25 October 2023

Consumer Data Right Policy and Engagement Branch
Market Conduct and Digital Division
Treasury
Langton Cres
Parkes ACT 2600

By email only: data@treasury.gov.au

Australian Payments Network (AusPayNet) welcomes the opportunity to respond to Treasury's consultation on policy options for regulating screen scraping practices in Australia.[1]

AusPayNet is the industry association and self-regulatory body for the Australian payments industry. We manage and develop standards and guidelines governing payments in Australia. AusPayNet currently has more than 150 members including financial institutions, payment system operators, major retailers and financial technology companies. Our purpose is to create confidence in payments by: setting enforceable industry standards for a safe, reliable and effective payments system; leading transformation in payments to drive efficiency, innovation and choice; and being the home for ecosystem collaboration and strategic insight.

As part of our strategic initiatives, AusPayNet is committed to working with members, government and other stakeholders to improve cyber security in the payments ecosystem and defend against the growing threat of economic crime, including scams and fraud. As noted in the consultation paper, screen scraping practices generate risks that run counter to these objectives. AusPayNet agrees with Treasury's assessment that screen scraping encourages customers to act in a way that is inconsistent with cyber security best practice, and can increase customer vulnerability due to personal authentication and other sensitive data being accessed, stored and used by third-party applications. In particular, we note that such personal authentication data could fall victim to cybersecurity attacks, fraud and/or scams at scale, should a screen scraping service provider be subject to a data breach.

AusPayNet has noted in previous submissions to Treasury that the future of the Consumer Data Right (CDR) should continue to enhance the security and stability of customer data exchange. We acknowledge that screen scraping has allowed fintechs to provide a range of new services to customers that may not have otherwise been available, and allowed financial institutions to more efficiently source accurate customer data to satisfy their risk management obligations. However, efficiency and customer convenience should not come at the expense of data security, particularly in the current environment of rapidly growing cyber and economic crime threats. As the CDR continues to be rolled out across the economy and new capabilities are enabled for the benefit of customers, we would therefore support a carefully managed phase out of riskier practices such as screen scraping.

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[1] The views expressed in this submission are those of AusPayNet Management, and may not necessarily represent the views of each of our members.

Please contact Kateryna Occhiutto, Head of Policy & Insights (kocchiutto@auspaynet.com.au) if you have any further questions on this matter.

Yours sincerely,

Andy White
Chief Executive Officer
Australian Payments Network