

## Submission

21 October 2022

Future Directions Unit  
Consumer Data and Digital Division  
Treasury  
Langton Cres  
Parkes ACT 2600

Via email: [data@treasury.gov.au](mailto:data@treasury.gov.au)

### **Re: Consumer Data Right - Exposure draft legislation to enable action initiation**

The Australian Communications Consumer Action Network (ACCAN) thanks the Treasury for the opportunity to comment on the *Consumer Data Right - Exposure draft legislation to enable action initiation*.

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

ACCAN supports the introduction of action initiation into the Consumer Data Right (CDR). Action initiation will provide consumers with easier, simpler means to confidently participate in the digital economy. Importantly, action initiation will allow for trusted third-parties to undertake actions on behalf of consumers so that consumers can more easily:

- Make payments.
- Manage accounts e.g. close or transfer them.
- Update personal details.

The action initiation scheme allows trusted third-parties to make requests with the same authority as if they had come directly from the consumer. For example, a third-party service could update a person's contact details across multiple accounts, find services that better meet a customer's needs and allow them to switch more easily.

Implementing action initiation will reduce the costs to consumers from actively participating in markets and drive competition. We consider that there are tangible benefits for consumers, not only in terms of time savings, but also with respect to financial savings through being able to act on insights from their CDR data more easily. Accordingly, we are supportive of the action initiation scheme being implemented.

We reiterate that the scheme should be developed and implemented in close consultation with consumers and their representatives. Noting recent high-profile consumer data breaches, it is more important than ever that the CDR provides robust data protections to ensure the security of

consumer data. These protections must be communicated to consumers through an appropriate public awareness campaign as well as targeted outreach with vulnerable consumer groups.

Another key concern with the action initiation scheme is its potential to contribute to domestic and family violence (DFV). We encourage Treasury to consider the implementation of further safeguards, to preclude DFV perpetrators from using the CDR, including the proposed action initiation scheme, to engage in controlling behaviour or to commit financial abuse.<sup>1</sup> We recommend careful consideration of these issues and further consultation with domestic and family violence services on potential safeguards as the CDR is expanded to the telecommunications sector.

We thank the Treasury for the opportunity to provide this submission and look forward to further engagement with the Treasury on the CDR. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at [REDACTED].

Yours sincerely,  
Samuel Kininmonth  
Policy Adviser

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*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.*

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<sup>1</sup> ACCAN 2022, *CDR Rules and Standards Design Paper*. Available at: [www.accan.org.au/accans-work/submissions/1978-cdr-rules-and-standards-design-paper](http://www.accan.org.au/accans-work/submissions/1978-cdr-rules-and-standards-design-paper)