participants), and participants that are already part of the ecosystem (existing participants), to prepare for future releases and ensure continuous integrity and operation of the CDR ecosystem (ecosystem). This strategy has been drafted with consideration of future CDR sectors.

The CDR Test Strategy is a **scalable, automated approach** that **serves as a final checkpoint**, and relies on appropriate internal participant testing to be completed prior to commencing CDR Conformance Test Suite (CTS) testing.

2. Context

As the lead implementation entity, the ACCC provides a full spectrum of capabilities needed to deliver and support the CDR. These functions span a typical plan, design, build, test, run lifecycle with cyber security embedded across all functions, execution and realisation to support the successful delivery of outcomes. Key responsibilities include:

- analyse, design and drive the implementation of the CDR ecosystem
- create solutions
- on-board data holders
- on-board and accredit data recipients
- maintain and support CDR ecosystem
- drive stakeholder adoption
- manage cyber security.

This test strategy forms part of the 'run' phase of CDR delivery.

3. Key CDR test principles

The CDR Test Strategy is underpinned by the following principles:

- Each new participant can enter the ecosystem without disruption to existing participants and ensure growth and continued operation of the ecosystem.
- Participants are accountable for testing and verifying their solutions in coverage and quality to meet the CDR Rules (Rules) [R1], Consumer Data Standards [R3] and CDR Register (Register) design [R4] obligations.
- Participants must ensure the functionality of their solution is extensively tested internally, prior to requesting access to the CTS and commencing conformance testing, or deploying a new version of their solution in the ecosystem. This includes an expectation that participants will conduct relevant non-functional testing, such as security testing, performance testing, availability testing, usability testing, penetration testing etc. to ensure their solution also meets the non-functional requirements.

4. CDR internal participant testing approach

Prior to testing in the ACCC CTS environment or moving solutions to production, it is expected that participants would perform extensive testing of their solution in line with accepted software engineering practice and their organisation's testing procedures.

3.1 Internal participant testing guidelines

The ACCC expects that new and existing participants use an established testing process (see Figure 1), in conjunction with formal software release and risk management processes undertaken within their organisation. Participants should be confident that their CDR solution correctly implements the relevant CDR scope and works as intended.

CDR [Phase 1](#) and [Phase 2](#) test scenarios can be used as examples to support participants' internal testing activities¹.

Should the need arise, the ACCC may request information from participants on their test report and outcomes under the mandate of the Rules.

New and existing participants are expected to complete all build and internal participant testing prior to testing against the CTS.

New and existing participants are expected to ensure that their solutions correctly implement the relevant CDR release scope. In addition, existing participants should perform regression testing on previously tested code to ensure no defects have been introduced.

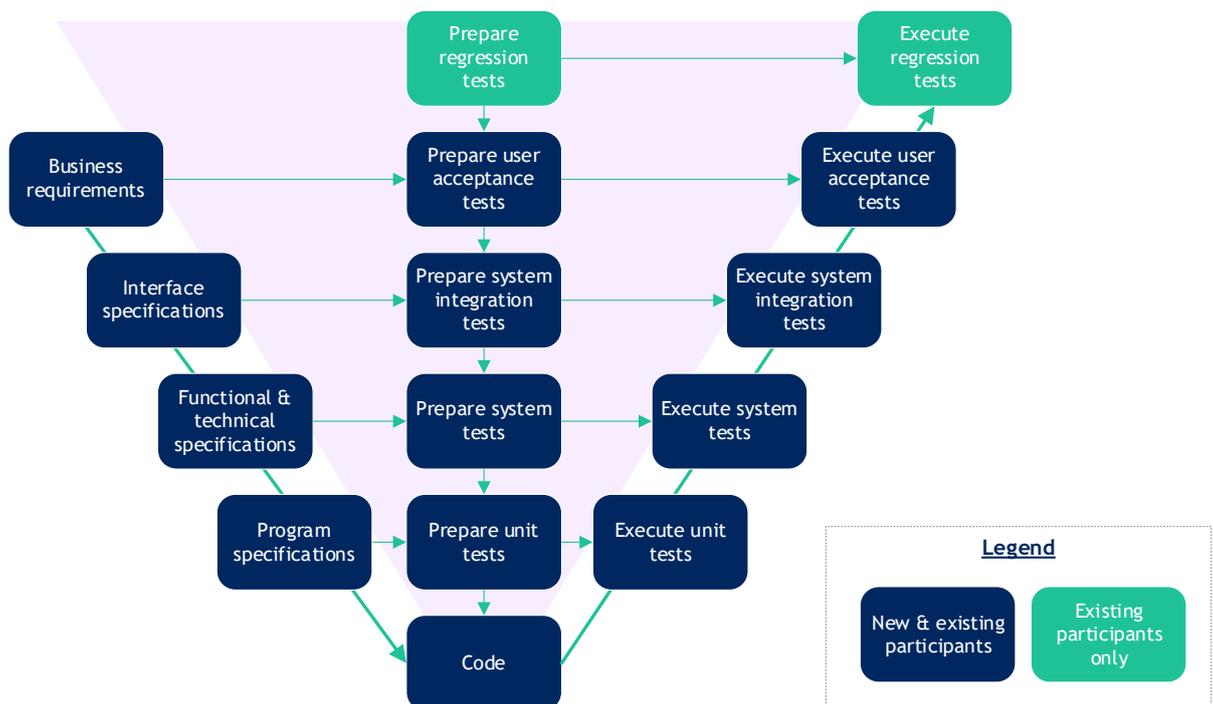


Figure 1: Illustrative internal participant test approach²

¹ These artefacts are based on previous versions of the Consumer Data Standards and Register design.

² As per industry best practice, participants should plan for an appropriate level of production verification to validate end-to-end processes in the production environment.

5. CDR conformance testing approach

The CTS is a final checkpoint to verify the operability of a participant's solution before deployment into production.

4.1 CTS introduction

The CTS³ is maintained by the ACCC and provides a suite of automated test cases that are to be executed against accredited data recipient (ADR) and data holder (DH) solutions. The primary focus of the CTS is to verify security profile and consent components of the participants' solutions with the objective to mitigate critical points of failure within the ecosystem.

As per standard software development life cycle practices, it is assumed that participant solutions have been developed and quality assured before conformance testing commences. The CTS is a final checkpoint to verify the operability of key elements of your solution before deployment into production.

Passing all CTS tests does not guarantee compliance with the Rules [R1], Consumer Data Standards [R3] and Register design [R4] obligations.

4.2 Conformance testing approach for new participants

The conformance testing approach for new participants is based on the following:

- Participant solutions should be fully developed and quality assured by the participant before conformance testing commences.
- New participants must verify their solution by executing test scenarios through the CTS as part of the on-boarding process.
- New participants will need to complete all the CTS tests before they proceed to the CDR production environment and are made **active** on the Register. If a participant is unable to execute (e.g. if certain tests are not relevant for an ADR offering) all applicable tests, they are required to inform the ACCC, as outlined in the [CTS guidance material](#).

Figure 2 outlines the steps for internal participant testing in relation to conformance testing activity, and the sequence of the CTS in relation to when new participants can commence live data sharing:

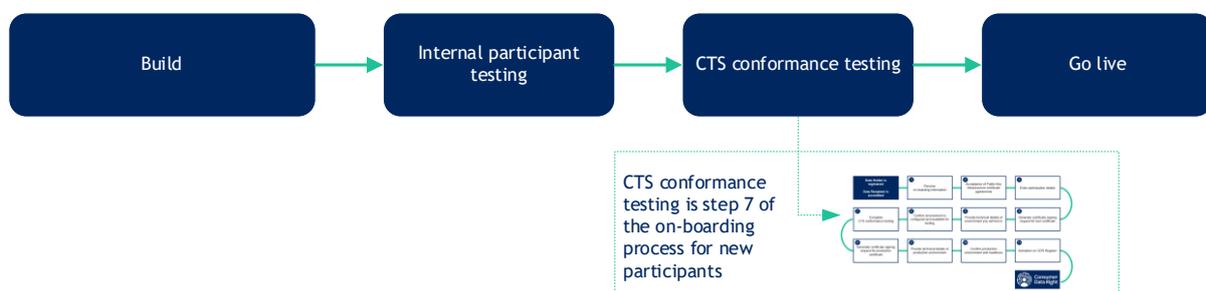


Figure 2: Internal participant testing in relation to conformance testing

³ The CTS guidance material for DHs and ADRs, including the enrolment form can be found [here](#). The CTS guidance material includes test data requirements for DHs.

Internal participant testing for new participants can be conducted prior to and in parallel to Steps 1 to 6 of the on-boarding process.

4.3 Conformance testing approach for existing participants

Participants test their solution by executing relevant test scenarios through the ACCC CTS.

4.3.1 Voluntary testing

The CTS will be readily accessible for existing participants to use on a voluntary basis. Existing participants are encouraged to retest through the CTS:

- if they make a significant change to their solution/technology
- when there is a significant change in the standards
 - even if there is no material impact to the CTS, retesting through the CTS can be an effective form of regression testing

Figure 3 outlines the anticipated sequence of a participant’s internal testing in relation to the CTS, when existing participants update their solution.



Figure 3: Existing participants - update in participant solution

4.3.2 Mandatory and requested testing

Under certain circumstances, the ACCC may mandate or request existing participants re-test their solution through the CTS, to reduce broader ecosystem risk. This may include a sub-set or all of the CTS tests in a test suite. The following factors will form part of the consideration for such a request:

- at the ACCC’s Compliance & Enforcement Team’s request through routine or targeted enforcement activities
- release of a new CTS version
- introduction of a new sector
- changes to the Rules [R1] and/or Consumer Data Standards [R3]
- the stability of the ecosystem (e.g. info security concerns)
- volume and severity of incidents in ecosystem
- proportion of participants voluntarily conducting conformance testing

In such circumstances, the ACCC will outline why they are mandating or requesting CTS re-testing.

Figure 4 outlines the anticipated sequence for conformance testing in relation to production deployments when existing participants are notified of ACCC expectations regarding re-test.



Figure 4: Existing participants - re-test as requested by the ACCC

Appendix A: Terminology

Shortened Form	Extended Form
ACCC	Australian Competition and Consumer Commission
CDR	Consumer Data Right
CDR Rules	Competition and Consumer (Consumer Data Right) Rules 2020
CDS	Consumer Data Standards
CTS	Conformance Test Suite
Data holder (DH)	A legal entity (participant) that generates data through its operations that is designated under the CDR legislation
Accredited data recipient (ADR)	A legal entity (participant) that can receive CDR data
Participant	In this context, a participant is an entity that has been accredited (data recipient) or registered (data holder) and is preparing or currently undertaking on-boarding in order to participate in the CDR regime
New participant	A participant entering the CDR ecosystem for the first time
Existing participant	A participant already part of the CDR ecosystem
