

14 May 2014

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Roger Clarke
Chair, for the Board of the Australian Privacy
Foundation
Australian Privacy Foundation
Email: chair@privacy.org.au

Dear Ms Lane & Ms Guthrie & Messrs Brody and Clarke,

Thank you for your letter of 14 April 2014. It has been referred to me for response as the executive responsible for our consumer credit bureau operations.

You have raised a number of important issues each of which I will address in turn.

1. Access to free credit reports
2. Compliance with the Credit Reporting Privacy Code (CR Code).

Access to credit reports

As Australia's oldest and largest credit reporting body, Veda has a long-standing commitment to providing consumers with their credit reporting information, annually providing around a quarter of a million reports through a variety of channels. Most often, reports are provided free, while some are paid for, usually for express delivery. In addition, Veda offers credit reports as part of various subscription services. The majority of requests however are for free credit reports; in fact, in March 2014, when the amendments to the Privacy Act 1988 came into force we provided four times the number of free credit reports as we did any of our paid consumer services.

Ease of Access

With the passing of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* Veda put in place a project, with a number of different streams of work, to address the sizable changes arising from these amendments.

One of the many project streams dealt specifically with consumer facing issues, including access.

This was a major piece of work which included updating or replacing IT infrastructure in a very short timeframe, these issues were exacerbated by late finalisation of the code and regulation changes that required significant revision to in-flight IT projects. In recent months we have experienced teething problems with some of the new IT infrastructure, resulting in slow workflow processes. This has coincided with unprecedented demand for free credit reports.

We have worked extremely hard to fix these teething problems and to ease waiting and response times and, most importantly, further efforts made to streamline the current process for requesting a free credit report.

In this regard, Veda is investing in the development of a new portal, aligning processes and requirements for free reports with those available for paid services. This too is a sizable undertaking but most relevant to your correspondence.

The new site will considerably ease the free report application process, allowing consumers to be able, online, to order and receive a copy of their free credit report. Consumers seeking a free report will have the same straight through process as applies for paid reports, that is, they will be able to type-in their information onto an on-line application form.

Advocates are aware of Veda's heavy obligations about security of information, particularly about ensuring we provide the right report to an applicant. I am pleased to advise you that new capabilities for on-line verification of identity means free reports will now undergo the same verification process as individuals who request one of Veda's paid services.

As you would appreciate, new systems require significant time and resources (technical and financial) to implement and, barring any unforeseen circumstances, we have targeted the new portal to be available around October 2014.

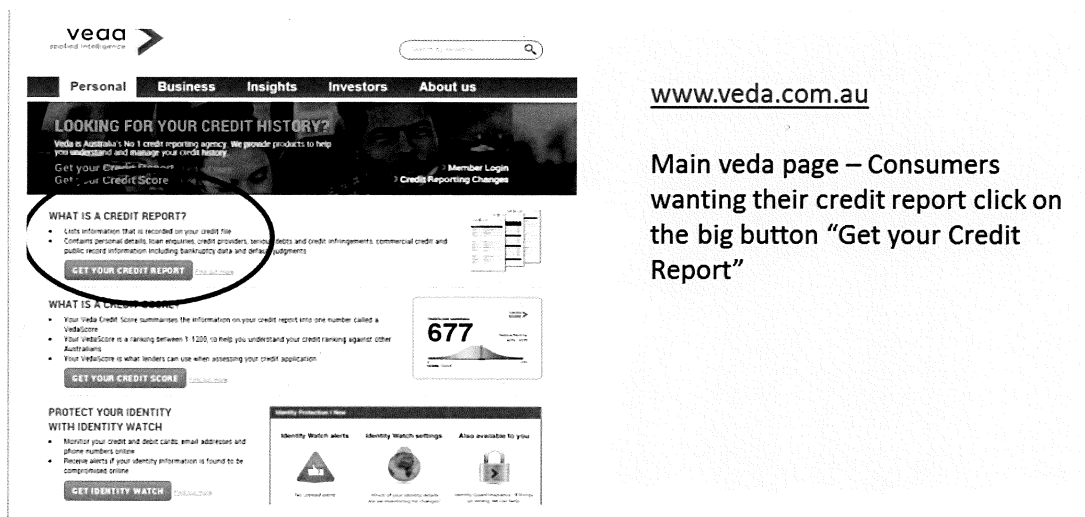
While Veda's new portal will simplify how consumers apply for their report and addresses concerns expressed about access, the current systems already meet our CR Code obligations, including access to

free reports. Despite assertions about the “very difficult free option”, in March 2014, when the start of new credit reporting regime resulted in heavier than usual demand, more than 80 per cent of consumers using the current website requested a free credit report over the paid service. In all, over 10,000 customers in March alone requested their free file.

This clearly demonstrates that Veda’s promotion of the free services is as prominent as the fee based service.


To assist your consideration, I also note the following about web pages and searches:

www.veda.com.au, is Veda’s main website and also its landing page. On this page a consumer can see information about access to credit reports as well as other Veda services:



The screenshot shows the Veda website homepage. At the top, there is a navigation bar with links for Personal, Business, Insights, Investors, and About us. Below this is a large banner area with the heading "LOOKING FOR YOUR CREDIT HISTORY?" and subtext "Veda is Australia's No 1 credit reporting agency. We provide products to help you understand and manage your credit history." There are two main buttons: "Get your Credit Report" and "Get your Credit Score". A red circle highlights the "Get your Credit Report" button. To the right of the banner, there is a "Member Login" link and a "Credit Reporting Changes" link. Below the banner, there are three sections: "WHAT IS A CREDIT REPORT?", "WHAT IS A CREDIT SCORE?", and "PROTECT YOUR IDENTITY WITH IDENTITY WATCH". Each section has a brief description and a "GET YOUR CREDIT REPORT" or "GET YOUR CREDIT SCORE" button. A red circle highlights the "GET YOUR CREDIT REPORT" button in the "WHAT IS A CREDIT REPORT?" section. To the right of the screenshot, there is a text box with the URL www.veda.com.au and the text "Main veda page – Consumers wanting their credit report click on the big button “Get your Credit Report”".

When consumers click on GET YOUR CREDIT REPORT, they are taken to Veda’s mycreditfile website which includes information about the information on credit reports as well as a large free file button:



My Credit Alert
Get your credit report to find where your credit history is accurate and update your credit file as requested under the updated law. You can request a free credit report every 12 months.

Buy Now
\$79.95 (GST included)

Your Credit Report is one of your most valuable assets. Take time to manage it.

- Personal Credit Report (requested within one working day)
- Smart alerts to changes on your credit file for 12 months

My Credit File, my credit reputation

Be informed. Your credit file is automatically updated by credit providers that you apply for credit. Your file is used by providers to determine if you are credit worthy.

Manage your credit reputation. By being informed you can more effectively manage your credit business file.

Keep credit and personal details right. By signing up for My Credit Alerts you can monitor changes to your credit file that you subscribe to My Credit Alerts. You will be notified by email within 24 hours if any of the following is added or changed on your credit file:

- Addresses
- Employment history
- Consumer credit accounts
- Debt or financial consumer credit accounts
- Commercial credit accounts
- Details of a credit consumer credit accounts
- Debtors
- Court judgments
- Travelling and holidays
- Consumer information
- Information that you have a current credit relationship with a credit provider
- Information that you have a credit history with a credit provider

Under your credit file, you can see a copy of your credit file requested in your credit report or when you request a copy of your credit file.

My Credit Alerts will also provide you with a copy of your credit file requested in your credit report or when you request a copy of your credit file.

Order My Credit Alerts and get everything the benefits of a credit report. Order My Credit Alerts for less than \$1.95 a week, you can better manage one of your most important assets.



There are certain circumstances under which you can get a copy of your credit report free of charge. If you have been declined on a credit application you have the right to access your credit report free of charge. If you have been declined on a credit application you have the right to access your credit report free of charge. If you have been declined on a credit application you have the right to access your credit report free of charge.

Buy Now

Free File Find out more

On the next page – Consumers wanting their free credit report click on the biggest button on the page button “Free File Find out More” – with text outlining circumstances in which a consumer can get their free report

Clicking on the large red button brings consumers to the free credit file page, below.

[Home](#)
[Personal](#)
[Business](#)
[Products and Pricing](#)
[Education](#)
[Corrections](#)
[About Us](#)
[FAQ's](#)
[Support](#)

How to get your credit report free of charge

There are certain circumstances under which you can get a copy of your credit report for free:

- If you have been declined on a credit application you have the right to access your credit report free of charge.
- If you have been declined on a credit application you have the right to access your credit report free of charge.
- If you have been declined on a credit application you have the right to access your credit report free of charge.

If you request a free copy of your credit report because you have been declined on a credit application you might be asked to supply a copy of the business notice with your application.

To obtain a free copy of your credit file, designated to you within ten working days, please complete the below Free Credit File form.

You will need to have the following information handy:

- Your full name
- Your date of birth
- Your driver's license number
- Your home of identification including:
 - A copy of your driver's license, passport, birth certificate or Proof of Age card, as well as
 - A document issued by an official body which includes your name and address (i.e. utility bill or bank statement)
- Your current residential address
- Your previous addresses
- Your current employer or a previous employer
- Name of the organisation to which you last applied for credit
- A daytime telephone number
- How you would like your file sent to you: via post, fax or email

Only you may request a copy of your credit file. For security purposes, prior to receiving your credit file you will be asked to verify your identity. You can obtain more detailed information regarding the process and use of personal information on our Privacy section.

Please note that credit file applications for the purpose of obtaining a gaming or credit license are not eligible for the free file service. Any applications for this purpose will need to be processed using the express service fee.

Express Service

Should you wish to receive your credit file sooner, an express delivery service is offered for \$95.95 and will

Latest News

Understanding the new credit reporting system

Business Credit: Establishing your business credit file

Business Credit for Small Business Owners

Very clear instructions on how to order your free credit file are provided

mycreditfile

veda

Home

Personal

Business

Products and Pricing

Education

Disputes

About Us

FAQ's

Support

Download Credit Report

Search

To help us provide a better service to you, please complete the following details to immediately receive a form to request a free copy of your credit report

First Name *
David

Surname *
scothamplio

Phone Number *
04145 17 100

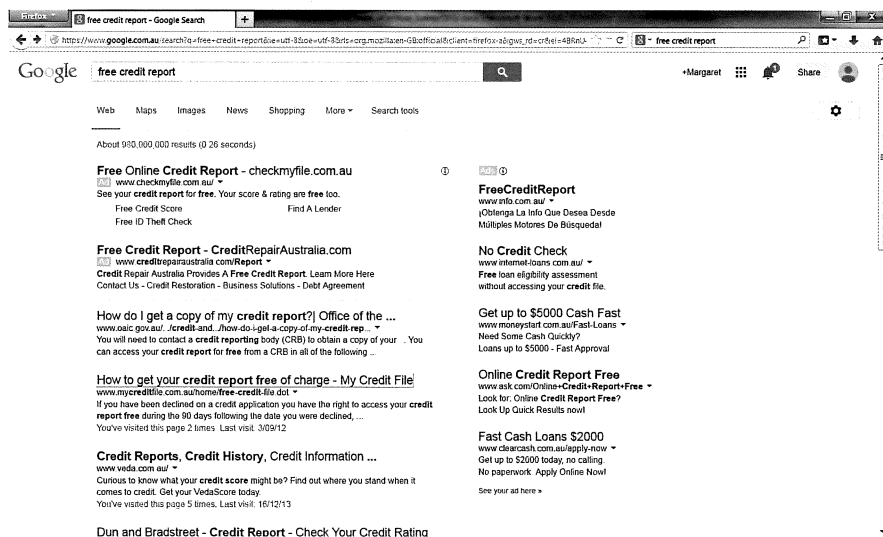
Email Address *
0414517100@gmail.com

Consent
☒ Yes
☐ No
On to consent to Veda collecting and the third parties use to the purpose of referring to, and other Veda services relating to our credit report

[Submit](#)

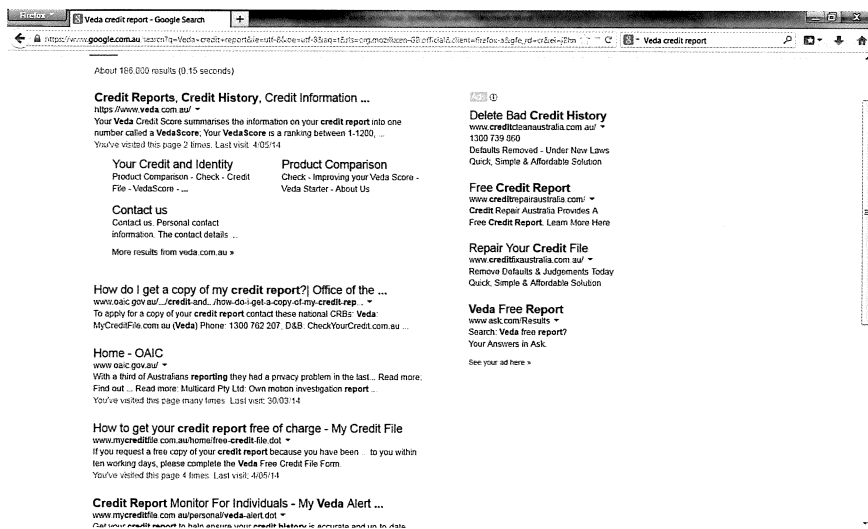
A consumer enters in details and the ordering form and instructions are emailed immediately to the consumer to complete

In addition, if individuals google “free credit report” there is a paid link to Veda’s www.mycreditfile.com.au” website and the second free site displayed is also the mycreditfile website. When consumers click on the link, they are taken straight to the “How to get your credit report **free of charge**” (*my emphasis*). See below.



Furthermore, Veda's yourcreditandidentity website, which is the portal for access to our paid scored services, is **not** displayed.

In addition to the above, a search on the terms “Veda Credit Report” returns the following response:



As you can see, the lead return is Veda’s main website, followed by two references to the OAIC, followed by Veda’s mycreditfile.com.au website. A search using “credit report” does not return the Your Credit and Identity reference.

Essentially, when an individual does a google search to obtain a copy of their credit report it is much easier to find the free report than the Your Credit and Identity.

Finally, I also note that all our websites, www.veda.com.au, www.mycreditfile.com.au and <http://www.veda.com.au/yourcreditandidentity> have a link to Veda’s credit policy which clearly sets out how individuals can obtain free access to their credit reporting information.

Telephone access

As you state, access to a free report by telephone is not an issue covered by the CR Code.

Nevertheless, even before the CR Code was introduced, Veda provided and continues to provide individuals with information over the telephone, about access to their credit report free of charge, namely:

- They are directed to our website to obtain the free file details; and
- There is an option for a recorded message to provide details on what is needed. This is a detailed message, outlining what is required to be supplied and where the request should be sent.
- The Act specifically addressed the needs of this potentially vulnerable group of individuals by allowing them to appoint a third party to assist them in dealing with Credit Reporting Businesses (CRBs).

Compliance with the CR Code

In your letter you allege that Veda is in breach of paragraphs 19.3(a) and 19.3(b) of the CR Code. Veda denies this.

My reasons are:

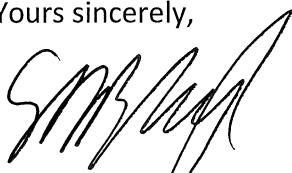
- Veda obligations are clear. Paragraph 19.3(a) states that information made available about the fee-based service “must prominently state that the individuals have a right under Part IIIA to obtain their credit reporting information free of charge” and the circumstances when that right arises. Paragraph 19.3(b) requires a CRB “take reasonable steps to ensure that its service, whereby individuals may obtain their credit reporting information free of charge, is as available and easy to identify and access as its fee-based service”.
- By your own admission, you state that Veda provides information over the telephone as to how an individual can obtain a copy of their credit report free of charge. In addition, the recorded message makes it very easy for an individual to identify and understand how Veda provides free access to credit reports.
- Where information about the fee-based service is available, the CR Code requires a CRB to provide information about free access. It does not oblige a CRB to provide free access per se in all cases, as you imply.

Veda has always taken its obligations very seriously. You will recall prior to the current Code, Veda provided unlimited free access to their credit reporting information, regardless of the reason for the request or the number of requests made by an individual; most recently, with the Code changing, more than 10,000 consumers accessed their free file in March alone.

And as noted above, Veda’s work on the new portal is well underway and will provide even further improvements to a consumer’s access to important credit information for free.

I trust my reply has addressed your concerns. For obvious reasons we have copied the OAIC into this reply. We are happy to keep the lines of communication open and discuss these matters further with you; please contact Matthew Strassberg of External Relations on (02) 9278 7838.

Yours sincerely,



Simon Bligh

Chief Data Officer