



Energy retailer CDR policy assessment



Summary

In October 2023, the Office of the Australian Information Commissioner (OAIC) assessed the CDR policies of AGL Energy Group, Origin Energy Group and EnergyAustralia Group (initial retailers). The [full report](#) is available on our website.

CDR policies ensure CDR data is handled in an open and transparent way by allowing CDR consumers to understand how their CDR data will be managed, and how they can access and correct their CDR data or make a complaint.



Our findings

This assessment found that the initial retailers demonstrated strong compliance, meeting an average of 82% of the OAIC's minimum requirements under Privacy Safeguard 1 and the CDR Rules. In particular, the CDR policies contained all required information about how to correct CDR data, and the initial retailers had good governance and training systems to implement their CDR policies. To address areas for improvement, we generally recommended that the initial retailers include a higher level of detail in their CDR policies.



Recommendations

We made between 6 to 11 recommendations to each initial retailer to address non-compliance and privacy risks identified in this assessment. Most commonly, we recommended that the initial retailers include more information in their CDR policies about how CDR consumers may access CDR data, and the CDR consumer complaint handling process, including options for redress and review.

CDR policies must contain all the information required by the CDR legislation. Some of the CDR policies assessed referred to separate documents, such as complaints and dispute resolution policies, rather than incorporating required information in the CDR policy. This creates a risk that consumers will be unable to locate information required to access, correct and control their CDR data.



Takeaways

Similar principles apply to preparing a CDR policy, privacy policy or other customer-facing policy document. Organisations must ensure their policies address legislative requirements and provide a level of detail that readers will find genuinely informative and useful.

Organisations may also take a layered approach by providing a summary that links to the full CDR policy. However, the CDR policy itself should be a standalone document and must contain all information specifically required under the legislation.