On-boarding in CDR

Fact sheet

December 2022

Version Control

December 2020	Version 1	First version of fact sheet
December 2022	Version 2	Editorial changes and updated links

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1.   Introduction

1.1.   The Consumer Data Right

The Consumer Data Right (CDR) gives consumers greater control over their data, enabling them to access and share their data with accredited third parties to access better deals on everyday products and services.

A glossary of common terms is published on the [CDR website](#).

1.2.   On-boarding in the CDR

Participants must be registered as a data holder or obtain accreditation as a data recipient to participate in the CDR system.

On-boarding is the process that a new participant must complete before they can fully participate in the CDR ecosystem. Each participant must successfully complete all steps in the on-boarding process before they can begin to share data.

1.3.   This fact sheet

This fact sheet has been produced by the Australian Competition and Consumer Commission (ACCC). It provides information about the on-boarding process for the CDR system.

For a more complete view of how the CDR ecosystem operates, participants should read this guide together with:

- the [CDR participant on-boarding guide](#)
- the CDR [FAQs](#) and '[how it works](#)' educational video
- the [CDR glossary](#)
- the ACCC's CDR [Accreditation guidelines](#)
- the CDR [Accreditation fact sheet](#)
- the CDR [Conformance Test Suite guidance](#) material and [application form for accredited data recipients](#)
- the [Competition and Consumer (Consumer Data Right) Rules 2020](#) (CDR Rules)
- [Consumer Experience Guidelines and Consumer Experience Standards](#)
- the OAIC's [CDR privacy safeguard guidelines](#)
- the [Consumer Data Standards](#) (Standards).

2.   The on-boarding process

Following successful completion of registration (for data holders) or accreditation (for data recipients), the data holder/recipient can commence the on-boarding process.

On-boarding is managed by the Consumer Data Right Registrar (the Registrar), which is currently the ACCC, and requires participants to complete a series of steps including the CDR Conformance Test Suite.

After successfully completing all steps in the on-boarding process, the Registrar makes the participant 'active' on the CDR Register and they can start sharing and/or receiving consumer data in the CDR ecosystem.

Figure 1 below shows how the on-boarding process fits within the CDR system and leads to participation in the CDR ecosystem.

Figure 1: Process for accessing the CDR Ecosystem
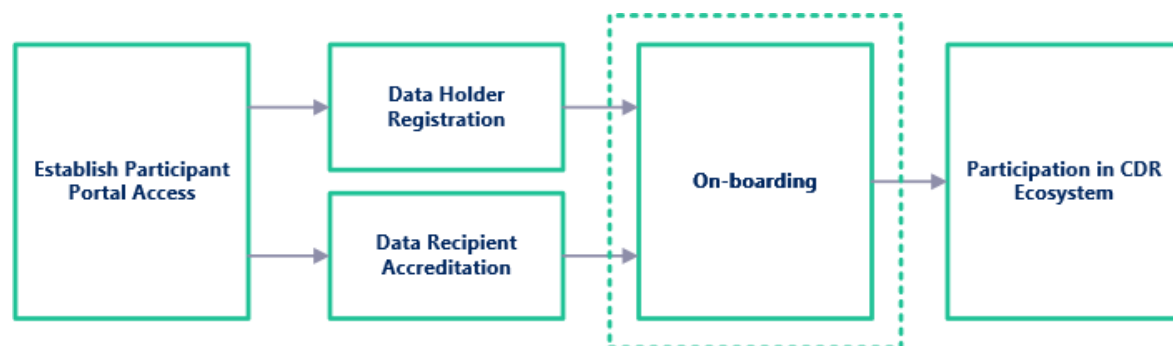
2.1.   On-boarding of data holders and data recipients

Both CDR data holders and CDR data recipients are required to on-board.

The steps for on-boarding are the same for both data holders and data recipients. However, the information collected and some of the on-boarding activities may differ slightly.

More information on the registration and accreditation processes, including how to become an accredited data recipient, can be found in the CDR participant on-boarding guide on the CDR website.

2.2.   Steps in the on-boarding process

To complete the on-boarding process, a participant:

- Accepts the terms and conditions in the Registrar's Public Key Infrastructure (PKI) Subscriber and Relying Party Agreements. These agreements govern the use of the digital certificates (see section 2.3).

- Accepts the CDR Trade Mark License Agreement to enable use of the CDR logo (optional for data holders and mandatory for data recipients). The CDR logo will be provided to the participant by the ACCC.

- Accesses and completes Conformance Test Suite activities (CTS). Access to CTS requires a participant to request, and be issued with, a test certificate by the ACCC. A test plan will then be allocated.

- Updates all required technical details for their production environment and requests the production certificate.

When the participant has met all the above requirements, the Registrar will mark them as 'active' on the Register.

2.3.   PKI certificates

The PKI ensures the security, integrity and stability of the Register and enables functional operation in the Conformance Test Suite and the CDR ecosystem.

Digital certificates are an important part of the PKI. PKI digital certificates provide secure and private communications between participants. The ACCC, as the Registrar, is responsible for issuing PKI certificates to participants.

2.4.   Agreements that must be made for CDR on-boarding

The procedural and operational requirements for using PKI certificates are governed by 2 agreements: the Subscriber Agreement and the Relying Party Agreement.

The participant will also need to sign the Consumer Data Right Trade Mark Licence Agreement, which governs the use of the CDR logo (see section 2.4.3).

2.4.1.   Subscriber Agreement

The Subscriber Agreement establishes the basis on which digital certificates are issued to participants. Subscriber Agreements also establish the role participants are required to play in safeguarding and managing certificates issued to them to maintain the overall integrity, security, and stability of the Register.

2.4.2.   Relying Party Agreement

The Relying Party Agreement demonstrates a participant's agreement to the ACCC Certificate Policy. This is a detailed outline of the certificate's terms and conditions of use and the basis on which participants rely on the integrity of an ACCC digital certificate.

Each participant will receive detailed documents about the use of certificates in the ecosystem:

- A **Certificate Policy** document defines how the ACCC, as Registrar, intends to manage its PKI accounts and establishes the terms and conditions of participants' use.
- A **Certification Practice Statement** is a detailed procedural document describing how the ACCC, as Registrar, intends to implement its Certificate Policy.

2.4.3.   CDR logo licensing agreement

The Consumer Data Right Trade Mark Licence Agreement sets out the terms and conditions for using the CDR logo. Participants must sign the agreement before they can use the logo.

The logo is intended to be a symbol of trust in the ecosystem. The ACCC encourages all participants to use the logo in the consent and authorisation processes provided to consumers.

2.5.   Timeframe for CDR on-boarding

The time it takes to complete the on-boarding process will be determined by:

- how ready the participant is

- how mature the participant's software solution is

- the level of accuracy and completeness of information they supply during the process

- how promptly they accept the required agreements.

By the time a participant is ready to on-board, they should have already completed an internal quality assurance of their software solution to ensure that it can comply with the requirements in the CDR Rules and Standards.

When preparing for conformance testing, participants may need to make changes to their technical environment (such as IP address whitelisting and certificate configuration) to enable communication between the Conformance Test Suite and the participant's test IT environment. The time participants take to make these changes also contributes to overall on-boarding timeframes, as does their ability to diagnose and resolve issues that may occur during testing activities.

Table 1 shows a sample timeframe. This information is a guide only, as the time it will take for each participant to move through each step of the process will vary depending on their own internal procedures and practices.

Table 1: On-boarding timelines

Participant type	Portal access	Accreditation/ Registration	On-boarding
Data recipient	within 3 business days	within 2-3 months*	1-3 months
Data recipient (who is an ADI)	within 3 business days	within 4 weeks**	1-3 months
Data holder	*ACCC will notify when access can be requested for the purpose of registering as a data holder*		2-3 months***

* Estimate based on early experience; likely to change in the future. Shortened timeframe expected when the participant provides accurate and complete information at the start of the accreditation process.

** Streamlined accreditation as an authorised deposit-taking institution (ADI).

*** Data holders have obligations to meet, which may involve additional time and effort during testing.

2.6. Access to the on-boarding process

Prospective data holders should subscribe to the CDR newsletter to keep up to date on when they can start the process to register as a data holder, and for regular updates on on-boarding, including the Conformance Test Suite.

Providers who wish to become accredited data recipients can request access to the CDR Participant Portal so that they can apply.

Previous CDR newsletters can be found on the CDR website.