

Topic: Conformance testing and reporting workstream

Date: 6-2-2019

Participants:

- **Members of Betaalvereniging Nederland (BVN)**
- **Representative of Verenigde Betaal Instellingen Nederland**
- **TPP's (to be licensed / DNB procedure)**
- **Representatives of Dutch Central Bank (DNB)**



Agenda:

14:00 Welcome & introduction (Gijs Boudewijn, BVN)

14:15 Detailing workstream '*conformance testing*' and '*reporting*' (Max Geerling, Luc van Oorschot, BVN)

16:15 Next steps & closing (Max Geerling, BVN)

Introduction

- Developments on EU-level (ERPB API access scheme and EBA working group on APIs) were reported
- DNB holds seat in EBA working group on APIs
- One of the goals of EBA working group on APIs is to identify common issues. This goal is in line with the goal of NISP-NL's '*Implementation coordination*' workstream

Conformance testing

- The conformance testing approach was elaborated in more detail
- Three options for collaboration in NISP-NL regarding conformance testing were presented
- The group opted for option 1 ('defining test scenarios as input') and option 3 ('standardising reporting on conformance test output') in NISP-NL collaboration
- Option 2 ('creating an independent Test-TPP for the purpose of conformance testing') was not opted for in NISP-NL collaboration
- As a result of these choices, NISP-NL will deliver conformance testing scenarios to AS-PSPs that they can use as input for their conformance testing, and NISP-NL will deliver a standardised reporting format for conformance testing output that AS-PSPs can use in reporting to the DNB under Guideline (GL) 6.3.b of the fallback exemption Guideline

- This approach minimizes extra effort from AS-PSPs as it allows them to perform proprietary testing approaches, while achieving a uniform reporting output as much as possible
- It was agreed that with the current approach for conformance testing, the official workstream will no longer be standalone, and will fall under the '*Reporting*' workstream

Reporting

- Questions were put forward with regards to the reporting deadlines of the fallback exemption procedure
- It was clarified that for some aspects of the 'part 1' deadline the required data cannot be available on 14-3-2019, and that for these cases the (AS-PSP internal) process of obtaining the data could to be delivered on 'part-1' deadline, but not the data itself
- Three main categories of reporting for the 'Part 1' deadline of fallback exemption process are identified:
 - '*Operational*' (includes GL 2.1, 2.2, 2.3a-d, 2.4a-c, 3.1, 3.2),
 - '*Testing*' (includes GL 4.1, 4.2, 4.3, 6.3b, 6.5) and
 - '*Qualitative compliance evidence*' (includes GL 5.1a-b, 5.2a-d, 6.1a-b, 6.2, 6.3.a, 6.4)
- For the '*Operational*' category a reporting template is proposed. This will be shared with NISP-NL participants for review and finalised before the 19-2 workshop. It was agreed by the group that GL 3.1 is out of scope for NISP-NL-wide collaboration
- It was noted that the reporting workstream focuses on standardising AS-PSP reporting output, and does not include discussions on how to obtain the data internally per AS-PSP
- It was discussed that AS-PSPs will check individually to what extent standing supervisory practices regarding stress testing are usable in reporting on GL 4.1, 4.2 and 4.3 (i.e. stress testing Guidelines)
- Reporting on GL 6.5, as GL 6.5 has been covered by NISP-NL in the deliverable "*TPP integration Testing checklist*" (available on the BVN website)
- Open Banking UK's Customer Experience guidelines are advised as a reference document for the GL 5 report (obstacles)

End remarks

- DNB indicated that they will host a second workshop (on 27-2-2019 in the afternoon) where they will elaborate on the fallback exemption procedure
- In order to achieve the goals of the NISP-NL collaboration, BVN emphasised the importance of TPP participation in NISP-NL. Especially the 12-2-2019 and 26-2-2019 meetings (see meeting planner on NISP-NL web page) are of value to both AS-PSPs and TPPs.