

# Consumer Data Rights: Guidance, Compliance & Enforcement – Approach to guidance under the Consumer Data Right regime

Companion document to the CDR Guidance, Compliance & Enforcement Policy

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## Introduction

Clear, consistent, and accessible guidance is essential to the successful operation of the Consumer Data Right (CDR) regime. For participants to understand their obligations under the Customer and Product Data Act 2025, guidance must be easy to find, easy to follow, and aligned across all parts of the system. Producing high-quality guidance is therefore a core component of MBIE’s compliance approach and a key mechanism for supporting voluntary compliance and reducing the risk of misunderstanding.

To achieve this, MBIE develops all CDR guidance in line with New Zealand Government content and accessibility standards, including the DIA content design guidelines, the

New Zealand Government Web Standards, and plain-language principles. These standards ensure that published information is accurate, inclusive, and usable for diverse audiences.

This Guidance Approach sets out how MBIE will ensure guidance remains coherent, consistent, and fit for purpose. It provides a structured framework for developing information that helps participants understand what is required of them, how compliance will be monitored and enforced, and what support is available. It also explains how guidance will evolve over time as the regime matures and as MBIE learns from participant engagement, feedback, and emerging sector needs.

## Purpose

This Guidance Approach sets out how MBIE's Consumer Data Right (CDR) operations group will design, develop, and maintain guidance material that supports the effective operation of the Guidance, Compliance and Enforcement (GC&E) function under the Customer and Product Data Act 2025.

Its purpose is to ensure that all CDR guidance—whether online content, publications, templates, or support materials—is consistent, accurate, easy to understand, and aligned across the entire regime. Clear and cohesive guidance is essential for helping participants understand their obligations, reducing ambiguity, and ensuring the CDR system operates fairly, securely, and with confidence.

This document establishes the framework MBIE will use to achieve that. It outlines:

- Other GC&E documents this guidance approach connects with.
- The principles that will guide the development of all CDR information and advice.
- The outcomes CDR guidance must achieve for its audience.
- The approach GC&E will uphold to ensure guidance is coherent, accessible, and fit for purpose.
- How MBIE will review and adjust this approach every six months to ensure guidance remains relevant, accurate, and responsive to the needs of CDR participants.

## Related documents

This Guidance Approach is one of a group of documents that, collectively, create the framework for how MBIE delivers guidance, compliance, and enforcement functions under the Consumer Data Right. These documents align with and reference each other, ensuring participants receive consistent and coherent information, and includes:

- **CDR Compliance & Enforcement Posture** – the phased regulatory posture endorsed by MBIE’s CDR Steering Group.
- **CDR Guidance, Compliance & Enforcement Policy** – MBIE’s overarching regulatory approach under the Act, endorsed by MBIE’s CDR Steering Group.
- **CDR Guidance, Compliance & Enforcement Roadmap** – the forward, time-sequenced plan for GC&E delivery.
- **Enforcement Tools and Pathway** – the graduated enforcement model and the tools MBIE may use.
- **Guidance Approach (this document)** – the framework for how guidance will be produced, updated, and governed.

Additional resources will be developed as needed where gaps are identified, feedback is received, or new requirements emerge.

## Review cycle

This guidance approach will be reviewed:

- every twelve months: aligned with MBIE’s CDR GC&E maturity phases, or
- after major changes in government content standards, or
- after sufficient user feedback warrants changes to the existing approach.

Each review will update principles, outcomes, approach or templates as required. All updated versions will be published on the CDR website for transparency.

## Outcomes sought for readers

- **Confidence:** Participants understand their obligations and how to comply.
- **Ease of use:** Guidance is easy to find, read, and apply.
- **Trust:** Information is authoritative and consistent with legislation.
- **Engagement:** Participants feel supported and informed, reducing the risk of accidental non-compliance.
- **Consistency:** Guidance is aligned across all CDR materials so participants receive a single, coherent message.
- **Predictability:** Participants know what to expect from the regulator because guidance is regularly updated and follows a clear approach.

- **Accessibility:** Guidance meets NZ Government accessibility standards e.g. readable, inclusive, logical structure.
- **Practicality:** Guidance is actionable and explains what participants need to do, not just what the law requires.
- **Currency:** Guidance remains up to date and reflects changes in sector maturity, standards, and regulatory expectations.
- **Transparency:** Guidance clearly differentiates legal obligations from recommended best practice.

## Key Principles for CDR Guidance

MBIE's guidance will be developed and maintained according to the following principles:

1. **Clarity & accuracy:** Information will be correct, complete, and reflect current legislation and standards. Guidance will clearly distinguish between legal requirements and recommended best practice.
2. **Plain language:** Content will use simple, direct language to ensure accessibility for all audiences. Technical terms will be explained or linked to authoritative sources.
3. **Consistency:** Guidance will align with MBIE's content guidelines and maintain a consistent tone and structure across all materials.
4. **Transparency:** MBIE will clearly state the purpose of each guidance document and its relationship to the Act and regulations.
5. **Inclusivity & accessibility:** Guidance will meet accessibility standards, ensuring it is usable by people with diverse needs.
6. **Relevance & practicality:** Content will focus on what participants need to know and do, providing actionable steps and examples where appropriate.
7. **Adaptability:** Guidance will evolve as the regime matures, incorporating feedback from participants and responding to emerging risks.

## Approaches we will take in our guidance

To ensure guidance is clear, consistent, and easy to use, MBIE will take the following approaches when developing CDR GC&E guidance:

- **Use plain language & accessible design:** All guidance will follow NZ Government Web Standards and DIA content design guidance to ensure it is readable, inclusive, and accessible for diverse audiences.

- **Ensure consistency & coherence:** Guidance will align across all CDR GC&E resources, use consistent terminology, and clearly distinguish legal obligations from recommended best practice.
- **Reference authoritative sources:** Guidance will link to relevant legislation, technical standards, regulatory requirements, and related CDR materials so readers can easily find and verify source information.
- **Provide information in multiple formats:** Where appropriate, guidance will be delivered through step-by-step instructions, visual aids, examples, webinars, and other formats that support comprehension.
- **Prioritise practicality & usability:** Guidance will focus on what participants need to know and do, offering clear, actionable direction.
- **Review & update regularly:** Guidance will be reviewed and updated as the regime matures, feedback is received, or new sectors are designated.
- **Seek & incorporate feedback:** MBIE will actively welcome feedback to ensure guidance remains relevant, accessible, and fit for purpose.

## Have your say

Our guidance can only be effective if it achieves the outcomes intended and meets the needs of the participants in the CDR. Your input helps us know if we're getting that right.

If you have feedback on our guidance or would like to raise anything you believe MBIE should consider as part of its GC&E activities, we welcome your input.

You can get in touch via the contact details on the MBIE CDR website here:

<https://www.mbie.govt.nz/business-and-employment/business/consumer-data-right/who-to-contact-about-cdr>

or email us directly at [consumerdataright@mbie.govt.nz](mailto:consumerdataright@mbie.govt.nz).

Our GC&E guiding documents, such as this one, will be reviewed and updated regularly. Feedback received will help shape those updates and ensure the GC&E programme continues to evolve in step with the wider CDR ecosystem.

## References

For additional information on government content standards and development, refer to the links provided below.

- **DIA Guidelines:** <https://www.digital.govt.nz/standards-and-guidance/design-and-ux/content-design/>

- **NZ Government web standards:** <https://www.digital.govt.nz/standards-and-guidance/nz-government-web-standards>
- **NZ Government guidance on plain language:** <https://www.digital.govt.nz/standards-and-guidance/design-and-ux/content-design-guidance/writing-style/plain-language>.