

New Zealand Fintech Pulsecheck

Open Banking and Beyond

2022: Discovery

Deloitte.
Digital



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Welcome

Jason Roberts – Executive Director, FinTech NZ

Welcome to this first collaborative report between Deloitte and FinTechNZ, being an annual series that will longitudinally track New Zealand's open banking ecosystem as it evolves.

While this report does cover a number of open banking examples in detail, for those new to the topic open banking can be summarised as a system that allows consumers to grant access to their data held at banks, to various third party businesses, to enable those third parties to provide services to those consumers. The data is accessed electronically, through APIs, or Application Programming Interfaces, and could include transaction records for use in a budgeting service, address data to use in a KYC process, or even actions initiated on behalf of the consumer such as making a payment. An exciting prospect of open banking is the ability to join various building blocks of 'read' and 'write' data access together to create innovative new business offerings.

This is the third Open Banking sector report developed over the past six months between FinTechNZ and our sector partners, preceded by both the *Open Finance and Digital Equity* report (which has a more strategic focus on shaping the Open Finance opportunity as a nation) and the second; the *TIN200 FinTech* report (very much focused on identifying current sector capability).

Read either independently – or collectively with this report, it is now possible for the reader to have a good, well researched understanding of the status of Open Banking/Open Finance sector in Aotearoa/New Zealand. Our intent is that these insights will help all actors across the sector identify challenges, opportunities and find potent ways to embrace the possibility of Open Banking for both sector, and ultimately customer, benefit

The Focus of this report is specifically on the 'Third Party Providers', or 'TPPs', the Fintechs that consumers will grant permission to access their data held by banks, in order to deliver services to the consumer.

This current survey is starting at an ideal and exciting time, with NZ's small fintech ecosystem on the verge of the having a game-changing enabler delivered in the form of the NZ government implementing a Consumer Data Right into legislation anticipated in 2023.

While legislation is only one part of a wider set of factors for sector enablement, it is a crucial first step for opening up and expanding sector innovation to the benefit of the whole sector. We hope that the insights from this report will assist all

As per the report title strapline 'Discovery', this year's report is about discovering:

- As a precursor to true open banking in the future, what types of 'permissioned data sharing' use cases are active in market, being readied, or attracting interest?
- What would NZ fintechs like to see considered by government as part of the upcoming CDR?

Where those questions are more readily understood in the context of answers to:

- While NZ awaits draft CDR legislation, what has the story been to date? How have we gotten to where we are?

- What is the current NZ environment that 'open banking'-style fintechs operate in and what is likely to change when NZ introduces a formal Consumer Data Right?
- What lessons can be learnt from other countries as they have implemented similar constructs?

In FinTech NZ's experience annual surveys can take some time to gain momentum and enough profile to enter a steady state of participation. We are greatly encouraged by the level of engagement shown by the fintechs in participating in the survey and interviews that informed this 2022 report, and look forward to even more engagement from a hopefully much expanded market of participants in the future as more fintechs take advantage of the immense opportunities the CDR will offer.

Jason Roberts

Executive Director

FinTechNZ

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Introduction

2022 is set to be a landmark year for financial services in New Zealand, with the much-anticipated release of legislation to define a Consumer Data Right for the country. This will mark the change in direction for open banking in NZ from the original industry-led approach to a regulated one that aligns with Australia and the United Kingdom, that change originally having been raised as a possibility by Minister Faafoi in December 2019.

Anticipating that we are about to enter a period of exciting, rapid change and evolution in this area, we are launching The New Zealand Fintech Pulsecheck as a targeted annual snapshot of how NZ FinTechs are working - and would like to work - with financial services providers such as banks across open banking and related 'permissioned data sharing' use cases. By this we mean use cases that involve a consumer granting a 'third party' access to the consumer's data held at a bank or similar institution. As Jason noted in his Welcome, in contrast with the two other reports produced recently by FintechNZ, this Pulsecheck hones in specifically on those third parties, who we term throughout this report Third Party Providers, or 'TPPs' - a term borrowed from UK open banking.

We have given the report this year the strapline 'Discovery' - to our knowledge no one has attempted to discover the breadth of both current activity and interest from prospective market entrants in this area in this way, or discovered the views of that population on the coming CDR.

This report is built from three sources. (1) A survey and subsequent interviews conducted with the TPPs - the Fintech demand side businesses wishing to access data and provide TPP services. (2) Global research to

ensure that experiences in NZ are contrasted against the experience of other markets more progressed than NZ (3) Interviews with a range of other select market participants.

A key condition of survey and interview participation was that we would not disclose specific responses in this report, allowing participants to openly share their perspectives. To this end we have used the process to collect rich *qualitative* data, instead of typical survey processes that may focus more on structured quantitative data.

As a secondary priority for this report we have attempted to give readers new to the topic a reasonable one-stop summary of open banking in New Zealand. We note the rapid change in this area however, and that any summary we give now is very much at this point in time, as evidenced by the number of online links we have included that were published in the last few months.

We would lastly like to thank all the TPPs and other parties that provided input to this report - this is a genuinely exciting time for financial services in New Zealand and we wish you all the best of luck for your respective endeavours and look forward to hearing about your progress in 2023.

Stephen Clay

Deloitte Digital

July 2022.



Key Findings

This section summarises the findings of this 2022 report.

Current Activity in New Zealand

With New Zealand TPP fintechs poised for the 'virtual flood gate' of confirmed CDR legislation to open, we aimed to capture a snapshot of the current activity and interest that should soon evolve to be the basis for New Zealand's true, CDR-enabled, open banking activity. We examined this activity and interest across a few variants:

- Current use of 'permissioned data sharing' – being when a consumer gives a TPP permission to access data held at a bank (including action initiation), regardless of how this is currently being performed
- Current related activity that would potentially benefit from a move to CDR APIs in the future
- Aspirations for specific future activity

As above, the process in this initial Discovery-themed year was intentionally qualitative, and here we framed current activity and interest against a set of use case archetypes. Rather than being exhaustive with respect to participant numbers, we have taken current activity as an indicator of feasibility and potential market for each category, and

extrapolated that the market will naturally grow in subsequent years in terms of both scale and participation.

We captured a nicely spread range of activity, much of it encouragingly well progressed. Much of this activity was broader than the situation that will be top-of-mind for many people, of an individual customer using an app provided by a local startup fintech. We found established companies keen to expand their customer offerings by adding CDR API-enabled data access to their existing products, widespread use of intermediaries to ease the burden of data access and provide value-add services, access to financial data via companies such as Xero, numerous interesting B2B use cases, many overseas players active in the NZ market, developers of software platform products aiming to incorporate CDR API access capability into those products, and companies working closely with banks to embed their products directly into bank mobile apps.

Possibly most encouragingly, we found companies with new business models entirely predicated on permissioned access to consumer data.

The majority of current activity is naturally based on today's most commonly available channels to bank data, rather than the CDR APIs of the future. TPPs today are using a mix of screen scraping (either directly or via an intermediary), 'wrapped' mobile banking APIs (via an intermediary) or in some cases direct integration (batch or API) with banks.

The healthy level of activity we have seen validates that there is a demand for the data and the need for more controlled and managed API access in the future.

We saw a range of attitudes towards this use of screenscraping and wrapped mobile APIs, with a definite degree of normalisation and acceptance, but elsewhere still hesitancy, across both the TPPs we spoke to and, from their reports, their customers as well.

It is worth noting that all market participants we spoke to had customer safety as a key objective and embrace progress in standards which ensure customers and their data remains safe, i.e. a move to appropriately designed and implemented CDR APIs.

The knowledge that interviewees had and the opinions they stated were reassuring in being able to support robust discussion about a future CDR, though there was some variability in how well they understood the role and mandate of various entities such as Payments NZ. Interviewees demonstrated a broad understanding of the opportunities as well as the risks and challenges of balancing innovation and progress with safety.

TPP Priorities for a CDR

As well as discovering the breadth of current activity as above, another key goal of this report, and one of the calls to action to participants, was to provide an anonymous channel for TPPs and other fintechs to have their voice heard in terms of the coming CDR – what aspects they wanted to ensure were considered in terms of the approach to the CDR, the associated APIs and the rules around them, regulation and compliance, support provided, and so on. We found encouraging levels of alignment between the points that were commonly raised and many of the documented intentions to mature open banking ecosystems in Australia and the UK, and in some cases the published intentions of the NZ government.

In summary, the key points made were:

- **Clarity on next steps:** Across the bulk of our interviews and survey responses - almost universally - was a desire for clarity from the Government on the forward plan for the CDR construct: what will be done, by who, and by when. Several TPPs said they would also like a view of the controls that would be implemented to ensure timelines are met, as delayed implementations were a recognised issue for countries such as the UK and Australia. The coming draft bill is eagerly anticipated, and the consistent ask was for as much clarity as possible on the associated broader process to move the CDR forward.

- **Strategically aligned, consistent and clear approach:** TPPs noted that the move towards open data will happen within the broader context of New Zealand's evolving business and government digital landscape, and will itself also have multiple moving parts. They hoped that – especially given the lower complexity of the New Zealand environment compared to countries like Australia and the UK – a cohesive approach that aligned to broader strategies, promoted ease of engagement and was easily understood could be pursued.
- **The future Open Banking API Specification:** TPPs had a wealth of ideas about what they wanted to ensure was considered for the API specification itself, for instance support for 'real world' use cases such as joint accounts and access delegation, and controls for the quality of data returned.
- **Associated processes:** The processes for consenting and accreditation were raised many times, with cross-border interoperability and measurement of CDR benefits also raised.
- **Broader support:** sufficient education to the public on the move to a CDR and the increased safety and trust that accompanies it was a popular request, along with a general desire for any other support that could make life easier for a TPP, such as templated agreements and guides to regulatory requirements.

New Zealand's context and history

As well as a summary of steps to date in New Zealand's journey towards a CDR, in this section we have also examined the current environment that TPPs work within – the different starting point that NZ has had compared to other regions, and the history of screen scraping that supports a lot of current permissioned data sharing activity.

As part of this 'starting point' notion we note that NZ hasn't recently suffered from several of the problems that other countries have attempted to solve with open banking. Further, some reasons to use open banking such as lower fees compared to using card rails may be diluted by changes from the Retail Payment System Act. That said though, the absence of certain issues does not negate the need for progress with open banking, and simply gives NZ the opportunity to look for alternative starting points and pathways, free from the need to solve those immediate problems.

International learnings

This section provides more context for New Zealand's next steps by exploring the ways in which our two most relevant other markets – Australia and the United Kingdom – are far from reaching any kind of Nirvana in terms of open banking. We look at the remaining aspects of open banking that are yet to be addressed in each market and reflect on how New Zealand is positioned by comparison. Key points from this section include:

- Australia and the UK originally took very different approaches to open banking, with different scope across read/write access (including payments), account types covered, eventual plans to broaden past financial services and so on. Since then however, each

country has announced planned changes that will lead to similar target states with similar scope.

- Both the UK and Australian open banking rollouts have suffered from banks missing regulator compliance deadlines
- The Australian accreditation model should generally make a suitable base for New Zealand to build our model out from, albeit with upcoming changes to accommodate action initiation when this is added to the Australian CDR.
- New Zealand is well-placed to learn from the UK and Australian journeys – most of what is typically envisaged for New Zealand has been proven to work to some degree by at least one of these countries. While starting behind these other markets, there is a real opportunity for New Zealand to move quickly, leverage their experience and catch up. Operating at our smaller scale there is potentially no reason New Zealand shouldn't be able to overtake Australia and the UK and become world-leading in this space.
- We also looked briefly at the situation in the United States. While the US open banking ecosystem has famously grown via a purely industry-led approach free from regulation, there are now changes planned to introduce regulation in answer to a range of issues.



New Zealand's Context

This section describes the journey to New Zealand's current point of awaiting draft legislation for the upcoming Consumer Data Right, and for further context the progress that has been made in permissioned data sharing to date, outside of a formal CDR.

The Journey to Date

Minister Kris Faafoi had previously given a direction to the NZ financial services industry that a move towards open banking should be self-directed, [re-iterating](#) his support for this approach at the launch of Payments New Zealand's API Centre in May 2019.

In December 2019 however Minister Faafoi [released an open letter](#) to API Providers (banks) listing a set of concerns about a lack of progress and saying that he had "directed my officials to provide me with advice on a possible Consumer Data Right in New Zealand".

The Minister's concerns centred around a lack of progress in New Zealand banks implementing the API Centre's [API Standards](#) across both Account Information and Payment Initiation, a vital aspect of progressing the self-directed approach. Reported bank progress against these API standards continues to be variable and can be seen [here](#).

In August 2020, MBIE [released a discussion document](#) *Options for establishing a consumer data right in New Zealand*, receiving [59 submissions](#), from across industry.

David Clark replaced Kris Faafoi as Minister of Commerce and Consumer Affairs in November 2020, and in July 2021 [confirmed the government's intention](#) to introduce a CDR to New Zealand, with an plan to introduce legislation in 2022. In that announcement Minister Clark made two interesting points:

- *"It's also my intention that the consumer data right will work hand-in-hand with the Digital Identity Trust Framework announced earlier this year. It's that piece of work which sets out the rules for the delivery of digital identity services"*
- *"The consumer data right will be rolled out on a sector-by-sector basis to ensure that the detailed requirements work in practice. We will look to align our system with the Australian model introduced in 2019"*

[Minutes](#) released from the Cabinet Economic Development Committee three days later give some further detail on the direction the government intends to take for the CDR, particularly that

- *"consumers can include individuals and entities" (i.e. businesses will be in scope for CDR as well as individuals), and*
- *"consumers will be able to consent to read access (i.e. the ability for an accredited person to receive consumer data) and action initiation (i.e. the ability for an accredited person to carry out an action on the consent of a consumer)" (i.e. both 'read' and 'write' access are in scope, in contrast to the initial Australian CDR, which had a heavy emphasis on 'read' use cases, and which is only now being built out to include 'write' functionality, including payment initiation and 'switching'*

With the CDR legislation expected to be introduced to Parliament during 2022, parties across the open banking ecosystem are eagerly awaiting the release of a draft version.

The inherent broadness of a multi-sector-scoped CDR points to it still being some time after the initial legislation is released before we have clarity on the key shared open banking-specific questions described throughout this report however, and in fact while banking is widely expected to be the first sector addressed by the CDR (as it was in Australia) this is actually yet to be confirmed.

It is also still to be confirmed exactly which 'open banking' processes (especially with regards to payments) will fall into the scope of a CDR and which may remain to be treated outside of it. While CDR details from the government to date have generally not mentioned payment initiation, it is explicitly referred to [here](#).

"Action initiation will allow consumers to, for example, ask a third party payment provider to action a bank funds transfer from the consumer's bank account to a business's bank account when paying for a goods or services." And this provides comfort that the assumption being broadly made about payments being included within 'action initiation' is correct.

Given the differing approaches taken in overseas markets (the UK, driven by the PSD2 directive to be focused primarily on payments, at least initially; Australia, initially contained to read access, but aiming for a broader industry remit and now moving to write access) it will be very interesting to see how broad or narrow the New Zealand government makes the CDR scope.

The move to a New Zealand CDR happens against a backdrop of several other exciting strategic changes to the New Zealand financial landscape:

- [A lowering of Cards fees](#), implemented via the [Retail Payment System Act](#) – potentially reducing the advantage of moving to open banking payments on the basis of lower fees, compared to Cards.
- Payments NZ [Payments Direction initiative](#) – including moves to 365 day a year and then real-time payments, which will directly impact payments initiated through open banking APIs when they are delivered
- Reserve Bank [Future of Money Initiative](#).

Progress Outside of a CDR

Bank integration without APIs

Aside from any formal CDR construct, New Zealand businesses have had a relatively long history of providing value to customers using permissioned access to information held at banks, including payment initiation.

New Zealand therefore approaches this move towards open banking from a different starting point than many other countries, and in many cases the problems that open banking has been intended to 'solve' overseas are not ones that NZ has particularly suffered from in recent years.

For years New Zealanders have had the ability to

- digitally share banking transaction histories for mortgage applications, general credit decisioning and the like, without having to locate and upload individual files or scan paper, via services like

bankstatements.co.nz

- pay friends or merchants over internet banking
- pay various merchants online without a credit card, via POLi or Account2Account
- use the 'switching' team at a new bank to bring all their existing automatic payments and direct debits across from a previous bank
- more recently, pay from a bank mobile app 'to a mobile number'

Arguably, these have been fairly basic treatments of these use cases – as noted later, mobile banking payments have not universally become easy enough to pay a busker on a whim, and the 'simplified switching' envisaged for the Australian CDR is a world away still.

In recent years, the presence of intermediaries, particularly with support for 'write' access, has helped to greatly expand the range of activity to what we describe in the *Data Sharing Activity Snapshot* section.

A lot of activity to date has typically relied ultimately on 'screen scraping', which involves machine-to-machine engagement with bank internet banking websites, with the TPP either integrating via an intermediary or directly. More recently, wrapped mobile banking APIs have been introduced as an alternative, through an intermediary.

Screen scraping (also known as Digital Data Capture) while internationally very common, does require banking credentials to be disclosed to a party other than the customer's bank, which [typically contravenes the bank's terms and conditions](#). The practice has been the source of a significant amount of debate in Australia, but in 2020 ASIC said it was not aware of any instances of consumer loss related to it, and the [ACCC said it did not plan to ban the practice](#) while the Australian CDR is being developed, with an expectation that with a full CDR available screen scraping should become a lot less common.

Widely known services that use screen scraping in New Zealand include POLi Payments (ultimately owned by Australia Post), [Windcave's](#) (formerly Payments Express) Account2Account, [illion](#) and [CreditSense](#). These companies make good arguments for the security of their platforms, stating they never store log in credentials, have a range of security measures in place and have appropriate certifications. The question of overall risk is [frequently dealt with online](#).

There is currently a wide range of opinions on screen scraping, across consumers, intermediaries and TPPs. With long-standing use in the New Zealand market (POLi having operated in NZ since 2008) there has been a degree of normalisation of its use. Many less-technical consumers, of course, will not realise that there is any question of risk at all. During our interviews we heard from TPPs whose customers ranged from gladly using a screenscraping-based service, to refusing to, and opinions among TPPs range similarly. We spoke to both TPPs who happily underpin their products with screenscraping for bank integration, as well as those who do not trust

the technique and will wait for bank APIs to be available before integrating with banks. An interesting nuance to using screen scraping we heard from interviews was around communicating to an existing customer base that a new function being introduced would require the customer to enter their banking credentials, and what that means for the relationship and trust between the company and their customers. Once open banking APIs are available these questions may obviously become irrelevant.

In summary, screenscraping is a technique that has been used in New Zealand for several years, with no instances of compromises that we know of. As with all online activity, consumers should be informed and take a risk-based approach. We expect over time most uses of screen scraping to transition to open banking APIs.

Payments NZ

[Payments NZ](#) governs New Zealand's core payment systems and works with the industry on the future direction of payments for NZ. Within Payments NZ, the [API Centre](#) coordinates the ongoing development, management and governance of payment-related API standards, and provides supporting services.

The API Centre has published Payment Initiation and Account Information API standards, currently at version 2.1. It was this set of [standards](#) that Minister Faafoi expressed concern about the pace of the banks implementation against in his open letter of December 2019.

New Zealand will soon be in the unique position of being the only country to implement a CDR with an existing set of standards in place. The government's intentions for leveraging the API Centre standards as some part of the coming CDR are not confirmed at this point.

A key focus for Payments NZ is the strategic Payments Direction initiative, which includes the work to modernise the country's payments systems, including moves to [365 day per year](#) payments and subsequently real-time payments.

In our TTP interviews we found varying levels of understanding of Payments NZ's role and mandate within the New Zealand financial system.

Overseas Markets: Progress and Lessons

In this section we provide an overview of open banking progress to date for the two regions most obviously comparable to New Zealand as we move towards a formal CDR, the United Kingdom and Australia.

We also touch on the United States, but without the same level of depth, due to activity there not been driven by CDR-style regulation.

United Kingdom

The United Kingdom is rightly recognised for having made great progress with open banking. An [official website](#) shows impressive growth over time of API use and successful payment initiations, with over 4.6 million payments in the month of April and more than 2 Billion GBP collected in UK tax by HM Revenue & Customs via open banking overall.

The UK Open Banking construct is a response to the Payment Services Directive 2 (PSD2), which was introduced in 2015 across the European Economic Area (EEA). PSD2 aims to encourage competition and innovation *specifically in payments*, while improving security and preventing fraud. The

specific UK approach is managed by the Open Banking Implementation Entity (OBIE), created in 2018. It is mandatory for the largest nine UK banks to open their data to third parties in a standardised way. Open banking payments settle in real time, using the Faster Payments network.

The situation is yet to achieve any kind of Nirvana however, with limitations still to be resolved and challenges along the journey to reach this point.

- There have been delays, including a majority of the 9 biggest banks [missing the deadline](#) for the initial API rollout.
- The account types within scope for open banking are limited, reflecting the payments-oriented heritage of the regulations that gave rise to open banking in the UK. The scope covers mainly current accounts, and a subset of credit card and savings accounts. This is a narrower scope than, for instance, Australia where loans, mortgages and term deposits are also in scope. This makes it difficult to derive a full financial picture of a consumer via open banking, limiting usefulness for many use cases.
- Consumers can currently only initiate single payments, each one requiring separate authentication with the bank. The proposed solution involves introducing 'Variable Recurring Payments'. These will initially be just between a single customer's accounts ('me-to-me', 'sweeping'), aimed at resolving current inefficiencies in these fund movements requiring direct debits. Sweeping will be regulated as free, but commentators have noted that there is currently no

guarantee that wider use in payments to another party (e.g. paying a monthly utility bill) won't be able to be charged for.

- In June 2020, the European Banking Authority (the PSD2 regulator) demanded parity between certain online banking experiences that banks provide directly to their customers, and the service they provide through PSD2 APIs, threatening fines for a failure to comply.
- Consumer protections or niceties that are commonly provided by Cards such as refunds and standing orders are not available in open banking and bridging that gap has become a priority.
- A change from consumers *re-authenticating* consent every 90 days to a much more lightweight *reconfirmation* has very recently been [introduced](#). This is referred to broadly as the '90 day rule'. Under the old rules there had been massive drop offs in use past the initial 90 days, due to the effort required from consumers for the heavy re-authentication process.

Even with these shortcomings and ongoing challenges, the UK market boasts a good provisioning and uptake of services across many open banking use cases:

- Account Information Services (AIS)
 - Smart onboarding (account and identity verification, auto-filling forms, income verification and affordability checks).
 - Personal finance management (finance dashboards, auto-saving, smart budgeting).
 - SME finances (account aggregation, automated accounting and affordability checks).
- Payment Initiation Services (PIS)
 - Top ups to accounts on platforms for e.g. wealth management, investment and gambling
 - Payment of tax

Intermediaries in the UK market such as TrueLayer and Plaid have added value in a number of areas, such as:

- UK Banks have exposed the mandated set of APIs, but in many instances expanded upon these with additional proprietary APIs. The differences in the proprietary APIs between banks has created an opportunity for intermediaries to ease the burden on TPPs of consuming these differing APIs by hiding the complexity and presenting single consistent services to the TPPs.

- Challenges have been noted in how e-commerce providers can use open banking, due to the mechanism being a one-way rail, and given the requirement to give refunds back to the customer's original account. Some intermediaries have developed solutions for this problem.

Unlike in Australia where financial services is intended to be just one segment within a broader Consumer Data Right construct, PSD2 was specifically targeted to financial services without a broadening to industries such as telco designed into the overall approach. It is now expected that the UK will broaden beyond PSD2's focus however and include use cases from these other industries, widening the catchment of industries via its [SmartData](#) construct, which includes finance, energy, pensions and communications. This broadening may amplify the challenges of integrating other regulations such as GDPR that have already been identified as problematic.

Published in October 2021, the [Payments Landscape Review Response](#) to the Call for Evidence outlines specific government priority areas as being:

- Ensuring the Faster Payments network provides the right level of protection for consumers to address what happens when a payment goes wrong
- Unlocking safe and secure Open Banking payments in shops and online rather than consumers using credit or debit cards
- Enhancing cross-border payments
- Future-proofing the legislative and regulatory framework for payments



Australia

Still maturing

Australia is still very much on the journey to realising the potential of the CDR it originally introduced in 2017. [The ACCC provides an excellent overview](#) of progress to date including a timeline. As for the UK, Australia is still far from reaching a Nirvana.

As described below, the rules of the CDR are being evolved towards a fuller and more useful construct than with the initial read-only scope. While significant progress has been made, the supply of data by banks has been challenged and required [ongoing exemptions](#) and the ACCC recently released a warning about [data quality](#).

While the way Australia has defined and evolved its CDR will have a major influence on the approach New Zealand takes, even with that example the details of the New Zealand CDR will be far from a fait accompli. To recognise some of the decisions New Zealand will need to make it is worth reflecting on the overarching similarities between Australia and the UK in terms of where they started from and the different paths each country has taken since, but then also the more recent moves across both these countries to progress towards a seemingly converged destination.

Australia and the UK started their journeys with some key similarities in initial intent:

- The main purpose of open banking regulation in both the UK and Australia is encouraging competition
- Taking a regulated approach to the ecosystem and its key participants vs the current less-regulated US approach,

- Defining a standardised way for banks and third parties to connect (with defined API specifications)
- Making the providing of these connections by banks mandatory.

Differences between Australia and the UK show that individual regulated markets can easily diverge however:

- Australia's approach was to support 'read' access only, and not include Action Initiation. This is set to change now however, with action initiation (including payments and switching) currently under consideration (see below)
- From the outset Australia's intention was for its CDR to eventually be broader than just banking. As PSD2 is specifically a *payments* directive however the UK scoped its initial approach more narrowly, with a focus on banks. The UK is now set to widen the segments in scope via its SmartData construct, as noted above.
- Australia has not specified limitations on the types of accounts in scope for data sharing in the way the UK has. This makes sense when the different intentions of the regimes are considered: the value of Australia's read-only approach would be severely limited by incomplete datasets covering only some of a consumer's accounts, while complete account coverage would not have been required to satisfy the UK's original intentions and yet would have added to the amount of work required by banks to expose the required APIs.

This move by both countries now to broadly align their targets appears to suggest that NZ should consider the scope of this shared destination from the outset of our own journey.





Immediate Plans

The Australian government has provided some encouraging detail on its intentions for broadening CDR scope, taking it closer to a broad alignment with the UK as above:

Treasury's [Strategic Assessment: Outcomes report](#) from Jan 2022.

- Recommendation 1 of this report points to an encouragingly expansive and far reaching vision for the role of a Consumer Data Right in Australia: *"CDR can be the 'central nervous system' of Australia's data economy"*. In particular, this includes a point that the Australian system should continue to evolve: *'A CDR framework that adapts to the changing needs of Australians will create a digital economy for Australia that works for individuals and businesses'*
- Confirmation that across the wide group of possible datasets to address next after banking, (e.g. agriculture, education, and health), open finance was the clear priority, with access to general insurance, superannuation, merchant acquiring and non-bank lending service providers in scope for this.
- Inclusion of consumer data held by government will be a further priority. The report recognises the complementary nature of this data and crossover to how private sector goods and services are supplied, and the possibility that those private sector concerns are improved as a result of making the data available.

December 2021's [Government Response to the Inquiry into Future Directions for the Consumer Data Right](#) article addresses the 100 recommendations listed in the [Inquiry into Future Directions for the](#)

[Consumer Data Right](#) document, either agreeing, disagreeing or agreeing in principle to each recommendation and providing further commentary. Important areas agreed with include:

- General 'action initiation', accompanied by changes to the accreditation regime to provide necessary safeguards. Controls will also be introduced so that the available actions are 'relevant to the provision of a service'. Actions will cover areas such as managing customer information and products, product applications, and establishing relationships with new customers.
- Within the actions, Payment initiation was specified for the banking sector, with a dedicated roadmap to be created
- 'Switching' support is explicitly referred to.
- A stronger tie-in to digital identity, especially in terms of KYC and AML: 'the application of the CDR will be extended to allow sharing of KYC outcomes'
- The government agrees that Australia should 'approach the United Kingdom with the prospect of creating a mutual bilateral recognition regime', noting the importance of privacy and security concerns. This aligns with the desire for cross-border interoperability noted by some of the New Zealand TPPs we interviewed.
- On the topic of engagement with New Zealand during our CDR design process, the government agreed, however the response detailed existing mechanisms rather than implying that there would be an increase in this

Payments

The introduction of payments will be a huge change for a CDR regime that was originally introduced as read only. The [New Payments Platform](#) was introduced in 2018 to provide real-time clearing and settlement. It had long been assumed to somehow eventually 'fill the gap' with respect to payments and the CDR. A service called [PayTo](#) has now been introduced as part of NPP and is likely to play a role in how payments are made via the CDR.

Aside from inclusion within a formal CDR however, Australia has a number of fintechs who currently provide payment functionality, including [Zepto](#) and [Cuscal](#).

Intermediaries and Screen scraping

A great deal of activity in Australia appears to still be dependent on screen scraping rather than CDR APIs, as evidenced by the level of debate on the topic. ASIC and the ACCC [recently allowed for its continued use](#) with an assumption that that will materially reduce over time as CDR API methods become more consistently available.

Use of intermediaries is very prevalent in Australia with a number of large international players such as Truelayer and Envestnet Yodlee having a presence, as well as local offerings such as [Basiq](#) which Visa invested in in late 2021 and [Frollo](#).

Interestingly, as well as the more widely known use case of a TPP engaging with an intermediary to supply access to data holders, the inverse case is

also common in Australia, with companies like [Biza](#) and Frollo [being used by banks](#) to provide the outward facing APIs for TPPs to consume (directly or via a separate intermediary)

Given the large amount of activity still dependent on screen scraping, our hope would be that TPPs are insulated from a lot of the redevelopment effort when things move more fully to CDR APIs by the intermediaries being able to redirect 'the plumbing' the TPPs use, en masse.

There are examples of value-add services being provided by specific intermediaries, for instance Basiq has [very recently announced](#) a payments capability using dedicated payments specialists Zepto.

Details of the Australian CDR API are [easily accessible online](#).

United States

The United States has famously built an ecosystem of players interacting across a range of open banking-style use cases, all via a market-led approach and without material government involvement. Plaid's well-known statistic that "[1 in 4 US adults has connected a financial account to an app with Plaid](#)", is staggering, especially given this is for a single intermediary among many. As this growth has not been conducted under regulation we have not assessed the current state of the US as deeply as for the UK and Australia.

This market-led approach has, inevitably, resulted in many inefficiencies and concerns. Concerns about ongoing use of screen scraping continue, however this is being remediated in pockets, with Plaid stating an aim to [convert as many of their bank connections to APIs](#) as they can, as quickly as possible.

There have been some industry-led moves towards standardisation, with [Akoya](#), owned by some of the country's largest banks, championing a set of standard APIs.

While to date the US has had no formal regulation in the way that UK and Australia have, this may be set to change. The Consumer Financial Protection Bureau (CFPB) is acting under White House direction to introduce open banking regulations to the US. These have been delayed due to privacy concerns over the way data could be handled, in light of how Big Tech companies have [come under fire recently](#).

A desire to move towards a more regulated approach had been voiced as early as 2018, for instance in a [report](#) by the US Dept. of the Treasury. Overall, the complexity of dealing at the levels of both state and federal legal constructs across this issue has been identified as a risk.

Interesting times are certainly ahead for open banking in the US, with an API approach potentially supporting the range of functions unavailable from screen scraping that Australia is currently considering, such as switching.

Reflections for New Zealand

In light of this activity in Australia, the UK and the US, how is New Zealand now positioned to move forward with our CDR?

Hopefully well.

Nothing indicated from the government to date has shown that we are likely to restrict our CDR scope in the ways either the Australian or UK regimes have. If this is true then NZ would appear to be aiming roughly for where they are now also going, however with the benefit of doing that from 'day one'.

New Zealand, of course, has by comparison with these other markets several factors that should make our journey more manageable: a small market scale with a small number of data providers, and no complexity of state vs federal laws. We are starting from an arguably better position in terms of available banking technology as well, compared for instance with the need for UK transfers between a single consumer's account having to go via direct debit being highlighted by the introduction of 'me-to-me' sweeping.

Across the UK and Australian markets, taken in totality a sizeable portion of what New Zealand is likely to want to achieve has been proved as feasible to some extent. In particular we will have a road-tested model for accreditation from Australia to build ours out from (albeit with changes still to come in Australia for action initiation), and some key learnings around consenting given the change in the UK to the 90 day rule.

In the *Data Sharing Activity Snapshot* section we cover existing activity in NZ likely to evolve into the basis of our open banking ecosystem. While

the US is bringing regulation into an existing market and could potentially have problems 'unpicking' some of what is already in place, we cannot see any evidence that NZ has 'progressed too far' on any front and would have any similar problems

International intermediaries have displayed their appetite to work across borders, and chances are decent of more of these joining Investnet|Yodlee, who have supported the NZ market for several years.

In general then, while starting behind these other markets, there is a real opportunity for New Zealand to move quickly, leverage their experience and catch up. Operating at our smaller scale there is even no reason New Zealand shouldn't be able to overtake Australia and the UK and become world-leading in this space.



Why APIs?

The majority of online definitions of 'open banking' reference the use of APIs. Some explanation of why these provide enough benefit to be mandated for use in preference to other methods of data access may be of help, especially to less-technical readers.

What is an API?

APIs, or Application Programming Interfaces, are one of the de facto modern standards for integrating technology systems. Full technical explanations are readily available online, but for the purposes of this report an API can be considered as being analogous to a virtual electronic storefront that a computer system exposes to other computer systems, in order to accept requests of specified format to return information or perform a task e.g. "GET me all the transactions related to this customer ID for the month of June", "GET me the current balance for this account", or initiating a payment.

To claim that APIs are preferable - in particular for the open banking uses we are interested in - must be done specifying what they are preferable to: compared to screenscraping, or to traditional methods such as bulk file uploads, direct debits, payments via cards, payments initiated by a customer over internet banking etc

These benefits are peppered throughout relevant sections of this report, but summarised here.



Preferable to 'traditional' methods

A lot of functionality is possible with either screenscraping or APIs, although 'write' access is out of the risk appetite of some market players. The benefits listed here should be available via either method.

- Read access to an account allows the TPP or their intermediary to 'look inside' the 'black box' of that account, and act according to the state of the account:
 - Only initiating a payment when the account balance is sufficient
 - Knowing when a consumer's salary has arrived in their account, and acting then
- As the initiator of a payment (having been given permission by the consumer), the TPP immediately knows the outcome of a request and can act accordingly (requires write access):
 - a wallet within an app can be topped up immediately, even while waiting for the actual funds to traverse the banking system
 - amounts to use for transactions can be calculated on a range of inputs: average salary, account balances (e.g. for sweeping cases), amount spent at certain merchants etc
- Also, as the initiator the TPP is not as reliant on their customers entering details for the transaction which risk being mis-keyed, as they are for traditional methods. The bulk of details should be known to the TPP when they submit the initiation request as they should be items of data on the TPP's platform. There is reduced need for reconciliations of amounts received by the TPP as they initiated every

payment and know the outcome of each (requires write access)

- Reduction in costs per transaction, compared to using Cards systems. This was very commonly mentioned by the TPPs we spoke to as the main reason for their interest in moving to payments over API in the future. There is an expectation of moving to a system of small fixed fees per API transaction rather than a percentage, which would benefit companies with larger sums per transaction, and those with smaller profit margins. (requires write access)

There are a set of acknowledged downsides to using APIs compared to cards, including a lack of [chargebacks](#); no 'free' insurance when booking plane tickets; no loyalty scheme rewards and no cash flow benefit in terms of credit card cycles.

Preferable to screenscraping

We note that screenscraping, including by intermediaries, is still incredibly common in overseas markets, including [still being dominant](#) over API use in the unregulated US market. That said, APIs have the following benefits compared to screenscraping.

- Screenscraping is limited to the functionality offered by the system being integrated to, most commonly an internet banking website that was never designed to be used in any manner other than directly by a customer, through a web browser for a discrete set of tasks. Full APIs, designed with the express purpose of supporting open banking can offer a much broader range of [functionality](#), including enduring consents, switching etc.
- An API approach will not require consumers to enter internet banking credentials into a system other than their bank, increasing

the trust and faith in the system. Under a NZ CDR, use of the APIs will have publicised government support, further increasing trust.

- API use will be backed by formal, bilateral agreements between the bank and consumer of the API (which could be an intermediary, on behalf of their customer, the TPP), so that any responsibilities or risks associated with use are formally documented.
- Less fragile: changes to the website being scraped can break the ability of screen scraping software to perform as required. Ongoing maintenance of screen scrapers to ensure they keep working against systems that could change at any time, updated by banks that the screen scraper typically has no formal agreement with, is costly and time consuming. Banks in the US are reputed to have gone through a period of intentionally changing internet banking websites in order to break screen scraping functionality.
- More efficient: consumers of an API need only code for one standardised method of interacting with multiple banks, and not replicate effort across each separate bank website. Currently intermediaries hide a lot of the complexity of dealing with multiple banks from the end TPP using the services, who typically just see a standardised API across all banks.
- Less risk: some intermediaries choose not to use 'write' functionality such as payment initiation through screen scraping, believing the risks outweigh the benefits. With APIs this would cease to be an issue
- Organisations that manage the evolution of APIs will often publish roadmaps of future planned functionality for those APIs, allowing consumers to do their own technical planning as well.

What is an Intermediary?

In summary, the purpose of an intermediary in the context of open banking is to allow many different TPPs to access data and services from many different banks. This 'many-to-many' model means complexity and problems can be addressed centrally by the intermediary for the benefit of all involved. Clean, consistent, working APIs can then be exposed to the TPPs, who can get on with the job of providing business value to their customers, rather than fixing 'plumbing'. The details of the intermediary's integration with each of the banks can differ, including use of screen scraping or APIs to access different banks, or even in combination with a single bank if required.

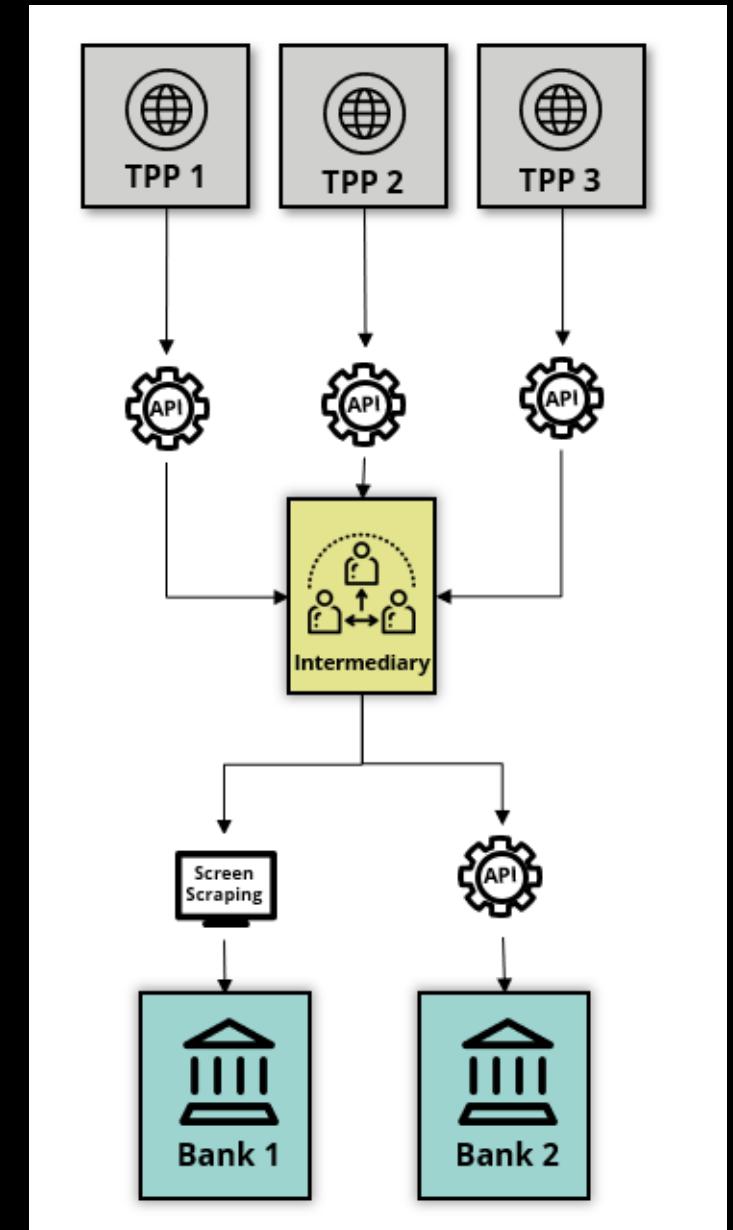
In addition to acting essentially as a 'pass through' of services from the banks, an intermediary can also add value by providing commonly required functionality centrally as a service, rather than each TPP having to develop it independently. Examples of these could include calculations, comparison of single customer values with averages and so on. Transaction enrichment (see *Data Sharing Activity Snapshot* section) is another example.

Intermediaries are very commonly used in overseas markets. This is widely known, and many NZ TPPs we spoke to said they believed even though NZ has relatively few banks that cover the large majority of customers, there was still definite value in intermediary services, and they didn't foresee themselves attempting to integrate without an intermediary, especially in light of typically small TPP development teams.

Examples of intermediaries include Plaid, Tink (acquired by Visa in March 2022), Envestnet Yodlee, Salt Edge, TrueLayer, Basiq (An Australian company, invested in by Visa in 2021), New Zealand's Akahu, and recent MasterCard acquisitions Aiiia and Finicity.

Additional problems that intermediaries 'solve once' on behalf of all the TPPs using them include:

- Ongoing maintenance of the connection to each bank, which in many cases will still be via inherently fragile screen scraping that needs regular maintenance to ensure it keeps working, given banks can change their internet banking sites at any point
- In regions such as Australia, and soon to be in New Zealand with the introduction of our CDR, intermediaries can reduce the compliance burdens on their TPPs, by having the 'unrestricted accreditation' that lets TPPs source bank data via a model such as CDR Representative that requires a less onerous accreditation from the TPP.
- Intermediaries can offer single points of control for consumers across any mix of the TPPs and banks the consumer has used, to view and control the permissions they have granted and easily revoke them – Plaid's [Plaid Portal](#) supports this, as does Akahu's My Akahu.



In Profile – Akahu



Akahu is an intermediary that provides open finance infrastructure specifically for New Zealand.

Akahu's core service is account connectivity. End users can use Akahu to connect their financial accounts to a 3rd party product, which can then programmatically interact with those accounts.

Akahu's app customers use this connectivity to recreate bank account functionality in their products. Akahu supports a broad range of functionality, with the most popular being:

- Payments: initiate one-off or recurring payments.
- Transactions: retrieve a unified and enriched stream of transaction data.
- Accounts: retrieve account details, such as balances, interest rates, and expiry dates.

- Identity: verify an end user's identity and ownership of accounts.

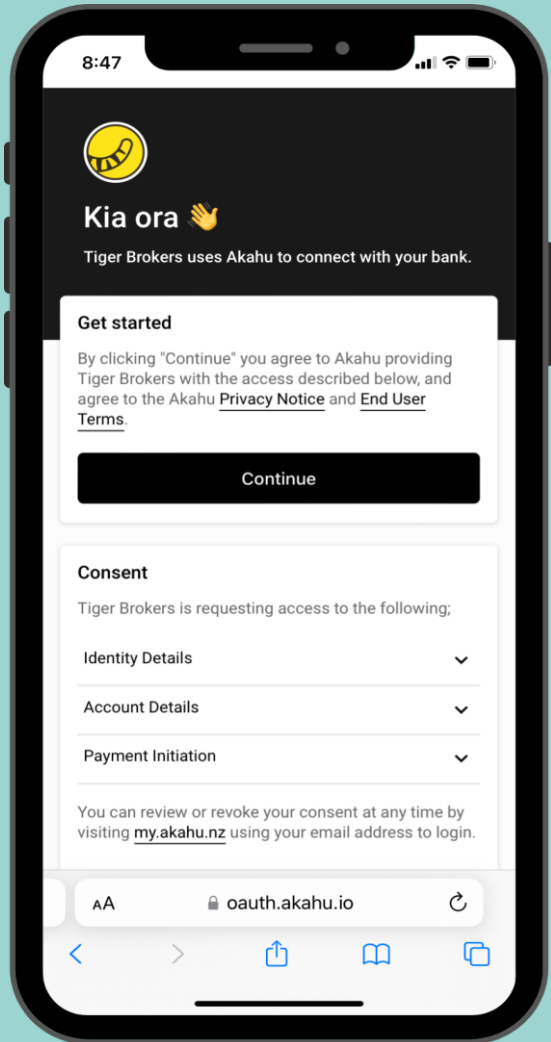
Akahu's journey began when Ben Lynch was working in the bank feeds team at Xero in 2013. He grew frustrated with the unreliable intermediary data integrations that were used to fetch transaction data into Xero, and decided to build integrations for his personal bank accounts.

That side project turned into a full time project called Jude, where the data integrations were used to power features like account aggregation, round-up, and sweeping.

Then In December 2020, the data integrations were transferred into a new company called Akahu, and became available as an API product to external developers. Westpac announced an investment in Akahu at that same time.

Akahu currently has over 25 app customers delivering use cases in production environments. Examples include:

Tiger Brokers and Sugar Wallet, investment platforms: Using Akahu to retrieve balances, initiate payments, and verify the identity of end users.



1. PaySauce and PayHero, payroll providers: Using Akahu to check balances and initiate payroll payments.
2. Cloudcheck and RealAML, identity verification providers: Using Akahu to verify the identity and bank accounts of end users.
3. Pocketsmith and Kubera, personal finance tools: Using Akahu to retrieve transaction and account data.
4. Dolla and Bankroll, payment apps: Using Akahu to check balances, initiate payments, and verify the identity of end users.

With its sole focus on New Zealand, Akahu aims to be the intermediary of choice for local products. And for international products like Tiger Brokers and Kubera that have a subset of New Zealand end users, Akahu aims to be the intermediary that's selected for those New Zealand connectivity requirements.

There are also 250+ "personal apps" using Akahu for non-commercial use cases. For example, developers that are tinkering away on a fintech idea, or people who want data feeds for their own personal financial management tools.

Akahu describes their differentiation from other intermediaries in New Zealand as follows:

- Enduring connections: Other intermediaries in New Zealand use "screenscraping" to connect to banks via their web apps. Akahu instead connects via the mobile APIs of the banks. These API connections are more reliable because they don't break when banks make updates to their web apps. And they're more secure because Akahu can generate a long-lived token instead of storing the end user's username and password.

- Read and write access: Akahu provides both payment initiation and data feeds. We're the only intermediary in New Zealand that offers ongoing payment initiation functionality.
- Transaction enrichment: Raw transaction data usually isn't sufficient for use cases like loan applications and loyalty schemes. So Akahu allocates significant resources to enriching the raw data and making it useful for app customers.
- Local focus and support: Akahu is solely focussed on providing open finance infrastructure for New Zealand. That geographic constraint means that our team puts all of our effort into supporting local integrations and app customers.
- App accreditation: Our accreditation process helps to assess whether each app can deliver real value to users, and can manage the responsibility of handling sensitive data.

Akahu report plans to remain exclusively focussed on providing open finance infrastructure for New Zealand. They plan to extend their core offering to include more "shared services" on top of connected accounts, such as:

- Income enrichment.
- Name and address matching.
- Subscription management.
- Infrastructure-as-a-service to make it faster and easier to build fintech apps.

Key Friction Points With Open Finance: A View From the Coalface



Josh Daniell – CEO, Akahu

Is this another wafty opinion piece?

No. This article identifies 5 key friction points between open finance stakeholders, and presents some spiky views on how these issues should be addressed.

A quick introduction

I lead the team at Akahu - an intermediary that provides open finance infrastructure for New Zealand. We give consumers a simple way to connect their financial accounts to trusted products. To deliver open finance infrastructure, we maintain a suite of data integrations with financial institutions. This work began in 2013. Over the last 9 years, our team has had a front row seat as open finance has developed in New Zealand. Let's get into the nitty gritty.

Friction point #1: Whether API Centre standards should be folded into Consumer Data Rights

In the late 2010s, pressure started mounting on banks to "open up" and make APIs available to customers. This pressure came from international

trends, and from products like Xero where customers were clearly seeing value from having connected bank feeds.

The major New Zealand banks own a company called Payments NZ (**PNZ**), which is tasked with managing payment clearing systems. In 2018, work began to develop common API standards for New Zealand, and this work transitioned to a new PNZ subsidiary called API Centre in 2019. A generous interpretation is that the banks wanted to proactively develop open banking in New Zealand for the benefit of consumers. A sceptical interpretation is that the banks wanted to proactively develop open banking to control the process and avoid the rules being dictated to them through legislation.

Then the Government turned up the heat. In late 2019, the Minister of Consumer Affairs [warned banks](#) of "concerns that the current pace and scope of progress risk not delivering the full benefits that could be realised with open banking for consumers". In 2020, the Government began public consultation around potential "[consumer data rights](#)" (**CDR**), which would set legislative account connectivity rules for banking and other sectors. In 2022, the Government [confirmed](#) that it will implement CDR.

Now that it's clear that rules will be set through CDR, the banks are advocating for the API Centre standards to be folded into CDR.

I agree that CDR should largely adopt the latest version of the [API Centre standards](#). It makes sense to leverage the good work that's already been

done by API Centre to develop these standards, and by some of the participating banks that have been developing APIs to meet them.

But some aspects of the standards need to be changed. For example the payment consent rules require the destination bank account to be defined at the time a consumer grants consent. This excludes some valuable use cases that have sprung up overseas such as peer-to-peer payments, payouts, and marketplace payments.

We should use the API Centre standards as a starting point for banking CDR rules, but should make sure to understand and correct any aspects that will prevent important use cases.

Friction point #2: Who will be the governing bodies for CDR

There's an open question regarding the entities that will govern CDR in New Zealand.

In Australia, where a similar CDR regime began rolling out in 2020, the responsibilities are shared across the Office of the Australian Information Commissioner (OAIC), the Australian Competition and Consumer Commission (ACCC), and the Data Standards Body (which is part of Treasury).

I don't have a strong view on who should govern CDR in New Zealand. But here are the important attributes:

- The standards should be developed by a Government entity that can demonstrate arm's length independence from industry and focus on the interests of consumers.
- This work will require specialised knowledge, so it makes sense to build up this capability in a single Government entity rather than duplicating across multiple entities (like in Australia).
- We should use existing frameworks and entities where appropriate. For example if the accreditation rules include dispute resolution requirements, it makes sense to use the existing dispute resolution schemes.

Friction point #3: Whether Government will take a stance on traditional methods of account connectivity

I think it'll be about 3 years before CDR offers a viable connectivity option. This rough estimate is based on time required to:

1. Enact the primary CDR legislation.
2. Designate and write detailed rules for the first sector (which I've assumed will be banking).
3. Enable data holders to build APIs to meet the detailed rules.

API compliance deadlines may be phased in over time, like in Australia and the UK. If that's the case, then it may take even longer for CDR to cover

payment initiation, joint accounts, business accounts, and other functionality that tends to be pushed back into later phases.

While we wait for CDR to rollout and mature, there are 2 traditional methods to deliver account connectivity that don't rely on purpose-built functionality from banks:

1. Screenscraping web apps: This is widely used in NZ for home loan and personal loan applications, one-off online payments, and personal finance apps.
2. Reverse engineering mobile app APIs: This is how Akahu provides connectivity for enduring access use cases like recurring payments and ongoing data feeds.

People grumble about these traditional methods, because they require consumers to share their login credentials in order to connect their accounts. The grumbings are fair - sharing login credentials is a suboptimal solution, and it means that consumers need to have high trust in the intermediary and the product they're connecting their accounts to. The problem is that there's no better alternative available in New Zealand yet.

In Australia, the topic of screenscraping and reverse engineered integrations was explicitly discussed in Senate hearings as the Australian CDR rules developed. Australian regulators made it clear that there was no intention to restrict or block those existing methods, and that gave fintechs more confidence to get started or keep going, rather than waiting for CDR. I think that the Government should take a similar public stance in New Zealand.

That's a self-serving point, given that most of Akahu's account connectivity relies on these methods. But here's why I think it's a defensible position.

First, these methods have operated in New Zealand for over a decade without evidence of consumer harm. Estimates run as high as [1 in 3 Kiwis](#) having used a screenscraping service. For example:

- Some banks use these methods to automate online loan applications. All retail banks use these methods in their supply chains - around 50% of home loans are originated via brokers, and most of these application processes use screenscraping to collect the data.
- POLi and account2account are widely-used products that use screenscraping to initiate a one-off online payment. Over 4,000 merchants use these services including The Warehouse, PB Tech, Mighty Ape, Spark, Bunnings, Air New Zealand, Auckland Council, and Waka Kotahi (NZTA).

Second, we should pay attention to countries that already have a thriving open finance ecosystem. For example in the US, more than 1 in 4 adults have connected bank accounts to other products like Venmo, Cash App, Coinbase, and Robinhood using traditional methods. International experience points towards positive outcomes through traditional methods (which matches the New Zealand experience to date).

Third, the most important way to bring open finance to life in New Zealand is through great products like Xero, where bank account connectivity was harnessed to significantly improve the UX of accounting. We'll hold back our local fintech market if we don't continue to build momentum before CDR.

Consumers should be very clear about how these traditional methods work. And where possible, products should provide alternative options alongside account connectivity. But these methods should not operate in a grey zone, and Government acknowledgement would clear that up.

Friction point #4: Whether our fintech ecosystem can make pre-CDR progress via contractual access with data holders

Banks may choose to offer API access through a contractual arrangement. Xero is an example of an organisation that grew big and powerful enough to negotiate contractual access with New Zealand banks.

Contractual access can be better than connecting via the web apps or mobile APIs of the banks. The key reason is that the end user completes authentication and authorization directly with the bank, rather than via an intermediary like Akahu.

From Akahu's perspective, there are two prerequisites to arranging contractual access with banks.

1. The bank's APIs must be feature-complete.

There's no point switching from traditional methods to contractual access if it's a backwards step in terms of functionality.

The banks are all at [differing stages of API-readiness](#). Only one of the major New Zealand banks has a suite of APIs that we consider to be reasonably functional (shoutout to BNZ). Most fintech products are not viable with that patchy coverage. So right now, we can't support our app customers through contractual access alone.

2. The bank's contractual terms must be reasonable.

Even if a bank has feature-complete APIs, contractual access can be prohibitive for Akahu and our app customers if the terms are unreasonable.

These are the difficult aspects that we've experienced:

- It's very time-consuming to negotiate contractual terms with each bank.
- Unless you're a large and influential organisation, there's an imbalance in negotiating power because there's no real incentive for a bank to increase consumption of their APIs.
- In the contractual terms that we've seen, a bank will always retain the right to decline any of our app customers. In my view this is anti-competitive, and there is no good rationale for a bank to restrict its customers from interacting with a legal product.

Direct contractual access will be largely swept away by CDR, which will install an accreditation process and set the terms of access. But in the interim, these issues make it difficult to provide account connectivity through contractual access.

Friction point #5: How to drive consumer awareness and uptake of open finance

I often hear the view that people don't know about open finance, and therefore they don't trust it. The kneejerk reaction is to launch taxpayer-funded public awareness campaigns, as we've seen in the UK and Australia.

I think it's a waste of resources to try and "educate consumers about open

finance". Instead, we should build great products, and help consumers to make informed decisions about account connectivity once they're clear about the specific value they'll get from that product.

Xero didn't require a public awareness campaign in order to drive uptake, they just had to demonstrate the value that customers get from connecting their accounts.

Final words

These are some of the current issues that we're seeing debated (publicly or privately) at the coalface. If you've read this far, I hope I've delivered on the promise of spiky views and a non-wafty opinion piece.

To the innovators in this space, I can't wait to see what you build.



In Profile – Credisense



Founded in 2017 and based in New Zealand, Credisense is a digital, end-to-end customer origination platform that integrates and automates the customer onboarding, risk decisioning and engagement processes.

Credisense's stated mission is to provide fluid and flexible origination solutions that help businesses of all sizes lower their risk and increase their efficiency, allowing them to make smarter decisions, faster.

Credisense takes the 'no code' approach popular with many modern, cloud-based platforms, meaning functionality can be implemented or changed by customers as well as Credisense, and changes overall are faster to enact,

The company has built digital origination platforms across NZ, Australia and South East Asia covering multiple industries from retail banking and financial services to telecommunications and enterprise B2B customers.

The platform provides the 'glue' – including workflow, questionnaires, models, calculations and decisioning – to form complete end-to-end processes that utilise data from sources such as banks, credit bureaus and securities registers. Additional functionality can be further integrated into the process, from third parties or Credisense's own biometric solution OneMatch.

Credisense co-founder Richard Brooks says:

“In an ideal world, we'd like to see concrete regulatory plans laying out timelines, participation rules and homogenised standards across all the identified industries where open data will apply. Interoperability across regions is an important component.”

Whilst consumer seems to be the topic du jour, commercial data, particularly in the SME space is hugely important to ensure that a massively underserved component of the economy gains maximum value.

Open data has huge implications in our world with richer, granular data allowing for both better risk profiling, better products and outcomes for customers.

For further information please see credisense.co.nz



Data Sharing Activity Snapshot

This section gives a view of the activity and interest we discovered, that should evolve to be the basis for New Zealand's true open banking activity in the near future.

As the country is still in such an early stage, with the 'flood gate' of a mature, government-supported CDR still to come, we looked at this activity and interest across a few variants:

- Current use of 'permissioned data sharing' – when a consumer gives a TPP permission to access data held at a bank, regardless of how this is currently being performed
- Current related activity that would potentially benefit from a move to CDR APIs in the future
- Interest expressed in future activity, captured from our survey and interviews

The majority of existing activity currently uses the commonly available mechanisms to achieve integration with banks, being screen scraping (via an intermediary or directly), or wrapped mobile banking APIs via an intermediary. With the benefits outlined throughout this report we would expect that many of these cases transfer to open banking APIs once available under the NZ CDR. In some specific cases direct API integration

with banks is used already.

As well as strict data sharing examples, we describe related use cases such as wallet topups – also a prime candidate for moving to CDR APIs, and enrichment as an important value-add treatment for shared data.

As noted earlier, a condition of participation in our survey and interviews was that we would not disclose specific responses to the survey, allowing survey participants to openly share their perspectives. As such we have presented only publicly available information for these examples, and note that not all companies mentioned have participated in our process.

Interestingly, many of the TPPs providing services in New Zealand are overseas operators rather than local fintechs. These players typically use intermediaries to operate their core platforms across different countries, and that appears to be the case with the examples here.

We also spoke to software platform providers such as Credisense interested in incorporating CDR API capability into the platform products they provide to multiple financial services organisations. The possibility of API use snowballing by being available from productised platforms such as this is very exciting.

In this initial, 'Discovery' themed, year of our report, with limited reach into this still very nascent market we have not attempted to be exhaustive in terms of numbers of TPPs operating in New Zealand, but hope in subsequent years with a greater awareness of the study and a more mature market to provide more quantitative data on activity.



Personal Financial Management

Personal Financial Management ('PFM') is to many people the quintessential open banking use case. These platforms provide a consolidated view of a user's financial interests, sourced via permissioned data sharing from a range of data providers. PFM platforms typically take various approaches to providing additional value such as budgeting, forecasting, coaching good financial behaviour, goal setting, detection of subscriptions, A.I-driven insights, comparison to peer financial activity etc. There are a wide variety of these apps available in New Zealand, with many providing synchronisation with bank accounts. New Zealand-made offerings [MyBudgetPal](#), and [PocketSmith](#) vie with overseas options [Kubera](#), [Spendee](#), [Wally](#), [WeMoney](#) and others.

The ability to take different approaches to the same basic functional theme means although the NZ market is already fairly densely populated it may not necessarily be cut off to new entrants with good ideas.

An assessment of the New Zealand PFM market appears somewhat topical at the moment - as the country stares into a 'cost of living' crisis, alongside regulations around lending affordability, it would be reasonable to expect a growing interest in PFM as consumers try to get tighter control over their finances.

Providing a consolidated view across a customer's various interests is also an interesting potential value-add play for many existing financial services providers, with potential to lead into innovative new uses that leverage their existing business models. We spoke to several companies interested in pursuing this once open banking APIs are available.

The ability to transact on this consolidated data is the obvious natural extension of displaying it, for example providing sweeping functionality. We did not see any evidence of TPPs providing this in New Zealand currently. Overseas, the [Yolt](#) app provided this functionality but was withdrawn from market in 2021.

We heard concerns expressed about the total cost to access the many different data points required to provide a complete view across multiple providers and asset classes for a moderately complex consumer, and that sometimes the total cost of obtaining data can outpace the fee that can realistically be charged for this kind of service. The hope was that new routes to accessing the data under CDR would hopefully lower overall costs and make this a more feasible model to pursue.

For those very early stage TPPs we heard from, some in very exploratory mode still, PFM platforms were an area of particular interest, reflecting the status of PFM as the quintessential use case as above.





Peer to peer payments

The ability to initiate peer to peer payments is also one of the use cases that first comes to mind for many people on the topic of 'open banking', given the well-known presence of such payment apps overseas, notably Venmo and CashApp in the US.

Arguably, those apps have solved a problem in regions such as the US that NZ has suffered less from, given our ability to make payments by internet banking and banking apps for many years (though typically requiring a cumbersome bank account number to do so), and the 'pay to mobile' feature now offered by some New Zealand banks. That said, the ease of - and attitude to - making payments in NZ has never previously universally extended to, say, paying a busker on the basis of a simple ID (like a Venmo username) or QR code.

New Zealand has a promising level of newer activity, with [Dosh](#) having launched in October 2021, and alternatives [Bankroll](#), [Dolla](#) and Red Bird Ventures' [Buck](#) all currently in beta. TradeMe has built [Ping](#) to support auction payments and it functions similarly to a P2P payment platform within the Trademe ecosystem.

Dosh uses a 'wallet' model (Venmo or CashApp similarly have wallets)

and rather than initiating payments through the standard banking system, payments take place purely within the Dosh platform, in near real time. As such, Dosh would likely not use open banking payment initiation APIs to carry out P2P payments in the future, but could use them for wallet top-ups from linked bank accounts, controlled directly from the app. Dosh has recently partnered with Visa to provide a branded card that will enable payments from the Dosh wallet.

We understand Bankroll, Dolla and Buck to initiate payments via banks, meaning they could take advantage of payment initiation APIs in the future, along with the expected improvements to the NZ banking system, including a move towards realtime payments under Payments NZ's Payments Direction work.

Wallet Top Ups

The ability to move funds in and out of a 'Wallet' within an application opens the doors to a huge number of use cases. From an open banking, or permissioned data sharing perspective, topping up a wallet balance from a connected bank account has benefits:

- As the TTP initiates the topup, they can perform a check beforehand and only move the funds from a connected bank account if it won't put the account into a negative balance.
- Once the API call responds as having 'succeeded', the TTP can credit the consumer's wallet even before the banking system has completed moving the funds to the TTP's bank account
- Amounts to be transacted can be calculated given the TPP's read access to the consumer's account. [Sugar Wallet](#) supports 'set and forget' fund investing, and illustrates this. Users select a percentage of their income to invest, ongoing. The intermediary that Sugar Wallet uses calculates the user's income on the basis of their transaction history, and funds are automatically invested at the correct percentage, waiting to do so until the user gets paid.
- Other options for optimising invested funds under management include varying topups by using rounding, sweeps, etc.

A 'wallet' representing at least the assets managed is inherent in investment-based TTPs. Other examples active in New Zealand include:

- [Debut](#) - Investments in Decentralised Finance (e.g. Crypto) assets
- [Carbonz](#) - Investments in tradeable carbon credits

We also learnt of a further TTP with a service for managing the shared 'pot' of money for shared housing, flatting, situations via a wallet.

A wallet construct with a connected bank account should potentially be of interest to any business that lets a user carry a balance on an account, for instance the TAB, or public transport providers. The decision to pursue this would be based on a number of factors, such as the propensity for the customers to get into financial distress using the service (given the ability to limit topups from a bank account that would be reduced below a threshold amount), the cost differential of APIs vs the current topup method, and the general fit for the user population in terms of user experience.

KYC and AML/ID Verification

Bank data sourced via an intermediary is being used as part of wider identity verification processes.

[First AML](#) and [Verifi Cloudcheck](#) currently use the verified name and address associated with a bank account to match against the details supplied by a person having their identity verified as an alternative to biometric verification.



Transaction Enrichment

This process increases the usefulness of a bank's basic transaction information, by the addition of data such as business names, branches, addresses and goods and services categories etc.

This is primarily a B2B use case, where either a TPP would make use of data enriched by another party (such as their intermediary) as part of providing their service to their end customer, or a bank would engage a service directly to enrich data for internal use, for display to customers and optionally also supplying this enriched data downstream to TPPs.

TPP uses for enriched data that we have found to be currently active in New Zealand include supporting better quality analysis of spend histories for credit decisioning/broader affordability assessment (topical given recent discussion on CCCFA), and to provide the necessary increased detail for the loyalty programme use described below in the Ongoing Transaction Monitoring section.

TPP use of enriched data to improve the value delivered by [Personal Financial Management apps](#) is an obvious application that is currently in play overseas.

Use of enriched data by banks is more mature in Australia, where providing richer transaction details to customers in their online banking is thought to be reducing the number of suspected fraudulent transactions raised by those customers. Especially in cases where legitimate transactions may appear with unrelated business trading names, customers with more information about a vendor are either not raising disputes, or more quickly being satisfied that transactions are legitimate. Banks are balancing the investment in transaction enrichment against the typical cost to investigate a fraudulent transaction. [Look Who's Charging](#) provides an excellent

illustration of what this looks like in practice with their service supplied directly to banks.

Wider use of enriched data in any sort of transaction analysis has huge overall potential for any customer conversation or marketing that leverages that analysis. While a lot of enrichment can be performed manually, the introduction of data science methods stands to [improve both efficiency and outcomes](#).

Real-world limitations on what is possible with enrichment include a loss of fidelity in categorisation when single stores sell a wide variety products (supermarkets sell both 'necessities' and 'luxuries'), and a similar obfuscation with products bought via BNPL channels. In the UK concerns have been raised about a worrying trend of consumers buying necessities through one BNPL provider and this being essentially hidden from the affordability calculations of subsequent BNPL providers they use, due to lack of detail on the actual vendor.

Payments Reconciliation

Ongoing reconciliation of payments received against those expected is a less intuitive and less publicly visible – though highly logical – application of having permissioned access to bank transaction data. Current use in New Zealand that we have found includes:

- internal use within a company, applied using inhouse-developed scripts, sourcing transaction data from an intermediary in a more useful format than available directly from the company's bank
- reconciliation performed by a TPP as an aspect of a broader service. New Zealand company [myRent](#) provides good examples of this, offering reconciliations of rental income received either into a landlord's connected bank account, or alternately into a bank account that myRent manages. We also heard from other companies interested in adding a reconciliation capability to their existing products in the future.

With the significant increase in online subscription service use in NZ (Netflix, Spotify, Asuwere, My Food Bag, etc) there is probably also an opportunity to apply reconciliation at the consumer end to reconcile what is being paid with what is being consumed/receipted, most likely as part of a PFM offering.

Ongoing use of transactions

Performing ongoing permissioned monitoring and analysis of a consumer's transactions has applications in both providing the core service to a consumer, and as part of ongoing customer management, from both a marketing and engagement perspective and potentially as part of ongoing credit risk management.

- [CommUnity](#) is a registered charity with a loyalty-style programme that uses ongoing access to connected accounts. Consumer transactions are monitored for spend at participating merchants, with a percentage of that spend distributed to the consumer's nominated charities. Transaction Enrichment is used, for instance where merchants have multiple branches that CommUnity must differentiate between.
- While single point-in-time analysis to support credit decisioning occurs in NZ, we did not find any evidence of ongoing variations to this, or in fact any other ongoing customer analysis peripheral to the primary service offered. Given [recent events in the BNPL space](#), more proactive attention may start to be paid to ongoing consumer financial health for certain use cases, particularly in the area of their ability to repay loans across multiple lenders.
- In light of the increasing interest in how larger tech companies are using customer data it will be interesting to see how consumers view giving enduring account access to TPPs going forward, globally, and whether any restrictions would ever be put in place on this.

Ongoing use of transactions for a business service

We have distinguished this use case from that above, as the permissioned sharing of core business banking data in a B2B arrangement with a TPP that uses that data for an agreed, ongoing service.

The most obvious example of this is permissioned access to bank data by accounting providers such as Xero and MYOB. Some smaller providers such as [Solo](#) also receive bank data.

More broadly we heard encouraging levels of interest from TPPs for data access under CDR that would support use cases such as invoice finance and debt management. Consolidated management-level reporting was a third use case, where the large number of data points required was noted as driving a need for more cost-effective access to that data to be feasible, which was hoped to come with CDR API access.

Supply of financial transaction history

This use case involves the permissioned supply of a consumer's transaction history to another party. The most obvious example of this is the supply of consumer bank statements to mortgage brokers to use in their processes for loan applications. Current providers include [illion](#) and [CreditSense](#).

While according to their websites both of these companies currently use screen scraping we note that in Australia illion has attained Unrestricted Data Recipient status.

In Australia the ['trusted advisor' accreditation model](#) is specifically designed to cater for cases like mortgage brokers accessing raw data without overly onerous compliance requirements.



Other payments

This section covers payment scenarios in addition to the P2P payments and wallet topups covered above.

In theory the majority of payment flows stand to potentially benefit from changing to open banking API-based payments:

- Any payment 'pulled' by a TPP with read access could benefit in the ways described above, being the ability to vary the amount paid or the timing of the payment, and the ability to process a payment only if it won't put the payer into a negative balance. This would be especially useful for services with customers that often risk default or financial distress such as BNPL operators. Possible flows include sending a notification to a customer that the payment will be attempted again at a later date. Use with recurring payments for ongoing services like broadband or insurance payments opens the benefit in using API payments up to corporates that provide these services, as well as the smaller 'fintech' TPPs we have mainly concentrated on in this report, meaning Vodafone or Southern Cross could be potential TPPs in the future (or, alternatively, outsource API payment handling to a dedicated provider).
- Any payment currently using cards could expect a lowering in costs, subject to the changes in charges introduced via the Retail Payment System Act, which could potentially reduce the benefit. BNPL operators typically use credit card rails for both the initial purchase

and subsequent repayments, and so stand to benefit materially from a change. It is worth noting that payments via API rather than credit cards will forego the 'extras' that come with credit cards: chargebacks, insurance when purchasing travel, etc.

- As the TPP initiates the API call for each payment, they will always know the associated customer, eliminating problems from incorrect details attached to payments received from other channels

In terms of specific providers:

- [BlinkPay](#) provides the ability to pay bills and confirm online purchases directly from within a consumer's mobile banking app or internet banking site. See the separate profile later in this report
- [PaySauce](#) and [PayHero](#) are providing employee payroll payments as part of their broader payroll offerings
- [POLi Payments](#) and [Account2Account](#) are incumbent payment channels currently using screen scraping.
- [Limbo](#), currently in beta, provides an escrow-style service for the trading of second hand goods under \$10000. They hold funds for a default three days after a courier tracking notification shows the goods have arrived, to allow the buyer an opportunity to inspect the goods. Their LimboPay option allows buyers to pay for goods directly from the Limbo app.

Looking Forward:

Comparison services are not available in NZ, but given the switching functionality planned for addition to the Australian CDR, this would be likely in the future. The basic idea is to take a consumer's history at their current supplier and suggest alternative suppliers who would better fit the consumer's behaviour, then provide a frictionless way for the consumer to change providers. There is an outstanding question of the levels of complexity of a business that would make this feasible, vs being too broad-brush in the analysis (e.g. while simple health insurance premiums can be compared, the nuances of how existing conditions are managed may require a proper conversation)



In Profile – Dosh



Founded in 2021, Dosh is an authentically Kiwi digital payments platform. It is the first of its kind to provide a fully-integrated, instant and secure contactless mobile payment platform in New Zealand. It allows instant payments to be made between friends and businesses via mobile or QR codes. Additionally, it allows users to split bills, ask friends to pay them back, and redeem special offers all from the user's mobile device.

While living abroad, founders James McEniery and Shane Marsh recognised that New Zealand lagged behind much of the world in the digital payments space. Accustomed to using their digital wallets for most day-to-day transactions, on their return to New Zealand they saw no such use of the technology. In response to this, McEniery and Marsh set out to establish New Zealand's answer to the world of digital payments.

“Setting up online banking payees and waiting for funds to clear is antiquated to the rest of the world. We quickly became accustomed to the convenience of these applications abroad, and upon our return

were taken aback to find New Zealand so far behind in this area.”

Dosh's primary function is to enable instant mobile payments 24/7 through a smartphone or QR code. It allows users to pay any mobile number on their contacts list, whether they are a Dosh user or not.

Dosh customers can place up to \$5000 in their Dosh wallet, which is held in trust by BNZ. Peer-to-peer payments are then made between Dosh wallets, and customers can also make payments directly from their mobile device to retailers using QR code technology. Dosh has recently reached a milestone agreement with Visa to release a Dosh Visa card for customers. The card will allow customers to make payments directly from their Dosh wallet anywhere Visa is accepted. To enable the next phase of their development, Dosh has recently closed a \$5 million funding round. Their ambition is to integrate additional capabilities to become the universal 'financial super app' in New Zealand.

“We believe there is a gap in the market for Dosh to provide services that give Kiwis greater freedom and control over their money.”

To find out more about Dosh, visit dosh.nz

In Profile – Wych



Wych is an AI powered financial assistant that aims to help customers and business manage their finances and optimise spend. It takes an “inform, advise, do” approach to let customers know how they are spending, where savings can be made, and actioning the change for them.

Founder Dermot Butterfield started Wych after working at a business insights company and noticing an opportunity to use consumer data to deliver valuable insights directly to the individual.

Wych works by using AI predictive analysis, for instance estimating what a customer's incoming bills are going to be, and how much that will impact their total spend. Unlike other digital financial assistants, it follows a per-customer model and adapts to how they work, rather than forcing a customer to follow a new process.

Wych aims to be able to action the optimisation opportunities that it identifies for the customer, such as switching power companies if it identifies a cheaper or more environmentally friendly alternative.

Wych's activity is most progressed in Australia with the country's more mature CDR standard. Wych registered as a test partner for their CDR standard and became certified as an Accredited Data Recipient. Wych have their first product accredited and active at that standard in Australia and are in the process of readying a subsequent product.

Wych is currently raising capital to support their market entry to New Zealand. To find out more, visit <https://www.wych.it/>



What are Third Party Providers' Priorities for a CDR?

This section deep-dives into the feedback we collected from TPPs, especially in terms of what they would like to see incorporated into New Zealand's CDR approach. Our survey included the option for responders to mark themselves as being available for follow-up interviews, and the interactive nature of those sessions naturally yielded a far richer set of insights than the written survey. We suggest to any TPPs wanting to participate in these interviews in subsequent years that they please ensure they record that interest in their survey responses.

Clarity on next steps:

Across the bulk of our interviews and survey responses - almost universally - was a desire for clarity from the NZ Government on the forward plan for the CDR construct: what will be done, by who, and by when. Several TPPs said they would also like a view of the controls that would be implemented to ensure timelines are met, as delayed implementations were a recognised issue for countries such as the UK and Australia. The coming draft bill is eagerly anticipated, and the consistent ask was for as much clarity as possible on the associated broader process to move the CDR forward.

The value of this clarity and the impact it would have was illustrated thus:

- Some TPPs are delaying the market entry of planned products until open banking APIs are available, due either to currently available data access methods being outside their risk appetites, or a wish to not 'build their product twice'. In some cases, established companies were reluctant to ask their existing customers to provide their banking credentials in light of [well-publicised historic warnings](#) against such methods by banks.
- In some cases, NZ TPPs we spoke to have either already pivoted their focus to the more mature Australian market, or are considering doing so on the basis of uncertain NZ timeframes. They noted the small scale of typical start-ups meant inevitable resource constraints

needed to be carefully managed. This resourcing point was echoed more broadly by companies eager to be able to confirm when they could confidently plan to address open banking in their product roadmaps, allowing for the small development team sizes in many of these companies, and the current, COVID-impacted, limited labour market for the necessary resources.

Most TPPs shared a sense of frustration at the pace with which the New Zealand ecosystem has moved forward with open banking APIs. Many referred to [Minister Faafoi's open letter](#) to API providers, but also recognised that the exact requirement on banks is currently uncertain, with the Payments NZ API Centre API specification generally expected to be used as the basis for a target specification, but with this yet to be fully confirmed. TPPs were also aware of the wider mandatory compliance requirements that banks have had to meet over recent years such as CCCFA and BS11, and acknowledged the impact of COVID on the overall availability of technology talent in NZ.

The idea that clarity from the government is the specific first domino that needs to fall to set the rest into motion was widely agreed among TPPs.

Strategically aligned, consistent and clear approach

TPPs noted that the move towards open data will happen within the broader context of New Zealand's evolving business and government digital landscape, and will itself also have multiple moving parts. They hoped that – especially given the lower complexity of the New Zealand environment compared to countries like Australia and the UK – a cohesive approach that aligned to broader strategies, promoted ease of engagement and was easily understood could be pursued:

- A common request among TPPs was for standardised, centralised regulation with processes that are easy to engage with. Given the intention to incorporate data from different industry verticals aside from banks over time (e.g. telcos, energy companies and ideally government), and a requirement to address the data sharing topic through a variety of regulatory lenses (e.g. information security and commercial concerns), TPPs stated that a consistent, 'joined-up' approach that is clear to understand would be of immense value. They noted the potential benefit of an overarching umbrella entity overseeing all aspects, and this could potentially mitigate issues some TPPs had experienced overseas with regulators that appeared less unified than ideal.
- Singapore was cited as a market that successfully promotes fintech innovation, with a recognised government aspiration for the country to be '*great at it*'. Enablers such as incubators and [regulatory sandboxes](#) then flow as natural extensions of this. TPPs highlighted New Zealand's opportunity to follow Singapore's lead, visibly placing initiatives such as CDR within a broader construct of what NZ as a country wants to achieve, and aiming to have all such initiatives widely acknowledged as working in concert with each other. Obvious candidates for inclusion in this holistic approach include Payments NZ's [Payments Direction](#) work and the [Reserve Bank's Future of Money initiative](#). Minister Clark referring specifically to the CDR working "hand-in-hand" with the [Digital Identity Trust Framework](#) is an encouraging sign.



The Future Open Banking API Specification:

At a high level Open Banking datasets and operations as they are typically discussed internationally would support the majority of use cases we heard from TPPs. Access to transaction histories, account confirmation and payment initiation were unsurprisingly key. The devil is – as always - in the detail, however.

Support and well-thought-through approaches for 'real world' use cases was brought up many times across our interviews, with examples such as:

- **Support for joint accounts** was considered important. This would include dual authorisation, with consideration of whether it should be treated the same in a digital world as it has been historically. The natural extension of this, catering for couples separating, was almost always brought up as well. Complications such as estranged parties obtaining their former partner's new address from banks via joint accounts were raised, with the way enduring consents are managed obviously key to these kinds of cases. [Australia](#) has provided some specific support for joint accounts.
- **Access delegation**, where one person has some formal rights over another's accounts, was also commonly raised. This includes operation under an enduring power of attorney construct, or acting on behalf of children or aging relatives (including without EPA). It was noted that – especially under a CDR including write access – consumers sharing credentials to work around a system that doesn't formally support this brings risk, especially in terms of traceability of who performed an action. It was universally agreed that any delegated access should default to a subset of functions only rather than full access. We note that the *Establishing a Consumer Data Right* cabinet paper refers to "secondary users" given access privileges, and restrictions on those privileges, so this topic appears to be being considered.

Broader than just CDR, the surprisingly large proportion of the NZ population without access to the internet or who struggle to use it was raised, noting that a move towards a more digital-centric banking system will need to include consideration of those people, likely with a mix of education and possibly retaining access channels that do not rely on the internet.

The value of formalised rules and/or controls for the quality of the results returned from APIs was raised, due to experience overseas of variability in the completeness and quality of results returned by different organisations, where some results fulfilled the strict contract specified by the API but included low quality data, such as empty character strings. We note that given the smaller, more contained nature of the New Zealand market it is likely that participants would meet the spirit of the API specification and no such formal controls will be necessary. In Australia, the [ACCC has issued warnings on data quality](#).

Several TPPs expressed an interest in eventually extending their reach as 'central hubs' for consumers to control their connected lives, beyond dashboards and the ability to pay bills to specific providers, through to providing 'single click' updating of consumer details across multiple providers at once, potentially including government services. While intuitively this sounds convenient for the consumer, we believe support for this capability should take into account that various checks (beneficial to customers) are increasingly being included as part of organisations' processes for increasingly rare personal touchpoints such as contact detail updates. Examples include checks for new dependents covered on insurance, insured amounts, single view of customer checks etc.

Given likely tranching, or staggering, of features to be introduced over time into an evolving API specification, TPPs noted that having an early solid view of how the main components would eventually work and interact would be highly desirable, rather than a less intentional 'bolting on' of features over time. The implication of this is an increased 'front loading' of market

engagement and consultation to support high level design across the broader feature set

- Coverage for business bank accounts and write access (e.g. payment initiation) were identified repeatedly as being valuable features suitable for high prioritisation for delivery. [Both of these features have been confirmed as being in overall scope for the CDR by MBIE](#)
- Consideration of an approach that favours speed over completeness, even within specific features, was proposed as a way to realise value early. This would mean that support for 'typical' variants would be delivered initially, with less-typical and edge cases addressed later.

The idea was raised that a pragmatic approach to controls would take the materiality of transactions into account, for instance with differing levels of diligence imposed on a \$10 transaction vs a \$100k transaction.

While many TPPs are exclusively interested in bank-held data, some others see definite use for data held by the broader set of future data providers such as telcos and energy companies. An example of this would be the ability to suggest bundling, discounting or customisation options for customers on the basis of their activity at a previous supplier, as part of a broader, managed onboarding process. There was also interest in being able to access government-held data ([especially in the area of digital identity](#)). The ask here is for a consistent, joined-up approach across these various data sources, ideally with a high-level strategic approach confirmed from the outset.

Associated processes

Accreditation and management of consents were repeatedly identified as being key considerations:

- Assuming enduring consents are to be part of the CDR, consistent, streamlined management of the entire lifecycle of a consumer's consent to share their data will be important, and interviewees were vocal about what is likely to matter:
 - Consumers should be made very aware of what they are consenting to, and an educational campaign would help to raise the level of knowledge required to understand any further nuances for specific consents.
 - New Zealand should take the learnings from other countries on consent management into consideration – at time of writing the UK is part way into a move from re-*authentication* every 90 days to a much lighter re-*confirmation* process.
 - The process to rescind an enduring consent must be easy – and easily understood - for consumers. In the UK approach mentioned above, if consents are not re-confirmed by 90 days then access is automatically revoked. Arguably, if consumers are not using services regularly they may find consents lapsing without their knowledge, with potential negative consequences such as balances not being included in Personal Financial Management calculations.
 - Ideally, consumers would very easily be able to access a

complete list of all the consents they have in play. The idea of a dashboard showing all current consents that also allows for easy rescinding was raised, and would obviously need appropriate data flows to enable it. Notification of consent changes to a central service could be included in the future API specification to support this. As noted earlier, some intermediaries already provide this, but only for consents they have managed.

- TPPs noted the dual nature of long-lived, enduring access to a consumer's data, on one hand enabling innovative analysis use cases that bring real value to the consumer, but on the other hand potentially veering into 'creepy' territory when that analysis goes too far. With consumers generally more aware of how their data is being used, especially by online tech giants, TPPs were concerned about overall loss of consumer trust if things are pushed too far. Without specifying a solution, the ask was for attention to be paid to what could be done to keep overall usage on the right side of the 'creepy line' to maintain trust. The Cabinet paper "*Establishing a Consumer Data Right*" (July 2021) noted "*that the creation of additional information and consumer protection safeguards for consumer data, beyond the existing protections in the Privacy Act 2020 in respect of personal information, will support consumer trust and confidence in the regime;*", which implies that this concern is shared by government as well.





The need for a thoroughly thought-through **accreditation model** for granting various rights to participate in the CDR construct was raised by many interviewees as being central to the New Zealand CDR succeeding. They highlighted that it should take into account the various ways data could be accessed by participants, including the differing levels of detail that could be revealed to different players. The existing Australian Accreditation Model caters for a variety of options encompassing all the styles of access that were raised in our interviews, and several TPPs said it appeared to form a reasonable basis for a New Zealand model to be built out from. It is summarised in the Australian Context chapter of this report. Aspects of a New Zealand accreditation model that were important to our interviewees (all catered for by the current AU model) included:

- Differing accreditation models/roles, providing for a lower compliance burden for those acting through an intermediary
- Some interviewees were interested in eventually becoming intermediaries. They raised:
 - There is a high level of expense and effort required to attain the Unrestricted ADR status in Australia, which is necessary for an entity to operate as an intermediary. New Zealand players would like as early a view as possible on the requirements for an analogous NZ status, as the effort and expense could be factors in their choice to pursue being an intermediary or not. From our perspective, as so much of the Australian model hinges on well-functioning UADRs we believe a rigorous set of

checks and balances would help in delivering a stable and trusted ecosystem if NZ were to follow Australia's approach..

- The ability to attract customers under a very lightweight access model requiring minimal accreditation effort by them, such as that provided in Australia by the Insights model, was highlighted by TPPs, and described as fostering innovation by minimising the hurdles for new market entrants to start.

The *Establishing a Consumer Data Right* cabinet paper (July 2021) contains the following, providing some confidence that the accreditation model will take these aspects above into consideration *"agreed that the accreditation regime is to be flexible to ensure that the requirements for accreditation are proportionate to the nature of the entity seeking accreditation, the level of risk associated with the degree of access/control over data being sought and the data set itself, and to avoid imposing undue compliance costs"*

Aside from Consenting and Accreditation these other points were discussed in our interviews:

- For use cases such as assessing the financial health/credit worthiness of an entity or individual with financial interests overseas, cross-border interoperability - ideally with some agreement on common data standards - was identified as being of value. This would cater for use cases such as assessing mortgage applications by people with an insufficient financial history in New Zealand or assets overseas, or assessing an Australian subsidiary of a New Zealand company. While likely to be prioritised for delivery lower than other use cases with higher expected volumes, this is a good example of something that will be far easier to achieve if the appropriate upfront data model analysis can be 'baked in' to the overall CDR design from the outset, especially given the likely need to consider details such as the equivalency of privacy laws and security standards between countries. Fintech NZ is currently working with both the UK Dept for International Trade and NZ's FMA to build wider aligned regulatory standards, with an initial focus on data and governance. This is a cross-country/industry initiative to support the principles of the recently ratified UK/NZ Fair Trade Agreement. In practice an example might be the ability for a UK citizen to set up an account in NZ - and vice versa - using aligned regulations, practices and standards.
- A mechanism for ongoing measurement, analysis and publication of outcomes from CDR-related changes was suggested. These could include efficiency measures, monetary savings, jobs created, etc, and support a range of aims including publicising the effectiveness of the changes, thereby fostering increased buy-in from stakeholders including the wider public.
 - The UK has excellent reporting specific to [API performance](#).

[performance](#). This includes the numbers of successful API calls and payments made per month, which paint a compelling picture of UK open banking growth. New Zealand could consider incorporating a similar reporting platform into the mechanism above.

Broader support:

The responses we received from TPPs about what broader support they would value could be summarised as "absolutely anything that makes operating within a CDR more streamlined would be great", with the phrase "yes please, all of the above" repeated in many interviews. In particular though, the following were of particular interest:

- An education campaign run by the government and industry bodies such as Fintech NZ that supports the public in understanding the inherent safety of using CDR, and the fact that it has government support and oversight. A key aim of this should be to reduce confusion when consumers are first faced with a website or app that uses CDR, as it will differ from what they are currently used to and could be confusing.
- TPPs would value a clear guide to the various accreditations and regulatory requirements that they must comply with, ideally outlining the pro's and con's where options exist (e.g. within the accreditation model). A published set of endorsed 'recipes' for technology and functional flows that when followed will allow for fast-tracking of compliance and regulation processes was raised multiple times.
- Templated agreements that TPPs could use with various partners were requested.



In Profile – Envestnet | Yodlee



Envestnet refers to the family of operating subsidiaries of the public holding company, Envestnet, Inc. (NYSE: ENV). Envestnet is Fully Vested™ in empowering advisors and financial service providers with innovative technology, solutions, and intelligence to help make financial wellness a reality for their clients through an intelligently connected financial life.

More than 106,000 advisors and over 6,500 companies—including 16 of the 20 largest U.S. banks, 47 of the 50 largest wealth management and brokerage firms, over 500 of the largest RIAs, and hundreds of FinTech companies—leverage Envestnet technology and services that help drive better outcomes for enterprises, advisors, and their clients.

Envestnet® | Yodlee® provides a data aggregation and data intelligence platform. It gathers, refines and aggregates end-user permissioned transaction level data, and combines them with financial applications, reports, market research analysis, and application programming interfaces (“APIs”) for its customers.

Typical customer use cases include applications to provide responsible loans to consumers and businesses, personalised financial management, near-instant account verification, planning and advisory services, e-commerce

payment solutions, and online accounting systems for small businesses. They provide access to solutions across multiple channels, including web, tablet and mobile.

Envestnet | Yodlee has been involved in shaping open banking technologies and policies across the UK and U.S. and holds a unique position in supporting companies of all sizes – from large banks to the smallest FinTechs – to innovate and best serve their customers both domestically and internationally.

In North America, Envestnet | Yodlee has signed more than 20 data access agreements with leading banks, reaching millions of potential consumers.

In the UK, Envestnet | Yodlee is an Account Information Service Provider, authorized to retrieve payment account data provided by banks and other financial institutions.

In India, an Account Aggregator system was introduced that aggregates all financial data in a single place and offers credit services based on that data. Envestnet | Yodlee has received approval as an operator under this new regime to further support customers in the country.

In Australia, Envestnet | Yodlee works with some of the region’s leading FinTechs and financial institutions including Finder and 86 400, and was the first CDR accredited provider with access to both CDR and non-CDR data sets, and to global open banking connections in regions including the UK and the U.S.

Additionally, the company is in discussions with the regulators and leading banks in South Africa on the future of South African open banking and establishing its first open banking connections in the country.

Envestnet | Yodlee is a member of Payments NZ and actively engaged in the development of New Zealand’s open banking and open data infrastructure.

Australia and New Zealand operations are headquartered in Sydney. In New Zealand, customers include Xero, Booster, AMP Wealth, and others. Other international clients include PayPal, 86 400, Raiz, WeMoney, Finder, and more.

An International Perspective



Investnet | Yodlee

Open Banking In New Zealand

New Zealand's financial sector has led the world, but what now?

New Zealand is at a crucial period in its financial services history. In part, its earlier technological advances have created an ecosystem where there hasn't been a high level of agitation for change.

New Zealand embraced free card payments EFTPOS faster than others. Peer-to-peer payments have been easy for as long as anyone under the age of 40 can remember. PayPal popped up to help consumers settle purchases made on eBay, Kiwis shopping on TradeMe simply used their internet banking. Venmo made it easier for American consumers to make peer-to-peer payments, New Zealand consumers had been sending money to each other through their mobile banking apps for years.

Banks operating in New Zealand initially innovated away friction where other

countries did not. This served Kiwi consumers and businesses well. The future is looking at lot less certain.

Open banking could be the catalyst for change

Open banking stands to provide New Zealanders with access to a more vibrant, competitive financial ecosystem. For proof, you need only look to Australia, where platforms like WeMoney, Raiz, Finder and others are offering consumers innovative financial services that improve outcomes, all built on secure, open data.

Combined with a greater consumer and business demand for change, clear communication and legislation from regulators has helped put Australia in the enviable position of having one of the world's most dynamic fintech industries. According to the ASX, the Australian fintech industry was worth more than AU\$4 billion in 2020, up from \$250 million in 2015.

With its own rapidly growing FinTech sector, New Zealand's regulators could provide a further boost to this industry by doing two things:

1. Move quickly to provide clear guidance on the structure and expected timelines for its CDR legislation
2. Permit the sector and existing data holders to continue to use of

traditional data aggregation technology to launch solutions that can eventually be transitioned to use CDR provided APIs.

Open data drives international competition

Another country implementing a Consumer Data Right (CDR) doesn't immediately introduce competition to New Zealand. But it does support an environment that fosters innovation and growth. In this environment, FinTechs embrace data aggregation to build and validate new services. Those that succeed in their local markets soon look offshore for further growth. We can already see this happening with Australian FinTechs expanding into New Zealand.

Already, Wise is here and steadily growing its share of international remittance. MoneyHub, a leading New Zealand personal finance blog, [recommends the Wise debit card to Kiwis](#) for day-to-day spending with the added benefit of it beating all others on foreign currency fees and exchange rates.

Revolut, the UK fintech, has been planning its New Zealand launch for the last couple of years. Their submission on MBIE's Merchant Service Fee consultation suggests they're serious about launching here.

WeMoney has gone from launching in Australia to being live in New Zealand and elsewhere around the world, bringing with it competition in the financial wellness space.

Finder are live in New Zealand and helping Kiwis find the best products and services for their personal situation. If they join MoneyHub in recommended that services provided by international players international players above New Zealand's banks, does that not represent meaningful competition?

New Zealand has itself seen FinTechs grow here and embrace open data to expand their services internationally.

While consumers embracing open data solutions internationally might not represent a competitive threat, FinTechs are using their experience to hone their offerings and prepare for international growth. This means competition.

Rolling Out a CDR

Learning from the UK

The UK could be considered a pioneer in the regulation of open banking/data. We believe that when imagining the future of New Zealand's CDR regime and uptake, the UK experience is a good starting point.

A key insight from the UK is that adoption of open data services hasn't been as quick as originally projected by some. At the end of 2021, there were approximately [4 million consumer and business users](#) of open banking.

This doesn't mean that the UK's open data efforts have been a failure. It simply highlights that we must not underestimate the level of change that open data brings about, and how long it takes for consumers and

businesses to adapt and embrace services built on top of it.

New Zealand must keep this in mind and consider what it can do now to accelerate adoption, rather than waiting for the CDR to be live. We know that data holders will need time to stand up APIs and compliance, security, and service processes. Equally, consumers and businesses will need time to understand and trust new services enabled by open data.

Envestnet | Yodlee can help accelerate this process by taking steps to drive open data adoption and understanding now, as well as giving data holders and potential data recipients a clear understanding of coming regulation and expectations.

Trust is key to rapid adoption

Both regulators and business have responsibilities in building the trust and familiarity required to accelerate adoption. Regulators by clearly communicating their intentions and timeline. Businesses by building solutions based on traditional open data techniques, to increase familiarity among consumers. These use cases and the familiarity created by using them will drive trust.

The growth of a Envestnet | Yodlee customers like WeMoney or Finder, who built their services on top of data aggregation in a non-CDR environment, shows that businesses don't need to wait until CDR is live to start building consumer trust in open data. In Australia we provide our clients with access to both CDR and non-CDR data, from within Australia and overseas connections.

Envestnet | Yodlee has many customers in New Zealand demonstrating the same, including Booster, AMP who both provide personal financial management tools.

In North America, Envestnet | Yodlee has signed more than 20 data access agreements with leading banks, an endorsement of its ability to securely aggregate data in a non-CDR environment without APIs. This builds trust and means that when CDR style APIs become available there, consumer trust in data sharing will already have been secured.

New Zealand must continue to build trust in open data services while its CDR is being designed, implemented, and maturing. It is vital that regulators do what they can to support this.

A hybrid approach to data access is critical

It is Envestnet | Yodlee's position that data access encapsulates both APIs and traditional data aggregation techniques. [South Africa's Reserve Bank](#) agrees, stating that both traditional data aggregation techniques and open APIs enable open banking.

It is traditional data aggregation techniques and direct agreements with data holders that have generated the demand for standardised, regulated, open data frameworks around the world. In the US, our data aggregation solutions are underpinned by our data access agreements with more than 20 leading banks.

Through these traditional methods and the intelligence and solutions we add, we have built trusted relationships with our clients, and they with the consumers and businesses that they serve.

Additionally, our experience shows it takes time for a CDR to mature to the point that APIs completely replace traditional data aggregation. In Australia, where Envestnet | Yodlee leverages both CDR and non-CDR data to provide personalised digital banking, lending, verification, and financial wellness experiences. We believe this will continue for several years.



Traditional data aggregation fills the gaps in a CDR's scope and must be allowed to continue to do so until those gaps are filled. We agree with [the view provided by ākahu](#) in its submission to the Ministry of Employment, Innovation and Employment's MBIE's CDR discussion document when they request that regulators acknowledge the use of traditional methods and encourage data holders to make data available for consumer-permissioned use.

MBIE has declared that the goals of New Zealand's CDR are to give individuals and businesses access to a wider range of products and services, reduce search and switch costs, facilitate competition, encourage innovation, increase productivity, and help build the digital economy.

As we stated in our submission on MBIE's Buy-Now, Pay-Later (BNPL) discussion document:

“BNPL firms could today easily request and swiftly receive consumer financial data [to support responsible lending] – they need not wait for a CDR framework to be legislated and implemented.”

APIs will be faster and more accessible by all accredited parties, but there is a long road ahead before New Zealand has a mature CDR with widely accessible APIs. Neither the UK nor Australia have achieved this to date.

New Zealand should accelerate its adoption of data sharing through traditional aggregation. Regulators can do a lot to support this through

encouraging a hybrid approach while they launch and implement an NZ CDR. In this respect, we ask that regulators acknowledge traditional methods and encourage data holders to make data available for consumer-permissioned use by trusted organisations with appropriate account holder consent.

Lessons On Particulars

Read-write access

Aggregating data opens our economy up to the promise of a world where data is portable. Being able to take action that data unlocks further potential.

Write access unlocks stronger value. Payments. Account switching. Transfers. Automated investments. These propositions are stronger motivation for consumer adoption.

We welcome MBIE's comments in its [CDR discussion document](#), expressing that “a CDR should provide for both read access and write access in order to reduce switching costs and fully realise the benefits for consumer welfare.”

Demonstrating that local experience in New Zealand has identified significant value in write access, Payments NZ Chief Executive, Steve Wiggins, has previously [pointed out](#) that partners found stronger use cases in write-access environments during a pilot program.

We firmly believe that write access is a necessary component of a fully functioning CDR and that it is introduced in the CDR as quickly as possible. Traditional methods of data aggregation can fulfil almost all of what a read-only CDR can. It is CDR-write access that unlocks further use cases.

The '90-day' rule

When designing their open banking standards authorities in the UK and EU created a standard which became known as the 90-day rule. This forced aggregators to require their customers to go back to each data holder every 90-days to reauthenticate their request to continue sharing their information with a third-party.

This was an overly cumbersome way to achieve the goal of having customers stay aware of who they're sharing their data with. Drop off rates (where customers decided to stop using online banking) were above 50%, due to the task of re-authentication.

In 2021, the UK's [Financial Conduct Authority \(FCA\)](#) announced they would remove this re-authentication requirement to "help remove barriers to continued growth, innovation and competition in the payments and e-money sector."

We, along with the rest of the industry, welcomed this change. Our International Head of Growth said it removed "the burden from the end-user, while limiting the risk of the end-user potentially missing out on financial savings or keeping up to date with their finances."

New Zealand must learn from the UK's experience and adopt the FCA's amended approach of placing the responsibility to reauthenticate with the third-party providers. Rather than having to go back to your data holder every 90 days, you would simply need to reconfirm with the third party that you were happy for them to continue accessing your data.

Accreditation models

Becoming an Accredited Data Recipient (ADR) under a CDR framework can be an arduous task. Gaining full authorisation involves satisfying several

requirements with rightfully high bars around compliance, privacy, and security. This has the impact of restricting access to CDR-data to large firms who can afford to meet these requirements.

Australia's tiered accreditation provides a good model for New Zealand to learn from. Last year, [Treasury made amendments to its CDR framework](#) which introduced tiered accreditation. There are now various levels of accreditation available, which provide for different levels of access. Each level has a set of requirements that correspond to the access provided under that tier.

This means start-ups and smaller businesses can be authorised for limited access which means lower barriers to entry than what is required to become an unrestricted ADR.

New Zealand's CDR is focused on delivering positive outcomes for consumers. This requires a CDR that opens the door for competition and innovation. A tiered accreditation model is one of the best ways to ensure this is realised.

Closing Thoughts

New Zealand's financial sector is at an exciting stage with a growing fintech industry and a banking sector that seems ready to embrace open data to deliver additional benefits to consumers and the economy. It also finds itself in the advantageous position of being able to learn from the experience of key trading partners, including the UK and Australia.

Open banking is already here, as is demonstrated by other contributions to this report, and our Kiwi clients.

Introducing a consumer data right will provide additional impetus to financial markets, spurs competition, and will lead to better outcomes that

increase the financial wellness of New Zealand consumers.

Our international experience shows that providing consumers with access to and control over their data drives vibrant financial markets that deliver better outcomes and improved financial wellness.

We look forward to contributing to the future of New Zealand's financial services.

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In Profile – BlinkPay



Blink Pay NZ Limited (“BlinkPay”) is a Māori fintech that is focussed on building payment services in partnership with banks, using modern APIs. The BlinkPay vision is to “connect businesses, banks & consumers with world-class payment experiences.”

Their flagship product is Blink Bills, which is a bills dashboard that is embedded into a customer’s online bank and banking app. The bills dashboard allows a bank’s customers to view all of their bills in one place.

To enable this, BlinkPay is building an infrastructure layer that connects billers with the banks and, with the appropriate customer consent, the bank can present a customer’s bills in their online bank. From here, the customer can check bill amounts, due dates, and pay their bills safely and securely.

BlinkPay CEO and founder Daniel Karehana says,

“We believe that putting a solution as close to the problem as possible will create value. Our research found that

trying to quickly find and pay bills can be a problem. With Blink Bills, our aim is to put all of a customer’s bills in the same place where they manage their money.”

BlinkPay’s other go to market product is a digital payment gateway built upon the open banking standards established by Payments NZ. This service enables people to connect directly to their bank from a merchant shopping cart, log in, and pay directly from their bank account.

One of the advantages of leveraging the open banking standards is that all of the transaction data is pre-populated into the payment screen in the customer’s banking experience, thereby removing all payment issues associated with customer data entry errors.



BlinkPay was founded in 2018, because Daniel Karehana wanted to simplify the experience of paying bills. Notes Karehana:

“I was at work one day trying to pay my bills and became hōhā (annoyed) trying to log into different websites to find the right amount to pay for electricity, telephone and internet. What made it worse was I had left my rates bill on the fridge at home!”

BlinkPay is focussed on capturing a growing share of the payments market in New Zealand, and intends to build out its payments product-set when enduring payment consent (v2.2) is made available by the banks. This feature is part of the payment initiation API and it will enable bank customers to digitally set-up variable recurring payments. BlinkPay intends to use this capability to enhance their Blink Bills product, “and save customers from having to think about paying their bills each month.”

They are also looking to expand their services to include instore experience through a point-of-sale payment solution. Their ambition is to build an app enabled by open banking APIs, that allows customers to

quickly make payments from their smartphones using key features such as NFC.

BlinkPay are also heavily involved in the shaping of the financial services industry in New Zealand, with representation in API NZ business working group, technical working group and Payments NZ Council. They are also represented on the board of FintechNZ and are a member of the RBNZ CBDC (Central Bank Digital Currency) forum.

For further information, visit their website at <https://www.blinkpay.co.nz/>.



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