



CDR Data Quality assessment



Summary

In September 2024, the Office of the Australian Information Commissioner assessed Consumer Data Right (CDR) data holder obligations to take reasonable steps to ensure data disclosed in the CDR is up-to-date, accurate and complete, in accordance with CDR Privacy Safeguard 11.1. We focused on a single data holder, Westpac Australia Group (Westpac), and its policies and processes for maintaining the quality of consumer data disclosed in the CDR. Our object was to educate CDR participants about risks and best practice associated with ensuring consumer data quality.



Our findings

Overall, we found that Westpac had robust data quality management processes, including comprehensive systems to monitor and address data quality issues across the organisation, including within the CDR.

We did not identify high-level privacy risks in Westpac's data quality management processes. However, we did identify areas where Westpac could better identify privacy and data quality risks for its staff, and improve its reporting on data quality issues.



Recommendations

We made one recommendation and one suggestion for Westpac to improve its data quality processes.

We recommended Westpac review its CDR data quality incident reporting processes to provide a more comprehensive view of CDR data quality, which captures issues raised across the full range of internal and external sources. This should be supported by a documented process for review.

We suggested Westpac review its training materials for customer-facing teams to ensure they clearly explain relevant CDR privacy safeguards, and frame data quality and correction requirements as privacy obligations.



Takeaways

CDR data holders must take reasonable steps to ensure data they disclose through the CDR is accurate, up-to-date and complete.

Data holders should be able to actively identify, address and prevent data quality issues, and meet their obligation under Privacy Safeguard 11. In order to do this, data holders should ensure they have in place robust data collection practices, data quality monitoring processes, and governance and remediation frameworks.