

# RETAIL BANKING MARKET INVESTIGATION ORDER 2017

## Notice of approval of changes to the Agreed Timetable and Project Plan

### Background

1. This notice is published pursuant to Article 10.6.1 of the Retail Banking Market Investigation Order 2017 (the **Order**), whereby changes to the Agreed Timetable and Project Plan may be proposed by the Implementation Trustee but will require the approval of the CMA.
2. All terms used in this notice are to be interpreted in accordance with Article 9 of the Order unless an alternative definition is expressly provided for.
3. On the 17 November 2017, in accordance with Article 10.6.1 of the Order, the Implementation Trustee submitted to the CMA a proposal for revisions to the Agreed Timetable and Project Plan set out in Schedule 1 Part B of the Explanatory Note to the Order. The CMA approved the revisions proposed by the Implementation Trustee and published a [notice](#) of its approval on 22 November 2017.
4. On 10 July 2018, the Implementation Trustee proposed further changes to the Agreed Timetable and Project Plan as amended in November 2017. The CMA approved the revisions proposed by the Implementation Trustee and published a [notice](#) of its approval on 26 July 2018.
5. On 3 February 2020, the Implementation Trustee wrote to the CMA setting out his proposals for further changes to the Agreed Timetable and Project Plan as amended in July 2018 together with a description of the consultation process that he engaged in between 19 November 2019 and 15 January 2020.
6. On 5 February 2020 the CMA published a notice explaining that it

was considering whether to approve the proposals for further changes to the Agreed Timetable and Project Plan for the purposes of Article 10.6.1 of the Order and invited any interested parties to make representations to the CMA by 26 February 2020. The CMA received representations from 16 market participants.

7. The CMA published a [Notice](#) of approval of certain changes and requirement for additional changes to the Agreed Timetable and Project Plan on 7 April 2020. This set out certain changes that it wished to make to the content of the Agreed Timetable and Project Plan and, in view of the uncertainties arising from the Covid-19 crisis, to the timings within the Agreed Timetable and Project Plan.
8. The CMA requested the Implementation Trustee to make the changes that it specified and a revised Agreed Timetable and Project Plan was submitted to the CMA by the Implementation Trustee on 13 May 2020.

### **Notice of approval of changes to the Agreed Timetable and Project Plan**

9. The CMA has reviewed and hereby gives notice of its approval of the changes to the Agreed Timetable and Project Plan. Therefore, as of the date of this notice, the Agreed Timetable and Project Plan are on page 3.
10. For the avoidance of doubt the Agreed Timetable and Project Plan set out on page 3 supersedes the version set out in Schedule 1 Part B of the Explanatory Note to the Order and that set out in the earlier notices dated 22 November 2017 and July 2018.
11. The CMA expects that the Agreed Timetable and Project Plan will be implemented in accordance with the detailed description of each of the scope items set out in the Roadmap Accompanying Definitions. This is subject to any further changes to the Agreed Project Plan and Timetable made pursuant to Article 10.6 of the Order, including any changes to timing that may be necessitated by the evolution of the Covid-19 crisis.

**Adam Land**  
**Senior Director, Remedies, Business and Financial Analysis**  
**15 May 2020**

# CMA Order Roadmap – May 2020

**Key:**

- Industry Consultation (IC)
- CMA9 Implementation
- CMA9 Finish Implementation - Deferral Available
- Minor Industry Consultation (IC)
- OBIE Activity
- Date subject to change if the Crisis Impact Period is extended beyond June e.g. +1, +2, +3 etc

			2020												2021													
Trustee Rep Ref	P Ref	Brief Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
			Crisis Impact Period						+1	+2	+3	+4	+5	+6	+7	+8	+9	+10	+11	+12	+13	+14	+15	+16	+17	+18		
A2(a)(i)	P2	2-way notification of revocation			Finish	Implementation								Earliest evaluation	Prep	IC	Report	----->						Latest evaluation	Prep	IC	Report	
A2(a)(ii)	P8	Trusted beneficiaries			Finish Implementation																							
A2(a)(iii)	P7	Reverse payments			Finish	Implementation phase 1						Implementation phase 2																
A2(b)(i)	P5b	Variable Recurring Payments	FCA sandbox execution																									
		VRP standard			Draft						IC			Draft 2	IC	Standard												
A2(b)(iii)	P15	Consent and Access Dashboards			CASS standard	Draft	IC	Standard	Implementation																			
		Dashboards review			Prep			IC			Report	Draft	IC			Standard	Implementation											
A2(c)(ii)	P17	Management Information			Draft			IC			Standard	Implementation						Ongoing monitoring										
A2(c)		Customer Evaluation Framework	Framework development						IC			Report																
A2(d)	P19	Evolving standards re CRM/CoP			CRM/CoP standard	Draft (in conjunction with LSB, PSR, Pay.UK)						IC			Standard	Implementation												
A3		Functional/CEG Conformance	v3.1.3		23/03/2020	v3.1.4		20/06/2020	v3.1.5		30/09/2020	Ongoing conformance																
A4		Performance Improvement Plans	Initial PIPs issued to CMA9						Ongoing review/issuance																			
A7	P4	Root cause analysis			Prep			Bilateral investigations						Report														
A10		Sweeping evaluation			Prep			IC			Report	Draft	IC	Standard	Implementation													
A12		TPP Side Customer Protection			Draft			TPP Consultation			Standard																	

This document is supplemented by and shall be read in conjunction with the "Roadmap Accompanying Definitions".

# OPEN BANKING IMPLEMENTATION ENTITY

## Roadmap Accompanying Definitions

This document supplements and shall be read in conjunction with the “CMA Order Roadmap – May 2020”

## **Section 1: Items from Current Roadmap that Require Updating (A2)**

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2 (a)(i)	Two way notification of revocation	P2	Customers need to be able to easily and reliably revoke consent. They should be able to revoke access in an ASPSP access dashboard and ensure the TPPs are efficiently updated in real time.	<p><b>Initial Evaluation:</b></p> <ul style="list-style-type: none"> <li>Completed.</li> </ul> <p><b>Standards Development:</b></p> <ul style="list-style-type: none"> <li>Completed.</li> <li>Standards already incorporate aggregate polling and push notifications.</li> </ul> <p><b>CMA9 Implementation (deferral possible):</b></p> <ul style="list-style-type: none"> <li>Mandatory CMA9 implementation of aggregated polling to be no later than the end of June 2020 (Subject to any Deferrals approved by the Trustee).</li> </ul> <p><b>Follow-on Evaluation:</b></p> <ul style="list-style-type: none"> <li>Follow-on three month Evaluation, to assess whether push notifications should be implemented, to take place at the earlier of: <ul style="list-style-type: none"> <li>a) Once 25% of TPPs by API volume have implemented aggregated polling, but no earlier than 6 months post Crisis Impact Period; or</li> <li>b) 15 months post Crisis Impact Period.</li> </ul> </li> <li>Follow-on Evaluation to consist of: <ul style="list-style-type: none"> <li>a) <b>OBIE preparatory work:</b> for one month starting min six/max 16 months after the end of the Crisis Impact Period.</li> <li>b) <b>Industry consultation (with CMA9 Participation):</b> for one month, to commence min seven months /max 16 months after end of the Crisis Impact Period.</li> <li>c) <b>Final Report:</b> to be completed within one month of the completion of the industry consultation. If the report recommends the implementation of push notifications, such a recommendation would be a matter for consideration by the CMA.</li> </ul> </li> </ul>
A2 (a)(ii)	Trusted beneficiaries	P8	Customers need to be able to enjoy the same payment experience, with respect to the authentication journey, regardless of whether it is PISP-initiated or through the ASPSP's direct channel.	<p><b>Preliminary Evaluation:</b></p> <ul style="list-style-type: none"> <li>Completed.</li> </ul> <p><b>Standards Development:</b></p> <ul style="list-style-type: none"> <li>Completed.</li> </ul> <p><b>CMA9 Implementation (deferral possible):</b></p> <ul style="list-style-type: none"> <li>Mandatory CMA9 implementation to be no later than end of October 2020 (Subject to any Deferrals approved by the Trustee).</li> <li>If the ASPSP already provides parity of customer experience with respect to exemptions with its direct channel, no action is required.</li> </ul>

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2(a)(iii)	Reverse payments	P7	PISPs should be able to easily action a reverse payment to satisfy a customer's entitlement to a refund. This is critical to customer adoption and a level playing field.	<p><b>Preliminary Evaluation:</b></p> <ul style="list-style-type: none"> <li>• Completed. <ul style="list-style-type: none"> <li>- Initial evaluation of options and recommendations submitted to IESG for discussion on 19 November 2019.</li> <li>- Trustee Actions published end of November 2019.</li> </ul> </li> </ul> <p><b>Standards Development:</b></p> <ul style="list-style-type: none"> <li>• Completed.</li> </ul> <p><b>CMA9 Implementation:</b></p> <ul style="list-style-type: none"> <li>• <b>Implementation Phase 1 (single immediate payments using Faster Payments)</b> – mandatory implementation to be completed by end of June 2020 (subject to any deferrals agreed by the Trustee). In parallel, Implementation Trustee to liaise directly with the ICO to confirm, or otherwise, the integrity of the mandated standard. Such confirmation to be shared with the CMA9 prior to launch of this functionality.</li> <li>• <b>Implementation Phase 2 (other payments)</b> – mandatory implementation to be completed within six months after the end of the Crisis Impact Period. Banks can voluntarily choose to implement these items during the CIP.</li> </ul> <p><b>Ancillary activities:</b></p> <ul style="list-style-type: none"> <li>• Data privacy and security: <ul style="list-style-type: none"> <li>- Implementation Trustee to convene and chair working group of open banking stakeholders, to explore how other elements of this Roadmap, such as the TPP code and the CEG, could be further strengthened in future updates to the OB standards to address concerns around data security.</li> <li>- Implementation Trustee to advise the CMA on the timing of this work group and the timeframe for developing a plan to address the concerns around data security.</li> <li>- Progress report to CMA by end of June 2020.</li> </ul> </li> <li>• PIS customer protection: <ul style="list-style-type: none"> <li>- Implementation Trustee to convene and co-chair with the Payment Systems Regulator a working group, to identify options for addressing consumer protection concerns when using FPS including PIS within the open banking ecosystem. Progress report to CMA by end of August 2020.</li> </ul> </li> </ul>

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2 (b)(i)	Variable Recurring Payments	P5(b)	Completion of the assessment of Variable Recurring Payments including review of learnings from the FCA's Regulatory Sandbox.	<p><b>FCA Regulatory Sandbox Execution</b></p> <ul style="list-style-type: none"> <li>• Execution of FCA Regulatory Sandbox including provision of Report, with a particular focus on consumer protection, by end of October 2020.</li> </ul> <p><b>VRP Standards Development:</b></p> <ul style="list-style-type: none"> <li>• Including functional specifications, Customer Experience Guidelines, consumer protection framework / rulebook, and dispute management.</li> <li>• <b>First Draft Standards:</b> commenced March 2020, to complete by end of October 2020.</li> <li>• <b>Industry consultation (including CMA9 Participation) on first Draft Standards:</b> for two months, to commence four months after end of the Crisis Impact Period.</li> <li>• <b>Second Draft Standards:</b> for one month, six months after the end of the Crisis Impact Period.</li> <li>• <b>Industry consultation (including CMA9 Participation) on second Draft Standards:</b> for one month, to commence seven months after end of the Crisis Impact Period.</li> <li>• <b>Final Standard &amp; Report:</b> to be published nine months after the end of the Crisis Impact Period.</li> </ul>



Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2 (b)(iii)	Evaluation of Efficacy of Consent and Access Dashboards	P15	Customers need to have consent and access dashboards that enable them to manage all aspects of their consents and access, including when switching accounts (via CASS).	<p><b>CASS Standards Development:</b></p> <ul style="list-style-type: none"> <li>Incorporate CASS proposals into OB Standard, including technical specifications, Customer Experience Guidelines and Operational Guidelines. This work to include: <ul style="list-style-type: none"> <li><b>OBIE preparatory work:</b> for one month in April 2020.</li> <li><b>Minor industry consultation</b> (including CMA participation, not considered to be significant due to low level of complexity), during the month of May 2020.</li> <li><b>Standard:</b> to be published at the end of June</li> </ul> </li> <li>If the OBIE preparatory work on the CASS requirements results in the need for a more complex solution, consultation to be deferred until one month after the end of the Crisis Impact Period.</li> </ul> <p><b>CASS Standards CMA9 Implementation:</b> within six months of end of Crisis Impact Period.</p> <ul style="list-style-type: none"> <li>Mandatory CMA9 implementation of the new OB Standard.</li> </ul> <p><b>Dashboards review:</b> from beginning of July 2020 to five months after the end of the Crisis Impact Period.</p> <ul style="list-style-type: none"> <li>Compare and contrast the consent and access dashboards that are live in the market, and where necessary recommend changes to the Customer Experience Guidelines: <ul style="list-style-type: none"> <li><b>OBIE preparatory work:</b> from the beginning of July 2020 to the end of August 2020.</li> <li><b>Industry consultation (with CMA9 Participation):</b> for two months starting two months after the end of the Crisis Impact Period.</li> <li><b>Report:</b> dashboard review report to be published five months after the end of the Crisis Impact Period.</li> </ul> </li> </ul> <p><b>Dashboards Standards Development:</b></p> <ul style="list-style-type: none"> <li>If changes to the Customer Experience Guidelines are necessary following Evaluation, then the Customer Experience Guidelines shall be updated to incorporate those changes: <ul style="list-style-type: none"> <li><b>OBIE preparatory work:</b> for one month starting five months after the end of the Crisis Impact Period.</li> <li><b>Industry consultation (with CMA9 Participation):</b> for two months starting six months after the end of the Crisis Impact Period.</li> <li><b>Standard:</b> to be published nine months after the end of the Crisis Impact Period.</li> </ul> </li> </ul> <p><b>Dashboards CMA9 Implementation:</b> to be completed within 15 months after the end of the Crisis Impact Period.</p> <ul style="list-style-type: none"> <li>If there is an update to the Customer Experience Guidelines, the CMA9 shall implement those updated guidelines.</li> </ul>

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2 (c)(ii)	MI	P17	The Trustee and the ecosystem need to be able to access and use timely information about the APIs provided by ASPSPs.	<p><b>OBIE Preparatory Activity:</b></p> <ul style="list-style-type: none"> <li><b>Draft Standards:</b> an OBIE Discovery phase to include design of improved MI provision and reporting, with co-ordination of development with other regulators, to ensure consistent definitions and reporting requirements, commenced March 2020, to complete by end of June 2020.</li> </ul> <p><b>Industry Consultation (including CMA9 Participation):</b> for two months, to start at the end of the Crisis Impact Period.</p> <p><b>Final Standards:</b> to be published three months after the end of the Crisis Impact Period.</p> <p><b>CMA9 Implementation:</b></p> <ul style="list-style-type: none"> <li>Mandatory CMA9 implementation of the OB Standard to be completed nine months after the end of the Crisis Impact Period.</li> </ul> <p><b>Ongoing Monitoring:</b></p> <ul style="list-style-type: none"> <li>Ongoing monitoring and review of the MI, which may include input from the Customer Evaluation Framework (A2)(c)(iii), to start nine months after the end of the Crisis Impact Period.</li> </ul>
A2 (c)(iii)	Customer Evaluation Framework	N/A	The Customer Evaluation Framework is required to enable the CMA, the Trustee and the ecosystem to assess progress towards meeting the underlying policy objectives of Open Banking.	<p><b>OBIE Preparatory Activity -Framework Development:</b></p> <ul style="list-style-type: none"> <li>In conjunction with the Personal Finance Research Centre (PFRC) at the University of Bristol, work to develop a meaningful framework and consult on the purpose, governance and key components of the framework and the relevant measures, to be completed by end of June 2020 (scope to also include Account Comparison).</li> </ul> <p><b>Industry Consultation (including CMA9 Participation):</b> to commence from the end of Crisis Impact Period for two months.</p> <p><b>Initial Report:</b> completion within six months of the end of the Crisis Impact Period.</p> <ul style="list-style-type: none"> <li>CMA to consider any proposals / actions arising from this workstream prior to being mandated by the Implementation Trustee.</li> </ul> <p><b>Ongoing Reporting:</b></p> <ul style="list-style-type: none"> <li>Periodic reviews from the start of 2021 (scope to also include Account Comparison).</li> <li>Consideration of Trustmark if further evidence demonstrate that it would be beneficial for the Open Banking ecosystem.</li> </ul>

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A2 (d)	Evolving Open Banking Standards re Confirmation of Payee and CRM Code	P19	The Standards need to ensure that customers experience low friction journeys that are consistent with the regulatory requirements of CoP and CRM Code.	<p><b>OBIE Preparatory Activity:</b> to complete by end of October 2020.</p> <ul style="list-style-type: none"> <li>Develop the OB Standards (including CEG and OG), in conjunction with Pay.UK, the Lending Standards Board and the Payment Systems Regulator, to ensure maintenance of low-friction, no obstacle customer journeys that take account of the requirements of the Contingent Reimbursement Model (CRM) code and Confirmation of Payee (CoP).</li> </ul> <p><b>Industry Consultation (to include CMA9 participation):</b></p> <ul style="list-style-type: none"> <li>Industry consultation (including CMA9 Participation): for two months, to commence four months after the end of the Crisis Impact Period.</li> </ul> <p><b>Final Standards:</b></p> <ul style="list-style-type: none"> <li>Final Standard: to be published seven months after the end of the Crisis Impact Period.</li> <li>The CMA's expectation is that the CMA9 will not implement CoP into any PIS customer journeys until the OB Standards specified in this Roadmap item have been developed and published.</li> </ul> <p><b>CMA9 Implementation:</b></p> <ul style="list-style-type: none"> <li>Mandatory CMA9 implementation of the new OB Standard to be completed within 13 months after the end of the Crisis Impact Period.</li> </ul>

**Section 2: Items that Relate to Conformance, Availability and Performance (A3 – A5)**

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A3	Functional and CEG Conformance	N/A	<p>TPPs need a reliable and conformant service delivering accurate data to build customer facing and business critical applications.</p> <p>Customers require simple, easy-to-use authentication and user journeys that are conformant with the Customer Experience Guidelines.</p>	<p><b>CMA9 Implementation:</b></p> <ul style="list-style-type: none"> <li>Version 3.1.3. CMA9 conformance required by 23<sup>rd</sup> March 2020 (subject to any Deferrals approved by the Trustee).</li> <li>Version 3.1.4. CMA9 conformance required by 20<sup>th</sup> June 2020 (subject to any Deferrals approved by the Trustee).</li> <li>Version 3.1.5. CMA9 conformance required within three months after the end of the Crisis Impact Period.</li> </ul> <p><b>Ongoing Conformance:</b></p> <ul style="list-style-type: none"> <li>Ongoing Conformance review to ensure continued conformance with the latest implemented versions of the Standards.</li> </ul>
A4	Performance Improvement Plans	N/A	<p>The availability and performance metrics of some of the CMA9 has consistently been below expectations, and the levels of their peers, resulting in detriment to customers and TPPs.</p> <p>Customers require simple, easy-to-use authentication and user journeys that are conformant with the Customer Experience Guidelines.</p>	<p><b>CMA9 Implementation:</b></p> <ul style="list-style-type: none"> <li>Initial Performance Improvement Plans (PIPs) for relevant CMA9 Providers, to be issued at end of August 2020.</li> </ul> <p><b>Ongoing Review:</b></p> <ul style="list-style-type: none"> <li>On-going review by OBIE monitoring function. Further Performance Improvement Plans (PIPs) will be issued as and when required.</li> </ul>
A5	Improvement in API Performance		<p>TPPs need a reliable and conformant service delivering accurate data to build customer facing and business critical applications.</p> <p>Customers require simple, easy to use authentication and user journeys that are conformant with the Customer Experience Guidelines.</p>	<p>Item deleted</p> <ul style="list-style-type: none"> <li>Requirement to develop consistent definitions and reporting requirements incorporated within A2(c)(ii) Management Information.</li> </ul>

## **Section 3: Items that Relate to Customer Adoption (A7 – A13)**










Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A7	Root Cause Analysis (RCA) on consent success (including consideration of alternative authentication mechanisms such as decoupled/ embedded/ delegated SCA)	P4	<p>Customers should be able to complete their transaction securely, easily and quickly. If they cannot, they are unlikely to use AIS and PIS. PIS, in particular, requires authentication to be simple and quick, as customers have come to expect from familiar card-based payments.</p> <p>A root cause analysis of poor consent success rates is required at the individual CMA9 level as well as at a group level. The RCA should inform recommendations to the CMA as to whether to consider in more detail alternative authentication mechanisms decoupled / embedded / delegated SCA.</p>	<p>A root cause analysis of the low rate of consent success, identifying underlying problems and potential solutions to increasing consent rates, separating AIS and PIS, and to include a review of the impact of polling.</p> <p><b>OBIE Preparatory Activity:</b> including consultations with TPPs, to be completed by the end of June 2020.</p> <p><b>Bilateral investigations with CMA9:</b> to start at the end of the Crisis Impact Period, for five months.</p> <ul style="list-style-type: none"> <li>To identify specific problems and solutions at a CMA9 provider level, and to understand if there any problems and solutions at an all-CMA9 level</li> <li>Reasonable requirements on individual CMA9 providers may be issued, as part of a Performance Improvement Plan, following the bilateral investigations.</li> </ul> <p><b>Report:</b> to be completed by eight months after the end of the Crisis Impact Period:</p> <ul style="list-style-type: none"> <li>Dependent on recommendations from the root cause analysis, the Report will review alternative mechanisms for authentication such as decoupled, embedded or delegated SCA.</li> <li>The Report may include recommendations for CMA9 implementation, which will be considered by the Trustee in consultation with the CMA.</li> <li>Any significant implementation requirement arising from this item will not be mandated unless and until the CMA is satisfied that its adoption would be proportionate.</li> </ul>

Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A10	Sweeping	N/A (linked to P5b)	<p>Customers must be able to benefit from “sweeping”. Sweeping includes use cases such as being able to automatically move funds between accounts of the same beneficial owner, to earn interest, mitigate fees or borrow on less expensive terms.</p> <p>Enabling customers to “sweep” between accounts from different providers was an express aim of the CMA’s package of remedies.</p>	<p><b>OBIE Preparatory Activity:</b> April 2020 – end October 2020</p> <ul style="list-style-type: none"> <li><b>Review:</b> to include a formal definition of “sweeping”, and consideration of existing payment methods to deliver sweeping such as Open Banking Single Immediate Payments, card-based continuous payment authority, and variable Direct Debits, and Variable Recurring Payments (aligned to the A2(b)(i) Evaluation), to be completed by end October 2020.</li> <li><b>OBIE Report:</b> to be presented for industry consultation.</li> </ul> <p><b>Industry consultations (to include CMA9 participation):</b></p> <ul style="list-style-type: none"> <li>Industry consultation (including CMA9 Participation) on OBIE Report: for two months, to commence four months after end of the Crisis Impact Period.</li> <li>Industry consultation (including CMA9 Participation) on Draft Standard: for one month, to commence seven months after end of the Crisis Impact Period.</li> </ul> <p><b>Standards Development:</b></p> <ul style="list-style-type: none"> <li>Draft Standard: to be completed seven months after the end of the Crisis Impact Period.</li> <li>Final Standard and Report: to be completed nine months after the end of the Crisis Impact Period.</li> <li>Should the Report recommend that VRPs should be the preferred or default method for sweeping, CMA to be satisfied that adoption would be appropriate and proportionate prior to approval of any implementation.</li> </ul> <p>The above activities shall, as a minimum:</p> <ul style="list-style-type: none"> <li>Determine how consumers should be protected and disputes managed, including implications for DMS.</li> <li>Review the proportionality of any recommendations for implementation.</li> <li>Consider how such functionality could be enabled in the market.</li> </ul> <p><b>CMA9 Implementation:</b> to be completed within six months of publishing the Standard starting from nine months after the end of the Crisis Impact Period.</p>



Reference	Roadmap Scope Item	Original Roadmap Item	Objective	Description & Work Activity
A12	TPP Side Customer Protection	N/A	Customer consent sits at the heart of Open Banking and is one of the foundation stones of customer trust. It is important that TPPs maintain high standards in this area.	<p><b>OBIE Preparatory Activity:</b> From beginning of April 2020 until the end of October 2020.</p> <ul style="list-style-type: none"> <li>Build on the existing TPP Guidelines to develop standards that address all aspects of consent and permissions, in particular the codification of purpose of data sharing.</li> <li>Review best practice related to operations, security, counter fraud, data management, data ethics, privacy policy and testing.</li> <li>Explore the feasibility and design of capturing consent and enabling traceability and auditability.</li> <li>Explore the potential of developing relevant best practice guidance with the ICO.</li> </ul> <p><b>TPP consultation</b></p> <ul style="list-style-type: none"> <li>Industry consultation with TPPs, for two months, to commence at the beginning of July 2020.</li> </ul> <p><b>Voluntary TPP Implementation:</b> to commence in November 2020.</p> <ul style="list-style-type: none"> <li>TPP-facing OB Standard to be implemented by TPPs (on a voluntary basis, supported by ICO Code if possible and if appropriate).</li> </ul>

## Section 4: Definitions related to the Key

Term / Key	Meaning
<u>Crisis Related</u>	
<b>Crisis Impact Period or CIP</b>	Pursuant to Clause 17 of the CMA Notice, the period during which the crisis is determined to have substantially impacted the CMA9 members' ability to implement change and participate in consultations related to Open Banking. During this period members of the CMA9 may request Deferrals as described below. No earlier than the 30 June 2020, the Trustee together with the CMA will determine when CIP is concluded.
<b>Deferral</b>	Pursuant to Clause 17 of the CMA Notice, Deferrals to defer implementation activity related to non-performance Proposal items, will be granted to CMA9 members, where the individual bank or building society can show that their change, deployment or other relevant capability is currently insufficient. Deferrals will be provided at the discretion of the Trustee.
<u>Activities</u>	
<b>Finish Implementation</b> 	Implementation of relevant standards to be completed by the CMA9, as already determined by the Trustee prior to this Revised Roadmap. Deferrals are available if required.
<b>Implementation</b> 	Implementation of relevant standards to be completed by the CMA9.
<b>Industry Consultation or IC</b> 	Consultation activity requiring the participation of representatives from the CMA9. Other participants (e.g. Third Party Providers or non-CMA9 ASPSPs) may also contribute to these consultations.
<b>OBIE Preparatory Activity or Prep</b> 	Preparatory activity undertaken by the OBIE either on its own or with support from third party providers, but without requiring CMA9 involvement. Examples of preparatory activities may include desktop research, fact gathering, fieldwork, option analysis etc., as required.
<b>Draft Standard or Draft</b> 	Preparation of a pre-consultation version by the OBIE of the open banking standards (not limited to technical specifications i.e. including Customer Experience Guidelines and Operational Guidelines).
<b>Standard</b> 	Preparation and publication of relevant standards by the OBIE. Publication process includes agreement at the Implementation Entity Steering Committee (IESG), or Trustee approval if no consensus reached.
<b>Report</b> 	Preparation and publication of relevant report by the OBIE. Publication process includes agreement at the Implementation Entity Steering Committee (IESG), or Trustee approval if no consensus reached.
<b>TPP Consultation</b> 	Consultation activity incorporating participation of third party providers, their representatives and other stakeholders. CMA9 participation is not required.
	The colour coding for all activities not requiring CMA9 participation.
<u>Other</u>	
<b>CMA Notice</b>	The notice entitled <i>"Notice of approval of certain changes and requirement for additional changes to the Agreed Timetable and Project Plan"</i> issued by the CMA on 7 April 2020. This notice may be accessed using this <a href="#">link</a> .

# **Open Banking Implementation Entity**

## **Accessibility document**

This document is a description of the “CMA Order Roadmap – May 2020” and has been prepared for the purpose of complying with accessibility requirements.

**Note: This document is a description of the “CMA Order Roadmap – May 2020” and has been prepared for the readers’ convenience. In the event of any inconsistency between this document and the “CMA Order Roadmap – May 2020”, the content in the “CMA Order Roadmap – May 2020” shall prevail.**

### **CMA Order Roadmap – May 2020**

The Crisis Impact Period is indicated as the period from the beginning of April to the end of June 2020.

#### **A2(a)(i) - P2 2-way notification of revocation:**

- CMA9 to finish implementation from January 2020 to June 2020 (Deferral available).
- Earliest evaluation: from January 2021 to March 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
  - OBIE prep activity for one month in January 2021.
  - Industry Consultation for one month in February 2021.
  - OBIE to complete report within one month in March 2021.
- Latest evaluation: from October 2021 to December 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
  - OBIE prep activity for one month in October 2021.
  - Industry Consultation for one month in November 2021.
  - OBIE to complete report within one month in December 2021.

#### **A2(a)(ii) - P8 Trusted beneficiaries:**

- CMA9 to finish implementation from January 2020 to October 2020 (Deferral available).

#### **A2(a)(iii) - P7 Reverse payments:**

- CMA9 to finish implementation of phase 1 from January 2020 to June 2020 (Deferral available).
- CMA9 implementation of phase 2 from July 2020 to December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A2(b)(i) - P5b Variable Recurring Payments**

- OBIE to undertake FCA sandbox execution between January 2020 and October 2020.
- OBIE to complete first draft of the VRP Standard between April 2020 to October 2020.
- Industry Consultation between November 2020 and December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

- OBIE to complete second draft of the VRP Standard in January 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- Industry Consultation in February 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- Standard completed in March 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A2(b)(iii) - P15 Consent and Access Dashboards**

- OBIE to draft CASS Standard within April 2020.
- Minor Industry Consultation for CASS standard within May 2020.
- OBIE to complete the CASS Standard in June 2020.
- CMA9 implementation of CASS Standard between July 2020 and December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to prepare Dashboards review from July 2020 to August 2020.
- Industry Consultation for Dashboards review from September 2020 to October 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete Dashboards review report in November 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete draft Dashboards standard in December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- Industry Consultation for draft Dashboards standard from January 2021 to February 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete the Dashboards standard in March 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- CMA9 Implementation of Dashboards standard from April 2021 to September 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A2(c)(ii) - P17 Management Information**

- OBIE to complete draft standard from March 2020 to June 2020.
- Industry Consultation from July 2020 to August 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete standard within September 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- CMA9 to implement standard from October 2020 to March 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- Ongoing monitoring by OBIE from April 2021 to December 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A2(c) - Customer Evaluation Framework**

- OBIE to complete framework development from January 2020 to June 2020.
- Industry Consultation from July 2020 to August 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete report from September 2020 to December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A2(d) - P19 - Evolving standards re CRM/CoP**

- OBIE to draft CRM/CoP standard (in conjunction with LSB, PSR, Pay.UK) from April 2020 to October 2020.
- Industry Consultation from November 2020 to December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete standard within January 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- CMA9 to implement standard from February 2021 to July 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A3 - Functional/CEG Conformance**

- CMA9 ongoing functional and CEG conformance from January 2020 to December 2021.
  - CMA9 implementation of V3.1.3 – due date 23 March 2020.
  - CMA9 implementation of V3.1.4 – due date 20 June 2020 (Deferral available).
  - CMA9 implementation of V3.1.5 – due date 30 September 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A4 - Performance Improvement Plans (PIPs)**

- Initial PIPs to be issued to the CMA9 by end of August 2020.
- Ongoing review / issuance of PIPs by OBIE from January 2020 to December 2021.

#### **A7 - P4 - Root Cause Analysis**

- OBIE preparatory activity to be carried out from April 2020 to June 2020.
- Bilateral investigations to be conducted from July 2020 to November 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete report from December 2020 to February 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

#### **A10 - Sweeping Evaluation**

- OBIE to complete sweeping preparatory activity from April 2020 to October 2020.
- Industry Consultation from November 2020 to December 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete draft standard in January 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- Industry Consultation on the draft standard in February 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete the standard in March 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- CMA9 Implementation from April 2021 to September 2021 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

**A12 - TPP Side Customer Protection**

- OBIE to complete draft standard between April 2020 and June 2020
- TPP Consultation to be conducted between July 2020 to September 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).
- OBIE to complete the standard between October 2020 and November 2020 (date subject to change if the Crisis Impact Period is extended beyond June 2020).

This document is supplemented by and shall be read in conjunction with the “Roadmap Accompanying Definitions”.