Friday 23 February 2018

Manager, Financial Services Unit

Financial System Division

The Treasury

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Dear Sir

**Mandatory Comprehensive Credit Reporting Draft Bill 2018**

Thank you for the opportunity to submit a response to the draft Bill on the mandatory supply of comprehensive credit reporting information (released 8 February 2018).

We support the intention of the draft Bill to fulfil the goals of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, passed by the Commonwealth Parliament without dissent. Information asymmetry between Credit Providers (CP) and consumers weakens competition in financial markets, is an impediment to responsible lending and reduces consumers’ ability to access credit at competitive prices.

Equifax is a global information solutions company. We use data, innovative analytics, technology and industry expertise to transform knowledge into insights that helps our customers make informed decisions. Headquartered in Atlanta, Equifax operates in North America, Central and South America, Europe and the Asia Pacific region.

Established as The Credit Reference Association of Australia in 1967, then as Veda and now Equifax, we have strong discipline in data governance across the personal information lifecycle and compliance with privacy principles. We continually invest in our data and security processes, systems, people and policies.

For more than a quarter of a century, credit reporting in Australia has been regulated by Part IIIA of the Privacy Act and the Office of the Australian Information Commissioner (OAIC). Credit Reporting Bodies (CRB), including Equifax, are subject to a significant transparency and accountability regime.

CRBs are required to annually publish information about access requests, corrections, complaints and serious credit infringements and a summary of monitoring and audit activities. This is augmented by the Notifiable Data Breach scheme which came into force in February 2018.

We support the Government’s intention to further assure the security of personal credit information and promote ongoing oversight of CRB data governance by stakeholders

As noted in the Explanatory Memorandum, the proposed amendments ‘*align Australia’s credit reporting system with comparable international systems, including the US, UK and New Zealand*’.[[1]](#footnote-1) Through our global presence, Equifax has extensive experience with comprehensive credit data regimes. Australians enjoy robust privacy protection particularly with respect to credit information.

We support the stated intention to align industry developed principles and standards with a mandatory comprehensive credit reporting regime. We welcome the opportunity to work with the Government to ensure key mechanisms of the draft Bill make sharing credit information secure and fair. Importantly, we do not lose sight of the key purpose of a comprehensive credit reporting regime; to benefit consumers by promoting efficient, competitive and equitable credit markets.

Regards

Matthew Strassberg

General Manager

External Relations Australia and New Zealand

1. Explanatory Memorandum, paragraph 1.28 page 7 [↑](#footnote-ref-1)