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Original Article

From Screen Scraping Towards Consumer-Driven Banking: Policy Reframing and the Institutionalisation of Financial Data Sharing in Canada

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Abstract

Canada's consumer-driven banking framework has evolved through changing policy objectives, governance arrangements, legislation, and proposed regulation. This study examines how federal policy framing and the institutional governance of consumer financial-data sharing developed between February 2018 and the September 16, 2026 corpus freeze date. Using longitudinal qualitative content analysis informed by interpretive policy analysis, the study examines official federal documents through a seven-dimensional coding framework.

The findings identify a shift from framing open banking primarily as an opportunity for innovation and competition towards recognising the security, privacy, and liability risks associated with existing screen-scraping practices. Subsequent policy development translated consumer empowerment into formal governance mechanisms involving consent, accreditation, liability, security, and supervision. This process accompanied the progressive institutionalisation of public regulatory authority, culminating in the 2026 statutory assignment of consumer-driven banking responsibilities to the Bank of Canada. However, formal institutionalisation preceded operational implementation, as the framework was not fully operational and screen scraping had not yet been prohibited at the corpus freeze date.

The study demonstrates how changes in policy problem representation can accompany the development of formal regulatory institutions without ensuring immediate operational transformation. Canada's experience contributes to the international financial regulation literature by illustrating the interaction between competition, consumer protection, regulatory authority, and the challenges of implementing emerging financial-data-sharing frameworks.

Categories: Banking and financial services, Political Economy, Fintech and Cryptocurrencies

Keywords: open banking, consumer-driven banking, canada, fintech, financial data, screen scraping, policy evolution, regulation

JEL Classifications: G28, G21, K23

Introduction

The digitalisation of financial services has altered relationships among consumers, financial institutions, and technology firms. Consumers generate transaction and account data that can support credit assessment, risk modelling, personalised products, and other data-driven financial services (Srivastava, 2025). Their ability to use those data outside the institutions that hold them, however, depends on institutional, technological, and regulatory arrangements. Open banking has emerged internationally as one response to this constraint.

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Although definitions vary, open banking generally enables consumers to authorise the transfer of financial information between financial institutions and approved third-party service providers. Recent reviews show that the concept joins several policy rationales, including data control, competition, innovation, consumer welfare, and financial inclusion, but jurisdictions differ in the obligations, standards, and governance models used to pursue them (Briones de Araluze and Cassinello Plaza, 2022) (Casolaro et al., 2025) (Colangelo and Khandelwal, 2025). Empirical work also indicates that the data access facilitated by open banking can lower entry barriers for financial technology firms, although market outcomes depend on the design of the regime and the capacities of participating organisations (Babina et al., 2025).

A growing body of research has come to treat open banking as an institutional and governance project rather than a narrow technological initiative. Regulatory standards can reconfigure industry roles and architecture (Dinçkol et al., 2023), while platform governance develops through continuing interaction among regulators, incumbent banks, and FinTech firms (Muthukannan et al., 2026). As such, government involvement becomes important where incumbent institutions have limited incentives to facilitate data access by potential competitors (Xie and Hu, 2024). These findings suggest that the design of authority, participation, accountability, and technical standards is central to understanding how open banking develops.

The consumer dimension adds a further governance problem. Perceived risk and initial trust affect consumers' intention to use open banking (Chan et al., 2022). Trust and security also recur across the wider FinTech adoption literature, where consumers must accept new organisations and technical relationships before data-driven services can produce benefits (Jafri et al., 2024) (Devlin et al., 2025). Financial inclusion is similarly conditional. Although open banking can expand access to useful services, its effects depend on product design, digital access, consumer capability, data quality, and safeguards against new forms of exclusion (Preziuso et al., 2023).

Canada offers a useful longitudinal case. The federal government did not introduce a complete regime at once. It moved through consultation, advisory review, collaborative design, policy statements, legislation, and proposed regulation beginning in 2018. The official terminology evolved from "open banking" to "consumer-directed finance" and later to "consumer-driven banking," but the labels did not operate as a clean chronological sequence. Throughout this paper, they are treated as evolving and partly overlapping official labels for the same federal financial-data-sharing initiative, rather than as three independent regimes. "Open banking" remained in use during the 2021-2022 implementation-design period after "consumer-directed finance" appeared in the 2020 Advisory Committee report; "consumer-driven banking" became the government's preferred term from 2023 onward. A terminology change is treated as substantively significant only when accompanied by a change in the policy problem, objective, institutional responsibility, system scope, or governance mechanism.

The changes extended beyond terminology to the official representation of the policy problem. Budget 2018 situated open banking within a programme of financial-sector innovation and competition. It presented data sharing as a way to empower consumers, enable more tailored services, improve affordability, and potentially increase financial inclusion (Department of Finance Canada, 2018). By January 2020, the Advisory Committee on Open Banking estimated that 3.5 to 4 million Canadians were already using services that relied predominantly on credential-based screen scraping. The Committee argued that the central question was no longer only whether Canada should enable data sharing, but whether a safer, rules-based framework could improve the existing market (Advisory Committee on Open Banking, 2020).

Beyond technological innovation

Open banking is often described through application programming interfaces (APIs) that enable authorised financial-data transfers. That description is technically accurate but institutionally incomplete. A functioning regime must determine who may participate, which data must be shared, how consumers authorise and withdraw access, who bears liability when harm occurs, which technical and security standards apply, how complaints are resolved, and which institution supervises compliance.

The comparative literature reinforces this point. Open-banking regimes combine different rationales with different approaches to mandated sharing and standardisation (Colangelo and Khandelwal, 2025). Dinçkol et al. show that UK regulatory standardisation required continuing adjustment among regulators and industry participants and altered

established roles (Dinçkol et al., 2023). Muthukannan et al. similarly describe platform governance in open banking as an adaptive process co-constructed by banks, regulators, and FinTech firms (Muthukannan et al., 2026). These studies shift attention from the API alone to the authority and relationships that make data exchange governable.

Data access can also change competitive conditions. Babina et al. find that open-banking access facilitated FinTech entry, supporting the competition rationale that appears in many policy programmes (Babina et al., 2025). Yet competition is not a self-executing outcome. Governments must decide the scope of mandatory participation, reciprocity, accreditation, and technical interoperability. Xie and Hu emphasise the role of public authorities in overcoming coordination problems and weak incumbent incentives (Xie and Hu, 2024).

These consumer-level findings also have institutional implications. Evidence that perceived risk and initial trust shape adoption (Chan et al., 2022), together with the wider importance of trust and security in FinTech adoption (Jafri et al., 2024) (Devlin et al., 2025), directs attention to the institutions through which data sharing occurs. Regulation therefore affects adoption through more than technical compliance. It defines the organisations, obligations, remedies, and supervisory relationships through which consumers are asked to share sensitive information.

Policy framing matters because different representations of the problem justify different interventions. Defining open banking mainly as a competition problem directs attention to access and market entry. Defining it as a security, privacy, or consumer-protection problem directs attention to accreditation, consent, liability, redress, and supervision. The analysis follows Bacchi's insight that policy can be studied by asking how the problem requiring government action is represented (Bacchi, 2009). It therefore examines official documents for both policy decisions and the assumptions that made those decisions appear necessary.

The importance of screen scraping

Screen scraping occupies a central position in Canada's policy development. In a screen-scraping arrangement, a consumer provides online banking credentials to a service that logs into the account and retrieves information on the consumer's behalf. This workaround enabled access to services for which demand already existed, but credential sharing could expose consumers and institutions to security, privacy, and liability risks (Advisory Committee on Open Banking, 2020).

The 2020 Advisory Committee did not recommend simply eliminating screen scraping. Removing the practice without a viable replacement would also remove services used by millions of Canadians. Open banking was therefore no longer only a prospective reform whose future merits could be considered. Government faced an existing market practice that demonstrated demand while exposing weaknesses in the regulatory status quo (Advisory Committee on Open Banking, 2020). This dual role of screen scraping, as evidence of demand and regulatory inadequacy, is central to the findings.

Although existing research explains open-banking models, consumer adoption, platform governance, and market effects, less attention has been devoted to how policy problem representations and institutional responsibilities evolve together during the development of a national financial-data-sharing framework. Canada provides a particularly useful case because its federal approach developed through successive stages of consultation, collaborative implementation design, statutory allocation of authority, and proposed regulation rather than through the introduction of a fully operational regime at a single point in time. The transition from a proposed hybrid governance model to statutory public supervision also provides an opportunity to examine how regulatory authority is formalised as the perceived policy problem changes.

The Canadian experience therefore contributes to the international literature by showing how competition-oriented objectives can become increasingly embedded within consumer-protection and supervisory arrangements, while the enactment of a regulatory framework may precede its operational implementation. This study addresses that gap through a longitudinal analysis of official federal policy and institutional development. The principal research question is: How did the federal policy framing and governance of consumer financial-data sharing in Canada evolve from February

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2018 to the September 16, 2026 corpus freeze date? Two subsidiary questions guide the analysis. First, how did the policy objectives and problems associated with open banking change during this period? Second, how did Canada's proposed governance architecture evolve in response?

The paper argues that Canada did not simply move incrementally from considering open banking to implementing it. Federal policy first presented open banking mainly as an innovation and competition opportunity. Recognition that consumer-permissioned data sharing was already occurring through screen scraping then transformed the status quo into a problem of unmanaged market risk. Policy development translated broad concepts of choice and control into mechanisms governing consent, security, liability, accreditation, technical standards, redress, supervision, and enforcement. By 2026, consumer-driven banking had acquired a statutory place within Canada's emerging regulated financial-data infrastructure, although implementation remained incomplete. This transformation in the representation and governance of the policy problem, rather than the chronology alone, is this paper's principal contribution.

Research Method

Research design

This study adopts a longitudinal qualitative policy case-study design to examine the development of Canada's federal consumer financial-data-sharing framework between February 2018 and the September 16, 2026 corpus freeze date.. Qualitative content analysis provides the principal method for systematically examining official policy documents, while interpretive policy analysis provides the analytical orientation for understanding changes in policy problem representation. Document analysis is appropriate because official institutional records provide direct evidence of changing policy objectives, formal responsibilities, and regulatory arrangements (Bowen, 2009). The coding procedure draws on qualitative content analysis (Schreier, 2012) and follows the preparation, extraction, analysis, and synthesis logic of the READ approach (Dalglish et al., 2020).

The primary interpretive framework draws on Bacchi's problem-representation approach, which examines how policy documents construct the problems that government intervention is intended to address (Bacchi, 2009). This perspective is complemented by an institutional-governance lens focusing on the formalisation of regulatory responsibilities, rules, and supervisory arrangements. Bacchi's approach is used as a sensitising framework rather than a complete application of the six-question WPR protocol (Bacchi, 2009). Together, these perspectives support analysis of both the changing justification for government intervention and the institutional architecture developed in response. The longitudinal design is appropriate for identifying continuity and change across successive policy, legislative, and regulatory stages. The study does not undertake causal process tracing or claim that a particular framing independently caused subsequent institutional decisions.

The purpose is to explain changes in the federal government's representation and governance of financial-data sharing. The study does not test whether consumer-driven banking will succeed, measure consumer willingness to adopt it, or estimate its competitive or distributional effects. These outcome questions require evidence beyond policy documents.

The period begins in February 2018, when the federal government formally announced a review into the merits of open banking, and ends on September 14, 2026, which was established as the corpus-freeze date. On that date, a final search of the Department of Finance Canada, Parliament of Canada, Canada Gazette, and Bank of Canada sources was completed, and no documents published after that date were included. The endpoint captures the revised Consumer-Driven Banking Act, which received Royal Assent on March 26, 2026, the proposed Consumer-Driven Banking Regulations published on June 27, 2026, and the Bank of Canada's description of its new supervisory responsibilities. At the cutoff date, the proposed regulations had not become final, implementation was intended to occur in stages, and the statutory prohibition on screen scraping was not yet in force (Department of Finance Canada, 2026) (Parliament of Canada, 2026).

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Operationalisation of key concepts

Two concepts organise the analysis: policy reframing and institutionalisation. Policy reframing refers to a substantive change in the official representation of the problem requiring government intervention, the objectives associated with intervention, or the justification for particular governance arrangements. Drawing on Bacchi's problem-representation approach, reframing was identified through documentary changes in stated policy problems, objectives, representations of consumers, and proposed regulatory responses (Bacchi, 2009). Terminological changes alone were not treated as reframing unless accompanied by substantive changes in these dimensions.

Institutionalisation refers to the progressive formalisation of policy objectives through identifiable organisational responsibilities, statutory authority, governance rules, and supervisory mechanisms. For the purposes of this study, institutionalisation was examined through documentary indicators including the designation of implementation leads and responsible institutions, the introduction of legislative provisions, changes in supervisory mandates, and the specification of accreditation, liability, security, consent, and enforcement arrangements. These indicators were used to assess how broad policy objectives became embedded in increasingly formal governance structures.

To distinguish formal institutional development from practical implementation, the analysis considered three levels of policy change: legislative development, reflected in enacted statutory provisions; regulatory development, reflected in proposed or finalised requirements and supervisory arrangements; and operational implementation, reflected in the actual commencement and application of the framework. This distinction enables the analysis to separate the formal establishment of regulatory authority from its practical exercise. The documentary corpus provides evidence primarily of the first two levels and of officially reported implementation status. It does not independently establish changes in consumer or institutional behaviour.

These concepts were operationalised through the seven coding dimensions presented in Table *2*. Consistent with qualitative content analysis (Schreier, 2012), the framework combines predetermined analytical categories with inductively refined subcodes to support systematic comparison across documents. The four analytical phases were identified by examining substantive changes across these dimensions rather than treating official terminology or document publication dates as sufficient evidence of institutional change.

Document selection and corpus

Documents were selected purposively from official federal sources. An item was included if it (1) was issued by a federal institution or an advisory body formally appointed by the federal government; (2) had been published, enacted, or formally proposed and was publicly available by the corpus freeze date; and (3) established, materially modified, or operationalised the policy framework. Working-group meeting packages were included because they documented the translation of broad policy principles into design questions. The study excluded media commentary, industry advocacy, provincial initiatives, international policy documents, duplicate versions, and stakeholder submissions outside the official implementation archive.

The final corpus contains 39 items. The core corpus consists of 15 policy, legislative, implementation, regulatory, and supervisory documents, each identified separately in Table *1*. The supplementary corpus consists of 24 dated working-group package records from the Department of Finance Canada implementation archive: six accreditation packages, six liability packages, six privacy packages, and six security packages. Twenty-three substantive meetings were held. The security package dated August 25, 2022, was retained for corpus completeness, although the scheduled meeting was cancelled and the archive contains no separate substantive outcomes for that meeting. Appendix A, Table *4*, identifies all 24 package records individually and records the cancelled security meeting separately from the 23 substantive meetings.

The distinction between 15 core documents and 24 consultative packages produces the reported corpus total of 39 items. The official implementation archive also contains a Steering Committee presentation dated December 7, 2022. It was screened but excluded from the supplementary corpus because it was a cross-group implementation update rather than a package from one of the four issue-specific working-group series.

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The working-group materials are analytically distinct from final policy. They record consultative deliberation, discussion guides, and reported outcomes rather than authoritative government decisions. They are used to examine how general principles were converted into design choices, not as evidence that every proposal or point of agreement was later adopted.

The corpus was designed to capture the principal stages of federal policy development relevant to the research question rather than every public statement or stakeholder intervention concerning open banking. The 15 core documents provide the principal evidence for examining changes in official policy framing, institutional responsibilities, statutory authority, and implementation status. The 24 supplementary working-group packages provide contextual evidence of how broad policy principles were translated into implementation-design questions concerning accreditation, liability, privacy, and security. This distinction establishes an evidentiary hierarchy between authoritative policy instruments and consultative records. The corpus is therefore suitable for examining documented federal policy evolution, while its scope does not permit comprehensive conclusions about private stakeholder negotiations, provincial policy development, or market outcomes.

ID	Date	Issuing body	Core document	Status
C01	February 27, 2018	Department of Finance Canada	Budget 2018: Strengthening and Modernizing Canada's Financial Sector	Policy statement
C02	January 2019	Department of Finance Canada	A Review into the Merits of Open Banking	Consultation document
C03	January 2020	Advisory Committee on Open Banking	Consumer-Directed Finance: The Future of Financial Services	Advisory report
C04	2021	Advisory Committee on Open Banking	Final Report: Advisory Committee on Open Banking	Advisory report
C05	March 22, 2022	Department of Finance Canada	Government Moves Forward with Open Banking and Names a Lead	Implementation statement
C06	July 2022	Department of Finance Canada	Terms of Reference for the Open Banking Working Groups and Steering Committee	Implementation instrument
C07	December 2022	Department of Finance Canada	Consumer-Driven Banking Implementation: Progress Update, December 2022	Implementation update

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C08	November 21, 2023	Department of Finance Canada	2023 Fall Economic Statement: Policy Statement on Consumer-Driven Banking	Policy statement
C09	April 16, 2024	Department of Finance Canada	Budget 2024: Canada's Consumer-Driven Banking Framework	Policy framework
C10	June 20, 2024	Parliament of Canada	Budget Implementation Act, 2024, No. 1, S.C. 2024, c. 17	Enacted legislation
C11	December 16, 2024	Department of Finance Canada	2024 Fall Economic Statement: Canada's Complete Framework for Consumer-Driven Banking	Policy framework
C12	November 4, 2025	Department of Finance Canada	Budget 2025: Canada's Consumer-Driven Banking Framework	Budget policy statement
C13	March 26, 2026	Parliament of Canada	Budget 2025 Implementation Act, No. 1, S.C. 2026, c. 3	Enacted legislation
C14	June 27, 2026	Department of Finance Canada	Consumer-Driven Banking Regulations	Proposed regulations and regulatory impact analysis
C15	Undated; accessed September 14, 2026	Bank of Canada	Consumer-Driven Banking	Supervisory mandate webpage

TABLE 1: Core Document Corpus and Document Status

Source: Author's compilation from the official Government of Canada and Bank of Canada documents identified in the reference list.

Coding and analysis

The analysis combined deductive and inductive coding. Seven main dimensions were defined from the research questions and the policy-analysis literature before the full coding cycle: policy problem, policy objective, conception of the consumer, institutional architecture, governance mechanisms, system scope, and implementation. Subcodes were refined during an initial chronological reading as recurring concepts appeared. These concepts included innovation, competition, screen scraping, data control, financial inclusion, trust, privacy, security, consent, accreditation, liability, redress, technical standards, supervision, enforcement, interoperability, and data mobility.

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The unit of analysis was a paragraph, recommendation, statutory provision, or discrete section that addressed consumer financial-data sharing. Each core document was read chronologically and summarised in a document-by-code matrix. The resulting document-extraction matrix records the policy problem, policy objective, consumer conception, institutional architecture, governance mechanisms, system scope, implementation status, key evidence, qualifying evidence, and source location for every corpus item. The document-extraction matrix, coding framework, document-level coding outputs, and corpus audit trail are retained by the author and are available upon reasonable request.

The working-group packages were then coded using the same framework, with their consultative status recorded separately. Terminological changes among open banking, consumer-directed finance, and consumer-driven banking were coded but were not treated as substantive change on their own. A change was classified as substantive only when it was accompanied by a change in the stated policy problem, objective, institutional responsibility, scope, or governance mechanism.

Analysis proceeded in three cycles. The first cycle applied the seven main dimensions to each document. The second compared coding summaries across time to identify continuity, turning points, and changes in institutional responsibility. The third returned to the source documents to test whether the proposed phase boundaries were supported by formal changes in mandates, policy statements, legislation, or regulatory design. The four phases were retained because each begins with an observable shift in the policy problem or governance architecture, rather than a change in terminology alone. Accordingly, the four analytical phases do not correspond mechanically to the three official labels.

The analysis was conducted by a single researcher, and inter-coder reliability was therefore neither calculated nor claimed. Instead, methodological rigour was addressed through qualitative trustworthiness procedures emphasising credibility, dependability, and confirmability. Credibility was supported through repeated examination of the 15 core documents, comparison of interpretations with contrary or qualifying passages, and reconsideration of the proposed analytical phase boundaries against the original sources. Dependability was supported by a documented coding framework, defined units of analysis, a retained document-extraction matrix, and a corpus audit trail. Confirmability was strengthened by recording source locations, distinguishing authoritative policy instruments from consultative materials, and maintaining a traceable connection between documentary evidence and analytical interpretation.

The codebook combined predetermined analytical dimensions with inductively refined subcodes, allowing recurring concepts to be incorporated while preserving consistency across documents. Coding units were defined semantically rather than by fixed length because the source documents differed substantially in form. A passage could receive more than one code. Coding was qualitative and comparative; the number of coded passages was not treated as a measure of policy importance. Phase boundaries were determined primarily from substantive changes recorded in the 15 core documents, while the working-group packages were used to elaborate implementation-design mechanisms rather than establish independent phase boundaries. These procedures strengthen analytical transparency and consistency but do not eliminate the interpretive limitations of a single-researcher design. Table *2* defines the final coding framework.

Dimension	Coding question	Illustrative indicators
Policy problem	What condition is represented as requiring action?	Limited competition, unsafe screen scraping, fragmented rules, weak accountability
Policy objective	What result is intervention expected to achieve?	Innovation, competition, financial well-being, inclusion, safety, international competitiveness
Consumer conception	How is the consumer represented?	Data holder, authorising actor, vulnerable user, rights bearer, protected participant

Institutional architecture	Which organisations and relationships constitute the regime?	Banks, credit unions, FinTechs, payment service providers, regulators, standards bodies
Governance mechanisms	How are conduct and accountability organised?	Accreditation, consent, liability, redress, security, supervision, enforcement
System scope	What participation, data, and functionality are covered?	Mandatory or optional participation, read access, write access, reciprocity, included accounts
Implementation	How and when is the framework expected to become operational?	Lead appointments, working groups, legislation, regulations, phased commencement

TABLE 2: Coding Framework

Source: Author's creation based on the research questions, interpretive policy-analysis literature, and iterative coding of the document corpus.

Across the seven coding dimensions, Phase I combined an opportunity framing with the emergence of unmanaged-market risk under advisory review. Phase II translated consumer control into common rules, accreditation, technical specifications, and a proposed hybrid governance model. Phase III made statutory public administration, enforcement, and supervision central, first through a government-led entity and subsequently through the Financial Consumer Agency of Canada (FCAC). Phase IV reassigned these statutory responsibilities to the Bank of Canada and connected future expansion with payments and wider data mobility, while implementation remained incomplete. The boundaries were therefore based on changes in problem representation, institutional responsibility, system scope, governance mechanisms, and implementation status, rather than terminology alone.

Results And Discussion

The findings are organised into four analytical phases identified through changes in official problem representation, institutional responsibility, and governance mechanisms. Table *3* summarises the principal documentary markers supporting these phases and distinguishes changes in policy framing from formal institutional development and operational implementation. The phases are analytical rather than mutually exclusive stages, as policy objectives and governance arrangements continued to overlap and evolve.

Phase	Principal documentary evidence	Policy reframing	Institutional and implementation markers
Phase I: 2018–2020	C01: Budget 2018; C02: 2019 Consultation; C03: 2020 Advisory Report	Open banking shifts from a prospective innovation and competition opportunity toward recognition of existing security, privacy, and liability risks associated with screen scraping.	Federal review and advisory recommendations; no statutory operating framework.

Phase II: 2021–2022	C04: 2021 Final Report; C05–C07: implementation statements and updates; supplementary working-group materials	Consumer control becomes increasingly associated with consent, accreditation, security, liability, and technical standards.	Proposed hybrid governance model, appointed implementation lead, and consultative working groups; no operational statutory regime.
Phase III: 2023–2024	C08: 2023 Fall Economic Statement; C09: Budget 2024; C10: 2024 legislation; C11: 2024 Fall Economic Statement	Consumer protection, system integrity, and accountability acquire more explicit institutional expression.	Government-led governance proposal, statutory administration assigned to FCAC, and foundational legislative architecture established.
Phase IV: 2025–2026	C12: Budget 2025; C13: 2026 legislation; C14: proposed regulations; C15: Bank of Canada supervisory information	Financial-data sharing becomes increasingly connected with payment initiation, broader data mobility, and regulated financial infrastructure.	Statutory responsibilities assigned to the Bank of Canada; detailed regulations proposed; operational implementation incomplete at the corpus freeze date.

TABLE 3: Documentary Markers of Policy Reframing and Institutionalisation

Source: Author's analysis of the core documentary corpus and supplementary working-group materials identified in Tables 1-4.

Phase I, 2018-2020: From market opportunity to unmanaged market risk

The earliest federal framing associated open banking with economic opportunity. Budget 2018 placed the proposed review within efforts to foster innovation and competition. FinTech was described as capable of increasing competition, improving the affordability and usefulness of services, and increasing financial inclusion. Open banking could empower consumers to share data and enable providers to offer more tailored products. The initial representation was therefore predominantly prospective. Government was examining whether greater access to financial data could produce economic and consumer benefits (Department of Finance Canada, 2018).

The January 2019 consultation retained this orientation. Its stated purpose was to assess the merits of open banking, although it also invited evidence on consumer confidence, privacy, security, and implementation. The consultation recognised that governments in other jurisdictions had helped develop systems that attempted to balance benefits and risks. The policy question, however, remained framed as a decision about whether Canada should proceed (Department of Finance Canada, 2019).

The 2020 Advisory Committee report marked the first major reframing. Information supplied by stakeholders during the consultation and reported by the Advisory Committee in January 2020 indicated that approximately 3.5 to 4 million Canadians used data-driven financial services, most often through screen scraping. The report did not present this figure as a population survey or disclose a sampling or estimation method. The relevant comparison was therefore not between open banking and a world without consumer financial-data sharing, but between a regulated framework and an existing, largely unstructured market (Advisory Committee on Open Banking, 2020).

This recognition changed the regulatory logic. Screen scraping could require consumers to disclose credentials and created uncertainty about security and liability, but prohibiting the practice would not eliminate demand. The Committee consequently described a role for government in establishing guardrails that could protect consumers and

participants while permitting innovation. It recommended moving forward with consumer-directed finance as a safer improvement over the status quo (Advisory Committee on Open Banking, 2020).

The change from open banking to consumer-directed finance reinforced the emphasis on consumer control rather than unrestricted opening of banking information. The Committee described the proposed system as consumer-controlled, secure, and privacy-protecting, with individuals directing financial institutions to share information with accredited third parties. Terminology alone does not establish substantive change, but here the language accompanied a new rationale for public intervention (Advisory Committee on Open Banking, 2020).

The first phase therefore moved from a predominantly market-opportunity framing toward an unmanaged-market-risk framing. Innovation and competition remained important, but existing risks increasingly justified government action.

Phase II, 2021-2022: Building a governance architecture

The 2021 Final Report moved policy from establishing the merits of open banking toward designing the regime. Screen scraping remained a central justification. The 2021 Final Report stated that more than four million Canadians were then using screen scraping to share financial data and access financial-management tools. The report did not provide a new sampling frame or estimation method, so this figure should be understood as an updated official characterization rather than a directly comparable prevalence measurement (Advisory Committee on Open Banking, 2021).

The proposed institutional model was deliberately collaborative. The Committee rejected both an exclusively government-led model and an exclusively industry-led model. Its hybrid, made-in-Canada approach contained three foundations: common rules to protect consumers and allocate liability, an accreditation process for third-party providers, and technical specifications for safe and efficient transfer. An appointed lead would coordinate initial implementation while government developed a purpose-built entity for ongoing administration (Advisory Committee on Open Banking, 2021). The proposed scope combined mandatory participation by federally regulated banks with voluntary entry for provincially regulated institutions and accredited third parties. The initial functionality was limited to reciprocal, consumer-permissioned read access, while write access was deferred until the system was established.

The appointment of Abraham Tachjian as Open Banking Lead in March 2022 operationalised this approach. His mandate was to develop a Canadian regime based on the Committee's recommendations through engagement with industry, regulators, and consumer representatives. The mandate focused on common rules, accreditation, technical standards, and advice on the system's future administration (Department of Finance Canada, 2022a).

Four working groups then addressed accreditation, liability, privacy, and security. Their terms of reference made the groups consultative and placed them under the Open Banking Lead, supported by the Department of Finance. The December 2022 progress update reported consensus on some core elements while signalling a return to internal policy work before meetings resumed in 2023 (Department of Finance Canada, 2022b) (Department of Finance Canada, 2022c).

The meeting packages show how broad principles were decomposed into implementable questions. Privacy discussions addressed consent, expiry, revocation, data minimisation, standardisation of the customer journey, and the treatment of vulnerable consumers. Liability discussions considered complaints, traceability, redress, consumer responsibility, and allocation of loss. Security discussions examined baseline controls, proportionality, operational risk, incident management, and reporting. Accreditation discussions addressed entry criteria, continuing obligations, exemptions, suspension, and revocation (Department of Finance Canada, 2022d).

Consumer control consequently acquired institutional content. Control increasingly meant rules for authorisation, renewal, and withdrawal. Protection meant liability allocation and access to redress. Trust depended on accreditation, security requirements, reporting, and oversight. The working groups formed a bridge between policy principle and regulatory mechanism, even though their proposals were not final government decisions.

Phase III, 2023-2024: Statutory institutionalisation

By late 2023, the governance model had moved away from the hybrid arrangement proposed in 2021. The 2023 Fall Economic Statement policy statement identified three public-policy objectives: safety and soundness, consumer financial well-being and protection, and economic growth and international competitiveness. It organised the framework around governance, scope, accreditation, common rules, and technical standards. Most importantly, the 2023 policy statement assigned monitoring, supervision, enforcement, accreditation, and oversight of technical standards to an as-yet-unidentified government-led entity (Department of Finance Canada, 2023).

This was more than administrative refinement. The 2021 Committee had advised that implementation should be neither exclusively government-led nor exclusively industry-led. By 2023, statutory public supervision had become central to the architecture. The change indicates that federal policymakers increasingly treated data sharing as a regulated market activity requiring public authority, not only industry coordination.

Budget 2024 proposed FCAC as the administrator and supervisor of the framework. The framework would expand FCAC's mandate and establish statutory requirements for system participation, privacy, liability, security, technical standards, national security, and system integrity. The government explicitly linked consistent market-conduct protection with consumer confidence and trust (Department of Finance Canada, 2024a). System scope also became more prescriptive. The largest retail banks would be mandated to participate, other eligible institutions could opt in, and deposit, lending, and investment data would enter the framework through a phased approach.

The first Consumer-Driven Banking Act was enacted through the Budget Implementation Act, 2024, No. 1, which received Royal Assent on June 20, 2024. The statute established foundational governance, scope, and technical-standard provisions and assigned administration to FCAC, although operational commencement remained dependent on additional legislation, regulations, and coming-into-force provisions (Parliament of Canada, 2024).

The 2024 Fall Economic Statement then described a complete policy framework and announced the remaining planned elements, including accreditation, national security, liability, privacy, and a phased prohibition on screen scraping. The December 2024 framework stated that "about nine million Canadians" were currently sharing financial data by providing confidential banking credentials to service providers. The document did not disclose the estimation method or establish whether its population definition was identical to those used in the 2020 and 2021 reports. Security, liability, privacy, consumer protection, accreditation, and supervision were no longer secondary qualifications attached to an innovation policy. They constituted much of the framework's institutional substance (Department of Finance Canada, 2024b).

These three figures should not be interpreted as a harmonised adoption time series. The 2020 figure was stakeholder-supplied information about users of data-driven services, most often through screen scraping. The 2021 figure described Canadians using screen scraping to share financial data. The 2024 figure described Canadians providing confidential banking credentials to service providers. Because the sources do not disclose consistent sampling methods, denominators, or measurement definitions, the apparent increase cannot be treated as a measured growth rate.

The third phase can therefore be characterised as statutory institutionalisation. The federal response progressed from facilitating an ecosystem to constructing and authorising a publicly supervised framework.

Phase IV, 2025-2026: Statutory reassignment toward regulated financial infrastructure

A further institutional shift occurred in 2025. Budget 2025 announced the government's plan to transfer administration and oversight from FCAC to the Bank of Canada. At that point, the transfer was a policy commitment rather than a completed statutory or operational change. The government linked the choice to the Bank's supervision of payment service providers under the Retail Payment Activities Act and to the intended future extension of consumer-driven banking into payment initiation and other forms of write access (Department of Finance Canada, 2025).

The transfer matters because it moves consumer-driven banking closer to payments and financial-infrastructure regulation. Budget 2025 also connected the regime to a broader data-mobility agenda. It proposed an economy-wide data-mobility right for sectors with secure and interoperable frameworks and described consumer-driven banking as the

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first iteration. Future development was tied to write access, open finance, and open data (Department of Finance Canada, 2025).

The Budget 2025 Implementation Act, No. 1 received Royal Assent on March 26, 2026. It enacted the revised Consumer-Driven Banking Act and assigned statutory administration, supervision, accreditation, and enforcement responsibilities to the Bank of Canada. Royal Assent established the legal assignment of responsibility, but did not by itself place the full framework into operation (Parliament of Canada, 2026). Scope was subsequently connected to payment initiation and wider data mobility, while the proposed 2026 regulations contemplated staggered implementation across different account types.

The 2026 statutory reassignment should be distinguished from the FCAC's continuing responsibilities for financial consumer protection and market conduct. The 2024 Consumer-Driven Banking Act initially assigned administration to FCAC, whereas the revised legislation enacted in March 2026 assigned statutory administration and supervisory responsibilities under the consumer-driven banking framework to the Bank of Canada (Parliament of Canada, 2024) (Parliament of Canada, 2026). These responsibilities extend beyond the Bank's existing oversight of retail payment activities and include supervision of participating entities, monitoring of emerging consumer issues, and the promotion of competition in the interests of consumers (Parliament of Canada, 2026) (Bank of Canada, 2026). FCAC continues to exercise its separate mandate to supervise compliance with federal financial-consumer-protection requirements applicable to federally regulated financial entities (Financial Consumer Agency of Canada, 2026). The reassignment therefore represents a change in the statutory administration of consumer-driven banking rather than the elimination of FCAC's broader consumer-protection role.

As of corpus freeze date, the Bank of Canada described its statutory responsibilities as including future supervision of participating financial institutions, credit unions, payment service providers, FinTech firms, and third-party service providers. The Bank stated that it would develop a supervisory framework covering governance, risk management, operational resilience, monitoring, and evaluation (Bank of Canada, 2026). This statutory mandate is intended to connect consumer financial-data sharing with the Bank's wider regulatory oversight functions once the relevant provisions and regulations are in force.

The proposed Consumer-Driven Banking Regulations published in June 2026 extend the architecture through detailed accreditation, security, authentication, consent, reporting, record-keeping, assessment, technical-standard, national-security, and enforcement provisions. Their regulatory impact statement frames the absence of regulated consumer-driven banking as both a constraint on competition and innovation and a source of security, privacy, and liability risk (Department of Finance Canada, 2026).

The 2026 framework therefore brings the earlier policy rationales together. Competition, consumer choice, and innovation remain, but they are embedded within an infrastructure that manages entry, allocates responsibility, specifies conduct, and authorises public supervision. In this paper, "regulated financial-data infrastructure" is an analytical characterisation of the convergence of data sharing, payments, and public supervision; it is not a statutory designation.

Screen scraping as a policy catalyst

The findings show that screen scraping did more than provide an inferior technology for APIs to replace. It altered the government's policy baseline. Without existing data sharing, policymakers could have continued to assess open banking mainly as a prospective economic reform. Once millions of consumers were already using third-party services, inaction also carried consequences. The status quo contained security, privacy, liability, and consumer-protection risks (Advisory Committee on Open Banking, 2020) (Advisory Committee on Open Banking, 2021).

The critical question changed from whether Canada should enable consumer financial-data sharing to how Canada should govern data sharing that consumers were already undertaking. The 2020 report makes this shift explicit by refining the government's original questions after acknowledging the existing market. Screen scraping consequently functioned as evidence of demand and regulatory inadequacy.

This interpretation complements comparative research showing that open-banking models reflect several rationales at once and that regulatory design should be assessed against those rationales (Colangelo and Khandelwal, 2025). In Canada, the initial competition rationale did not disappear. It was joined by a risk rationale that made institutional safeguards a condition of continued data mobility.

The expanding role of the state

A second finding concerns the expansion of public authority. The 2020 report described government mainly as a catalyst, convenor, and setter of guardrails. The 2021 report formalised a hybrid governance model with substantial government and industry roles and a future purpose-built entity. The subsequent sequence moved from an appointed lead and consultative working groups, to a government-led entity, to FCAC, and finally to the Bank of Canada (Advisory Committee on Open Banking, 2020) (Advisory Committee on Open Banking, 2021) (Department of Finance Canada, 2022a) (Department of Finance Canada, 2023) (Department of Finance Canada, 2024a) (Department of Finance Canada, 2025).

The direction of change suggests that policymakers increasingly regarded financial-data sharing as an activity requiring established regulatory capabilities. The move to the Bank of Canada is especially important because the government's rationale links consumer-driven banking with supervision of payment service providers and planned payment-initiation functionality (Department of Finance Canada, 2025). Consumer-driven banking has therefore moved conceptually closer to regulated financial infrastructure.

This finding is consistent with research that treats open banking as evolving platform governance. Regulatory mandates require continuing adjustment of roles, access, standards, and control rather than a one-time act of technical opening (Dinçkol et al., 2023) (Muthukannan et al., 2026). The Canadian case adds a longitudinal example in which public supervisory authority became progressively more formalised in policy and statute, although operational supervision had not commenced by the corpus freeze date.

This trajectory should not be interpreted as an uncontested or inevitable progression toward public supervision. The 2021 Advisory Committee explicitly rejected both exclusively government-led and exclusively industry-led models in favour of a hybrid governance arrangement. The subsequent movement toward a government-led entity in 2023, statutory administration by FCAC in 2024, and reassignment to the Bank of Canada in 2026 demonstrates that institutional responsibilities remained subject to revision. The working-group materials also document different design considerations concerning accreditation, liability, privacy, and security. However, these consultative records do not establish that every proposal was adopted or that disagreements were resolved in a particular manner. The available evidence therefore supports an interpretation of evolving governance choices and documented institutional alternatives, but does not permit conclusions about undocumented stakeholder negotiations or the influence of particular actors on final decisions.

From consumer empowerment to institutionally produced control

Consumer control is visible throughout the policy record, but its practical meaning changes. Early documents describe consumers as empowered when they can use and transfer their data. Later documents represent meaningful control as dependent on institutional rules. Consent must be understandable, specific, time-limited where appropriate, renewable, and revocable. Liability must follow the data and provide access to redress. Security obligations must continue after entry. Accreditation must determine who may participate and when participation may be suspended or revoked (Department of Finance Canada, 2022d) (Department of Finance Canada, 2024b) (Department of Finance Canada, 2026).

By 2026, these mechanisms formed part of a statutory framework backed by supervisory and enforcement powers that had not yet become operational. Consumer empowerment in the Canadian model is therefore not simply freedom from restrictions on data movement. It depends on institutions that determine who can receive data, the conditions of access, the process for authorisation, the response to harm, and the authority responsible for compliance.

This distinction matters for trust. Consumers may formally possess a right to direct data without trusting the organisations, technologies, and remedies through which they exercise it. Prior research associates perceived risk and initial trust with intended adoption (Chan et al., 2022), while the broader literature shows that trust has organisational,

technological, and institutional referents (Jafri et al., 2024) (Devlin et al., 2025). The Canadian framework can be interpreted as an attempt to institutionalise conditions under which control and trust might become possible. Whether consumers experience those conditions as trustworthy requires separate empirical study.

Financial inclusion as a secondary policy objective

Financial inclusion appeared at the beginning of Canada's open-banking debate. Budget 2018 identified FinTech's potential to serve customers and markets that were not well served by existing products. The 2020 Advisory Committee discussed opportunities for consumers with non-traditional credit histories, women, newcomers, and financially marginalised groups while warning that poor design could worsen exclusion (Department of Finance Canada, 2018) (Advisory Committee on Open Banking, 2020).

The 2021 Committee recommended that inclusion be considered in system design. The privacy working group later discussed vulnerable consumers through accessibility, plain language, multiple service channels, education, rural connectivity, Indigenous communities, disability, and other barriers (Advisory Committee on Open Banking, 2021) (Department of Finance Canada, 2022d). These concerns align with research that treats open banking's inclusion effects as contingent on ecosystem design rather than automatic (Preziuso et al., 2023).

Financial inclusion did not become the framework's central organising principle. Competition, consumer protection, security, system integrity, and governance acquired more specific institutional expression. The policy record identifies inclusion as a potential benefit, but the existence of data-sharing infrastructure does not establish that underserved consumers will adopt or benefit from it. The coding therefore indicates a shift in institutional specificity rather than the disappearance of financial inclusion. Inclusion persisted as an anticipated benefit, including for lower-income and financially stressed households, but it was not developed as a standalone formal objective or matched by dedicated implementation mechanisms comparable to accreditation, liability, security, or supervision.

An incomplete transition

The title deliberately states that Canada has moved toward consumer-driven banking rather than completed the transition from screen scraping. The June 2026 proposal indicates that the statutory prohibition on screen scraping will commence only after further consultation and policy development, and other provisions are intended to enter into force in stages (Department of Finance Canada, 2026).

As of the corpus freeze date, it would therefore be inaccurate to describe the policy history as a completed replacement of screen scraping by regulated API-based sharing. Canada has constructed much of the legal and institutional basis for that transition, but the proposed regulations were not final and the framework was not fully operational.

This creates a policy paradox. Screen scraping was a principal justification for more comprehensive intervention, yet the practice that catalysed the project persists while the replacement framework is operationalised. The distinction between enacted architecture and realised transition is essential when assessing the current regime.

This paradox can be understood through the public-policy literature on implementation gaps, which distinguishes formal policy decisions from their translation into operational arrangements (Pressman and Wildavsky, 1973). It also relates to the concept of institutional decoupling, whereby formal institutional structures and actual organisational practices do not necessarily develop in parallel (Meyer and Rowan, 1977). In the Canadian case, statutory institutionalisation preceded the full operational implementation of consumer-driven banking. Although legislative responsibilities and proposed regulatory requirements had been established, the continued permissibility of screen scraping demonstrated that the intended transition to regulated financial-data sharing remained incomplete.

This distinction highlights a broader challenge in financial-data regulation during transitional periods. Legislative authority, regulatory specifications, supervisory capacity, and the technical arrangements required for implementation may develop at different rates. The resulting gap between formal regulatory architecture and operational practice illustrates why statutory enactment should not be equated with the completion of institutional change. However, the

documentary evidence does not establish deliberate institutional decoupling or identify the causes of implementation delays. Rather, it demonstrates that the formalisation of regulatory responsibilities can precede the practical transformation of existing data-sharing arrangements.

Limitations

The study has five limitations. First, it focuses on federal policy. Provincial and territorial regulation is relevant, particularly for credit unions and privacy law, but lies outside the corpus.

Second, official documents present institutional positions and recorded consultation outcomes. They do not directly capture consumer experience, private implementation work, or disagreements that were not documented. Accordingly, the documentary design establishes a sequence of official problem representations and institutional choices; it does not establish that a particular framing independently caused subsequent legislative or governance changes.

Third, working-group packages are consultative records and cannot be treated as adopted policy unless later documents confirm their inclusion.

Fourth, the analysis was conducted by a single researcher and did not include independent inter-coder reliability testing. Although credibility, dependability, and confirmability were supported through a documented coding framework, iterative codebook refinement, repeated document examination, a retained audit trail, source tracing, and consideration of contrary or qualifying evidence, these procedures do not eliminate the possibility of interpretive subjectivity. The findings should therefore be understood as a systematic and transparent qualitative interpretation of the documentary corpus rather than as independently validated coding judgments.

Fifth, the corpus freeze date captures a framework still in development. The proposed 2026 regulations could change before finalisation, implementation dates may shift, and supervisory practice has yet to be observed.

The findings explain policy framing and institutional development through the corpus freeze date; they do not establish effects on competition, security, consumer trust, participation, or financial inclusion.

Conclusions

Canada's movement toward consumer-driven banking shows how the meaning of a policy problem can change during policymaking. In 2018, federal policy associated open banking mainly with innovation, competition, consumer choice, and financial inclusion. By 2020, recognition that millions of Canadians were already sharing credentials through screen scraping changed the regulatory baseline. Policymakers were no longer deciding whether data sharing should exist. They were confronting an existing market whose risks could not be addressed by declining to introduce open banking. Between 2021 and 2023, broad principles were translated into governance mechanisms. Consumer protection became associated with liability and redress. Consumer control acquired rules for consent and revocation. Security became a continuing participant obligation. Market participation became subject to accreditation, and technical interoperability became an object of governance. Between 2023 and 2026, these mechanisms acquired a statutory basis for future public administration and supervision. The anticipated hybrid model evolved toward statutory public administration and supervision, while industry and advisory bodies retained implementation and technical roles. FCAC was assigned the initial statutory role in 2024, Budget 2025 announced a planned transfer to the Bank of Canada, and the 2026 legislation reassigned statutory responsibility to the Bank. At the corpus freeze date, however, the Bank was still preparing its supervisory framework, and operational supervision had not commenced. The 2026 reassignment concerns statutory responsibilities under the Consumer-Driven Banking Act and does not displace FCAC's broader financial-consumer-protection and market-conduct mandate. The Bank of Canada's responsibilities under the revised framework extend beyond its existing oversight of retail payment activities to include supervision of consumer-driven banking participants and compliance with applicable requirements. FCAC continues to supervise federally regulated financial entities in relation to their separate financial-consumer-protection obligations. The resulting institutional arrangement therefore involves distinct but potentially intersecting regulatory responsibilities, rather than a strict division between infrastructure oversight and consumer protection.

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This trajectory has two implications. First, open banking is not only a technological intervention that facilitates API access. It redistributes rights and responsibilities and creates standards, entry conditions, remedies, and supervisory relationships around financial data. Second, detailed policy architecture does not establish that intended consumer outcomes will occur. Canada's framework contains mechanisms intended to support security, accountability, control, and confidence. Whether those mechanisms produce trust, meaningful participation, competition, and financial inclusion remains an empirical question. The Canadian experience offers three lessons for jurisdictions developing financial-data-sharing frameworks. First, consumer data mobility requires institutional safeguards involving consent, security, liability, accreditation, and supervision, rather than technical interoperability alone. Second, the transition away from existing data-access practices should be coordinated with the operational readiness of regulated alternatives, particularly where consumers already rely on services enabled by less secure arrangements. Third, the allocation of regulatory responsibilities should recognise the intersections among financial-data governance, consumer protection, and payments oversight while maintaining clear institutional accountability. These lessons suggest that effective financial-data regulation depends not only on the enactment of legal rights and obligations but also on the coordination of governance mechanisms and implementation arrangements. Future empirical research should examine whether the operational implementation of consumer-driven banking produces the intended improvements in consumer trust, data security, competition, and financial inclusion. Consumer surveys, stakeholder interviews, and administrative or market data could be used to assess participation, the effectiveness of consent and redress mechanisms, and the effects of accreditation and compliance requirements on FinTech firms. Comparative research could also investigate whether different regulatory governance arrangements influence implementation timelines, institutional coordination, and market outcomes. Such research would complement the present documentary analysis by evaluating the practical consequences of the institutional arrangements identified in this study. The Canadian case therefore illustrates both institutional progress and analytical caution. By the corpus freeze date, the federal government had enacted the legal architecture for consumer financial-data sharing and assigned its future administration and supervision to the Bank of Canada. It had not yet operationalised the complete framework or completed the practical transition away from screen scraping.

Appendices

Appendix A: Working-group meeting corpus

The supplementary corpus comprised 24 dated package records from the Department of Finance Canada Open Banking Implementation archive. These records were distributed equally across four working groups: accreditation, liability, privacy, and security. Each working group contributed six package records, producing the supplementary corpus total of 24 items.

Twenty-three substantive meetings were held. The third security meeting, scheduled for 25 August 2022, was cancelled because the previous meeting had addressed both data-security and cyber-security matters. Its official archive page was retained as package S03 to preserve the completeness and sequence of the government archive, but it was not treated as containing separate substantive outcomes.

The working-group packages included discussion guides, summaries of deliberations, reported areas of agreement, or combinations of these materials. They were used to examine how broad policy principles were translated into implementation questions concerning accreditation, liability, privacy, security, consent, redress, technical standards, reporting, and continuing participant obligations. Because the working groups served a consultative function, their materials were not treated as authoritative policy instruments or as evidence that every proposal discussed was subsequently adopted. Table *4* identifies every package record included in the supplementary corpus and confirms that all 24 records are accounted for without omission or duplication.

Package ID	Working group	Meeting	Date	Principal focus	Corpus status

A01	Accreditation	1	5 July 2022	Categories of accreditation criteria, including governance, financial capacity, privacy, security, and technical compliance	Consultative package; meeting held
A02	Accreditation	2	27 July 2022	Applicant information, organisational structure, business activities, internal governance, and proportionality	Consultative package; meeting held
A03	Accreditation	3	23 August 2022	Financial capacity, insurance, comparable guarantees, and the ability to meet potential liabilities	Consultative package; meeting held
A04	Accreditation	4	20 September 2022	Certification, testing, and evidence of compliance with technical, security, consent, and revocation requirements	Consultative package; meeting held
A05	Accreditation	5	19 October 2022	Entities subject to accreditation, exemptions, tiering, sponsored access, agents, and outsourcing arrangements	Consultative package; meeting held
A06	Accreditation	6	1 May 2023	Accreditation applications, continuing obligations, reporting, renewal, suspension, revocation, and appeals	Consultative package; meeting held

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L01	Liability	1	7 July 2022	Consumer liability limits and exceptions involving gross negligence, gross fault, or criminal conduct	Consultative package; meeting held
L02	Liability	2	26 July 2022	Complaints handling, redress, compensation, breach protection, and possible guarantor arrangements	Consultative package; meeting held
L03	Liability	3	18 August 2022	Traceability, transaction logging, API records, data in transit, and responsibility between participants	Consultative package; meeting held
L04	Liability	4	14 September 2022	Public accountability, incident reporting, complaints reporting, API performance, and public disclosure	Consultative package; meeting held
L05	Liability	5	12 October 2022	Legal relationships between participants, enforceable standards, uniform obligations, and allocation of liability	Consultative package; meeting held
L06	Liability	6	14 April 2023	Service availability, response times, data quality, remedies, technical performance, and reciprocity	Consultative package; meeting held

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PR01	Privacy	1	8 July 2022	Express consent, data minimisation, responsibility for collection, transparency, and vulnerable consumers	Consultative package; meeting held
PR02	Privacy	2	25 July 2022	Consent duration, renewal, expiry, revocation, data deletion, and continuing validity	Consultative package; meeting held
PR03	Privacy	3	16 August 2022	Public disclosure, clear terms, fees, complaints information, product communication, and consumer education	Consultative package; meeting held
PR04	Privacy	4	22 September 2022	Standardisation of consent, authentication, authorisation, and the consumer journey	Consultative package; meeting held
PR05	Privacy	5	20 October 2022	Consent-management dashboards, consent histories, revocation, inbound and outbound data, and reciprocity	Consultative package; meeting held
PR06	Privacy	6	17 April 2023	Protection of vulnerable consumers, accessibility, plain language, rural connectivity, disability, education, and Indigenous communities	Consultative package; meeting held

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S01	Security	1	6 July 2022	Risk-based security requirements, risk categories, proportionality, and minimum entry safeguards	Consultative package; meeting held
S02	Security	2	28 July 2022	Data-security and cyber-security frameworks, including NIST, ISO 27001, SOC 2, certification, and scalable controls	Consultative package; meeting held
S03	Security	3	25 August 2022	Cyber security, scheduled topic	Meeting cancelled; official archive page retained; no separate substantive outcome record
S04	Security	4	15 September 2022	Operational risk, fraud, business continuity, third-party risk, incident management, and assurance	Consultative package; meeting held
S05	Security	5	21 October 2022	Internal risk governance, senior accountability, independent security functions, control testing, training, and incident response	Consultative package; meeting held
S06	Security	6	18 April 2023	Continuing security reporting, self-attestation, third-party assurance, remediation, suspension, and revocation	Consultative package; meeting held

TABLE 4: Supplementary Working-Group Corpus

Source: Author's compilation from the Department of Finance Canada Open Banking Implementation archive, 2022 to 2023.

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Note: Package identifiers were assigned by the author to support corpus traceability. A denotes accreditation, L denotes liability, PR denotes privacy, and S denotes security. Inclusion of a package records its role in the consultative implementation process and does not indicate that its contents were adopted as final government policy.
API, Application Programming Interface; NIST, National Institute of Standards and Technology

Additional Information

Author Contributions

All authors have reviewed the final version to be published and agreed to be accountable for all aspects of the work.

Concept and design: Ishaan Srivastava

Acquisition, analysis, or interpretation of data: Ishaan Srivastava

Drafting of the manuscript: Ishaan Srivastava

Critical review of the manuscript for important intellectual content: Ishaan Srivastava

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- **Payment/services info:** All authors have declared that no financial support was received from any organization for the submitted work.
- **Financial relationships:** All authors have declared that they have no financial relationships at present or within the previous three years with any organizations that might have an interest in the submitted work.
- **Other relationships:** All authors have declared that there are no other relationships or activities that could appear to have influenced the submitted work.

Data Availability Statements

All 39 corpus records are publicly available through the official sources listed in Table 1, Appendix A, and the references. Table 2 reports the coding framework. The extraction matrix, codebook, coding outputs, and audit trail are available from the corresponding author upon reasonable request. No confidential or personally identifiable data were used.

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