



Privacy Commissioner  
Te Mana Matapono Matatapu

# Spot checks on Credit Reporters



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## Spot Checks – what and why use it?

- The spot check was conducted by a mystery shopper type process
- Mystery shopper is a research technique used widely by retailers, market research organisations, regulators etc., to measure quality and service standards or test compliance
- To get a better picture of how the three national consumer credit reporters meet their access requirements under the Credit Reporting Privacy Code 2004
- Using innovative tools to gain a snapshot of compliance rather than solely relying on complaints



## First pilot of a 'spot checks' on credit reporters

- The primary focus was to test the level of compliance by credit reporters with applicable access requirements
- To promote or maintain good practice among credit reporters
- The exercise was not undertaken to initiate direct enforcement
- An ethical policy was designed to address ethical issues that may arise

## Findings of the pilot

- The technique was useful to get an insight on how credit reporters met access requirements
- A picture emerged which was publically reported, revealing credit reporters response rate to access requirements and timeliness
- Side benefits: analysis of anonymous credit report also revealed a non-access area of compliance that was remedied and a requirement of a written transcript for codified repayment information which was missing was added to credit reports
- Full report on findings and methodology available on OPC website <https://privacy.org.nz/news-and-publications/commissioner-inquiries/spot-check/>

