

## Where to from here with the Review recommendations?

The review of Amendments No 4 and No 5 of the Credit Reporting Privacy Code resulted in 13 recommendations. Some recommendations were deliberately written in an open-ended way to allow for implementation by industry action with amendment to the Code held in reserve. The Office will engage with appropriate stakeholders to identify the most promising steps to take. Some recommendations simply anticipate Code amendment and in such cases the Office may proceed to draft the amendment and postpone stakeholder engagement until the later formal stages. The following material gives a general indication of how the Office plans to proceed.

The Office will also engage with the industry in relation to selected findings recorded in the report (see below). That might occasionally result in the identification of useful amendments to the Code. A supplementary report is in preparation on certain miscellaneous issues that were raised in a 2016 discussion paper. When that report is available, any findings or recommendations arising from that report may be explored with stakeholders in conjunction with the steps mentioned below.

Recommendation	Further steps
1. To avoid disrupting the completion of the roll out of CCR to the remainder of the credit sector, a cautious approach should be taken in the short term towards proposals for changes to the fundamentals of CCR in so far as those changes might affect credit provider systems.	This signals that a cautious approach to any proposals to change the fundamentals of CCR pending CCR reaching maturity on its current basis. This principally affects calls by some in the industry to add account balance information to CCR. A supplementary report will deal with the substance of that suggestion but this recommendation is related to timing. (See also recommendation 3.)
2. The industry should consider creating a public database of CCR participation and related metrics, perhaps using the ARCA Credit Data Fact Base as a model, to continue at least until CCR maturity.	The Office will explore with industry the benefits and feasibility of the industry creating a useful public database of participation rates and related metrics as has recently been done in Australia. If an industry resource does not prove feasible the Office may look to Code changes, or the use of the assurance reporting process, to generate reliable public information on participation rates, etc.
3. Until substantial evidence of benefits to individuals, their communities and the economy is available, the case does not exist to intrude further into individual privacy by adding additional classes of personal information.	When people trust that their information will be used as they have agreed, and accept that enough value will be created, they are likely to be more comfortable with its use. This acceptance is sometimes referred to as a social licence. The social licence for CCR in its current form may be said to be dependent upon the creation of certain value for individuals, the community and the economy. Social licence does not yet exist to go further by adding new classes of information such as account balance information.
4. Additional efforts should be taken by stakeholders to promote financial literacy around CCR as the uptake increases and the system matures.	The Office will discuss this recommendation with industry as there may be additional and better opportunities for initiatives in public education now that CCR is heading towards high participation rates and maturity.
5. Further steps should be taken, which may include amending the Code, to: <ul style="list-style-type: none"> <li>a) promote subject access; and</li> <li>b) support the role of CCR in responsible lending.</li> </ul>	The Office will discuss recommendation 5(a) with credit reporters, and 5(b) both with credit reporters and representatives of lenders, to identify the most promising steps to promote the objectives of this recommendation.

6. Consideration should be given to measures, including amending the Code, to enhance the effectiveness of the independent reviewer component of the accountability model.	The Office will discuss this recommendation with credit reporters to identify the most promising steps to promote the objectives of this recommendation.
7. The Code should provide for individuals to be notified of the imminent expiry of an extended suppression granted in relation to the risk of identity fraud.	An amendment to the Code will be prepared.
8. Steps should be taken to enable individuals more easily to obtain suppression across multiple credit providers.	The Office will discuss this recommendation with credit reporters to identify the most promising steps to promote the objectives of this recommendation including whether any amendment to the Code is necessary.
9. Without changing its fundamental structure and obligations, the Code's pre-screening terminology should be aligned with the Responsible Lending Code.	The Office will discuss this recommendation with credit reporters, representatives of lenders and with the Ministry of Business Innovation and Enterprise to identify the most promising steps to promote the objectives of this recommendation.
10. Consideration should be given to making the Code's prohibition on any credit reporter use of credit information to facilitate marketing, other than in respect of pre-screening, even clearer. The prohibition extends to any tools, services or arrangements that might be designed or have the effect of circumventing the prohibition.	An amendment to the Code will be prepared.
11. Steps should be taken by the industry to promote the wider adoption of quotation enquiries.	The Office will discuss this recommendation with credit reporters and representatives of lenders to identify the most promising steps to promote the objectives of this recommendation. The issue will also be explored with representative organisations of telecommunications service providers and utilities.
12. Consideration should be given to reducing the reporting period for previous enquiries.	The Office will discuss with credit reporters the possible reduction of the reporting period for previous enquiries from 5 years to 12 months.
13. The Code should be amended to provide a clearer access right to credit scores to which the no-charging requirement clearly applies.	An amendment to the Code will be prepared.

### Findings expected to be discussed with industry

The following items derived from the report's findings and commentary will be further explored with the credit reporters and, where appropriate, with representative associations of credit providers with a view to identifying useful action to address matters of concern.

- *Participation rates*: Participation rates of credit providers, telecommunications service providers and utilities and related matters such as building and measuring participation.
- *Australian developments*: The likely effects of the introduction in Australia of mandatory reporting. Relevant lessons from the PWC report and proposed amendments to Australian code.
- *Public benefits*: Demonstrating progress in achieving public interest goals such as competition, innovation, responsible lending, financial inclusion, financial literacy.

- *Underutilised code provisions:* Making fuller use of pre-screening; serious credit infringements; credit non-compliance action; driver licence number matching.