



AUSTRALIAN COLLECTORS &  
DEBT BUYERS ASSOCIATION

31 May 2024

Heidi Richards  
Independent Reviewer  
c/o Attorney-General's Department  
Information Law Branch  
Submitted via email to: [creditreporting@ag.gov.au](mailto:creditreporting@ag.gov.au)

Dear Ms. Richards,

**Review of Australia's Credit Reporting Framework – Issues Paper (April 2024)**

The Australian Collectors & Debt Buyers Association appreciates the opportunity to provide the attached Submission in response to the Review of Australia's Credit Reporting Framework- Issues Paper.

Please do not hesitate to contact the writer to discuss any aspect of the Submission.

Yours sincerely

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**Submission in Response to  
Review of Australia's Credit Reporting Framework –  
Issues Paper (April 2024)**

## Introduction

Australian Collectors & Debt Buyers Association (“**ACDBA**”) welcomes this opportunity to comment on the ‘Review of Australia’s Credit Reporting Framework – Issues Paper’ dated April 2024 (“**Review**”)

ACDBA was established in 2009 for the benefit of companies who collect, buy and/or sell debt. Our members (refer Appendix 1) represent the majority of the collection market in Australia.

ACDBA members do not issue loans directly, rather they acquire defaulted loan portfolios from banks and other financial institutions. As assignees of regulated credit contracts, our members have obligations under Part IIIA of the *Privacy Act 1988* (Cth) and the *Privacy (Credit Reporting) Code 2014*, and frequently interact with the credit reporting system.

We have not responded to all of the issues raised in the Issues Paper, however provide our perspective on those areas that are relevant to our member base.

## Response

### 1. Part One Question: The what and why of credit reporting

#### 1.1 How important is Australia’s credit reporting framework?

Australia’s credit reporting framework is critically important for ensuring financial and economic stability and protecting consumers. By reducing informational asymmetry between lenders and borrowers, it enables more accurate credit risk assessments, which help in preventing unsuitable lending and reducing the risk of default. The framework not only supports responsible lending practices, but also enhances consumer protections by providing a mechanism for fair and transparent credit reporting for any consumers participating in the Australian market. It is further notable that with the ever-expanding access consumers have to varying credit products and adjacent services, a “running history” of credit decisions can significantly assist consumers who may otherwise lose track of certain commitments. For these reasons, it is not only important that the Australian framework achieves its goals, but that it is simple, effective, and within a realm of compatibility to international benchmarks, thus ensuring a competitive and efficient credit market, essential for the overall health of the financial system.

### 2. Part Two Question: Strategic, historical and international context

#### 2.2 Has the policy rationale for regulating credit reporting changed or remained the same since the legislative framework was first adopted?

The policy rationale for regulating credit reporting has remained fundamentally consistent, focusing on protecting consumer privacy, ensuring fair access to credit, and helping lenders to avoid making unsuitable loans. However, the complexity of the legislative framework has increased over time, necessitating a call for simplification. The evolution of financial products and technological advancements has introduced new challenges, but the core objectives of transparency, fairness, and consumer protection remain unchanged. To better serve these objectives, it is crucial to streamline the regulatory framework, reduce redundancy, and simplify compliance requirements. This will ensure that the framework remains effective and accessible, both for consumers and industry participants.

### 3 Part Three Questions: Australia's credit reporting framework

#### 3.1 What are the main harms that the regulatory framework should seek to address today?

For the credit reporting system to help lenders avoid entering into unsuitable credit contracts, the information within the credit reporting system must have integrity. Where it doesn't, there is an increased potential for consumer harm.

The review must squarely tackle the significant and growing detriment caused by the for-profit credit repair sector. Such organisations typically operate on a no win, no fee basis, and routinely weaponise the Australian Financial Complaints Authority's ('**AFCA**') fee structure, or the threat of such imposts, to force credit providers to remove valid default listings. The AFCA scheme currently charges financial service providers almost nine thousand dollars<sup>1</sup> to determine complaints involving default listings. While AFCA's 'fast track' process was designed to make the adjudication of simple, single-issue complaints less expensive<sup>2</sup>, credit repairers have responded by broadening the number of complaint issues, adopting a 'kitchen sink' complaint strategy, to maintain the greatest possible leverage to achieve default removal and other commercial outcomes.

Between 1 July 2022 and 30 June 2023, AFCA received a record 96,987 complaints, a 34 % rise on the previous year, with many of these filed by credit repair organisations. Across our industry sector, 39.2% of all complaints to AFCA in that period had credit reporting as the primary issue.

We recommend that consideration be given to the formation of a dedicated credit listing review service under the control of the Office of the Information Commissioner, where complaints can be fairly, efficiently, expeditiously, and inexpensively adjudicated on a simple fixed cost recovery basis, reflective of the simple nature of credit listing disputes. Jurisdiction could then be removed from the AFCA scheme, ending the current exploitation which AFCA have been unsuccessful in managing since its formation.

In the alternative, AFCA's efficiency in determining credit listing complaints should be subject to review, and AFCA should be held to account to deliver efficiency improvements and cost savings to ensure that it can deliver on the efficient one stop shop for dispute resolution that was envisaged by the Ramsey Review. AFCA must be targeted on achieving efficiency improvements and cost reduction to reduce complaint costs and negate the leverage currently enjoyed by profit motivated credit repairers.

#### 3.2 How could the legislative framework for credit reporting be improved or simplified?

The legislative framework for credit reporting can be significantly improved and simplified by addressing several key areas. Firstly, the current system places an undue reliance on paper mail and a excessive use of notices that often achieve minimal consumer benefit. Moving towards digital communication channels would not only align with consumer preferences for low-touch, real-time interactions, but also enhance the efficiency and responsiveness of the credit reporting system.

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<sup>1</sup> The cost of determining a 'standard' or 'complex' complaint closed from 1 July 2023 is \$8,899.90 inclusive of GST.

<sup>2</sup> The cost of determining a 'fast track' complaint closed from 1 July 2023 is \$3021.50 inclusive of GST.

The complexity of the legislation, along with the intricate interplay between the Privacy Act, the Credit Reporting Code (CR Code), and various regulatory policies, principles, and schedules, makes it exceedingly difficult for adoption and implementation, highlighting the need for greater clarity and simplicity in the regulatory framework.

Additionally, consolidating and simplifying provisions within the Privacy Act and the CR Code can eliminate unnecessary complexity. By transferring detailed operational requirements from the Act to the CR Code, the framework can remain flexible and adaptive to technological advancements and market changes. This approach would also allow for more straightforward updates and adjustments to the Code, reflecting evolving industry practices and consumer expectations without the need for frequent legislative amendments.

Introducing standardised data formats, similar to the Metro 2 Code in the United States, can facilitate easier and more consistent data reporting across multiple credit reporting bodies (CRBs). This standardisation can reduce integration costs, encourage broader participation in the credit reporting system by allowing for multi-bureau reporting, and foster a more competitive and innovative market.

3.3 Should credit reporting legislation be more aligned with financial services regulation, including the regulation of consumer credit, and the Consumer Data Right?

Please see discussion in 3.2

3.4 Do the regulators have sufficient powers, resources and expertise to regulate credit reporting effectively?

Regulators such as the Office of the Australian Information Commissioner (OAIC) play a critical role in maintaining the integrity and transparency of Australia's credit reporting framework. However, there are opportunities to further enhance their capacity to regulate effectively.

Given the complexity of the credit reporting system and the rapid evolution of financial products and technologies, it is essential that regulators continue to develop specialised knowledge and expertise. Ongoing investment in training and resources will ensure that regulatory staff remain well-equipped to address emerging challenges and industry developments.

Collaboration between regulators and industry stakeholders is also key to effective regulation. By fostering open communication and working closely with industry participants, regulators can better understand the practical implications of their policies and identify areas for improvement. This collaborative approach can help ensure that the regulatory framework remains robust, fair, and responsive to both consumer needs and industry realities.

3.5 Is Arca's role in developing industry-wide credit reporting rules and standards appropriate?

The Australian Collectors & Debt Buyers Association (ACDBA) highly values the significant contributions of the Australian Retail Credit Association (ARCA) in developing industry-wide credit reporting rules and standards. ARCA's expertise and proactive approach have been instrumental in fostering a collaborative environment where industry stakeholders can work together to enhance the credit reporting framework. Their efforts have greatly contributed to the development and ongoing refinement of the Credit Reporting Code (CR Code), ensuring it remains relevant and effective in addressing industry needs.

ARCA's deep understanding of the credit reporting landscape, combined with their commitment to best practices, has enabled them to create standards that support transparency, accuracy, and

fairness in credit reporting. This work has undoubtedly improved the quality of credit information and facilitated better outcomes for both consumers and credit providers.

However, it is important to acknowledge that ARCA's operations are funded by its members, which include the major credit reporting bodies (CRBs). This funding structure necessitates a clear distinction between the CR Code and legislative requirements to avoid potential conflicts of interest.

#### **4 Part Four Questions: Impact of the credit reporting framework**

- 4.1 What has been the impact of Australia's concentrated credit reporting industry on the price of credit enquiries, reliability of service, and innovation?

We would not necessarily agree that the credit reporting industry is concentrated, or overly so, noting that Australia appears to have a similar number of agencies with other countries of similar market. That said, we note that the requirement to notify which CRB is engaged at the beginning of a credit contract allows little room for new market entrants without significant investment. We would suggest that this restriction should be reconsidered, with other effective methods of ensuring consumers are properly informed.

- 4.2 Does the current regulatory framework provide sufficient incentives for innovation and competition in the CRB industry, including new entrants?

While the current regulatory framework supports a stable credit reporting industry, it remains challenging for new entrants to gain a foothold without substantial cooperation from major data providers, such as the big banks. The reliance on data from these large financial institutions creates a significant barrier to entry, as new CRBs must secure agreements with these banks to access enough information to provide a viable product. This dependency makes it difficult for new players to compete with established CRBs, which already have extensive data sharing arrangements in place.

- 4.3 Should CRBs be required to share some or all of their data sets with the other CRBs to promote competition?

We consider that all bureaus should have access to the same credit reporting data. This would improve competition in the sector by reducing barriers to entry for new market participants, and would drive innovation and reduce costs, as bureaus would be driven to compete on price, service and their own unique value propositions, such as superior analytics capabilities. We consider there are presently significant barriers for new entrants, as large established incumbents enjoy the information advantage and market share from having been longer established.

We note that one practical barrier to entities furnishing data across multiple bureaus is the project work required to integrate with each bureau. In the United States of America, the Consumer Data Industry Association has developed the Metro 2 Code®, a universal data format used by all bureaus for financial service providers to report data. The creation of a similar universal data format may encourage financial service providers to report across multiple bureaus, improving competition.

#### **5 Part Five Questions: Credit data**

- 5.1 What other types of credit-related information should be reported, or excluded, as part of Australia's credit reporting framework?

Information provided by credit reporting bureaus can help lenders to efficiently contact defaulting customers supporting proactive hardship assistance. Early resolution of arrears helps consumers avoid escalating debts. Bureau data also helps lenders and collectors to reduce the costs of managing delinquency, ultimately reducing the cost of credit.

The credit reporting framework was last reviewed fifteen years ago. Since that time, technology has evolved, changing the way consumers engage with credit providers. Customers prefer contact via low touch digital channels which support real time response. As outlined in the ACDBA data survey<sup>3</sup>, 66.4% of all customer contact is the collections industry is by way of digital communication channels. In the most recent data survey, digital communication volumes were 12 times that of traditional mail.

The data contained on credit files is out of step with consumer contact channel preferences. While bureau data currently contains physical addresses, it does not support communication via preferred digital channels. Credit file data should be modernised to reflect these preferred contact channels, including providing (for instance):

- email addresses;
- telephone numbers; and
- social media contacts.

Such information may also assist lenders and consumers, by allowing for improved fraud mitigation strategies. For example, lenders, or bureau servicing lenders, would be able to develop algorithms that have regard to how long a digital channel has been associated with the customer's credit file, and use such data to risk score the digital engagement to mitigate identity theft and fraud.

5.2 Are the definitions of the different types of credit information detailed in Part II of the Privacy Act fit for purpose?

We believe that the credit reporting system would benefit greatly from the valuable Consumer Credit Liability Information of debt purchase industry participants. Such information is likely to assist prospective lenders to avoid entering into unsuitable credit contracts by allowing lenders to make a better assessment of the consumer's overall liabilities.

We understand that under the Privacy Act 1988 (Cth)<sup>4</sup>, Consumer Credit Liability Information may only be retained by the credit reporting bureaus for a maximum of 2 years from the date that consumer credit is terminated or otherwise ceases to be in force.

While debts assigned to debt purchasers remain due and valid obligations of the debtor, the wording at s20W of the Act, together with definition of 'the day on which consumer credit is terminated or

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<sup>3</sup> [www.acdba.com/images/acdba/submissions/ACDBA\\_Data\\_Snapshot\\_FY2022.pdf](http://www.acdba.com/images/acdba/submissions/ACDBA_Data_Snapshot_FY2022.pdf)

<sup>4</sup> Pursuant to s20W

otherwise ceases to be in force<sup>5</sup>, under the Privacy (Credit Reporting Code) effectively precludes debt purchase accounts, where they were charged off by the original financial service provider, from being reported by the debt purchaser as CCLI information.

We have been unable to identify any public policy reason for the exclusions of CCLI data by debt purchasers. The position appears to be inadvertent, caused by a failure to consider the debt purchase industry, and the circumstances of the continuing liability, when the Act and Code were drafted.

#### 5.3 How can the current retention period arrangements be improved?

The current retention period arrangements for credit information could be improved by standardising the retention periods across all Credit Reporting Bodies (CRBs) to ensure consistency and fairness in the credit reporting system, by ensuring that a default listed on one CRB, but is not, by virtue of process and/or practicality, listed on another CRB until later. One practical improvement would be to allow for the mirroring of dates between CRBs. This would ensure that credit information is retained and updated uniformly, preventing discrepancies that could impact consumers' creditworthiness assessments.

#### 5.4 Should limitations be placed on listing of defaults long after the debt was due?

No, limitations should not be placed on the listing of defaults long after the debt was due. The current process followed by members ensures that all possible avenues are exhausted before considering default listing.

This includes utilising hardship moratoriums and working closely with customers on flexible arrangements, sometimes for months or even years, to help them navigate their financial challenges.

Collection agents use the available time to be as flexible as possible, only resorting to default listings when the customer disengages from the process. Moreover, when debts are transferred to collection agents, there can be significant periods of no engagement due to outdated contact information. Imposing a time limit on the listing of defaults would likely lead to collection companies prematurely listing defaults to comply with the time constraints. This would reduce the flexibility currently offered to customers during difficult times or prolonged periods of no contact.

While the detail around this would be of crucial importance, guidance could be provided to the industry on when it may be deemed unreasonably close to the relevant statute of limitations, however we would counsel that the complexity of calculating such a date can be a difficult movable feast, with the statute being a considerable legal determination.

Maintaining the current approach allows collection agents to provide the necessary support and flexibility to customers facing financial difficulties, ensuring defaults are only listed as a last resort when all efforts to engage the customer have been exhausted.

## 6 Part Six Questions: Consumer protection and awareness

#### 6.1 Can the following arrangements be improved to better protect consumers at reasonable cost:

- correcting a credit report

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<sup>5</sup> This has regard to the day that the provider charges off the full balance of the credit after deciding that the outstanding balance is a loss due to the likelihood that the amount may not be recoverable, although the provider maintains the legal ability to take enforcement action in respect to any outstanding debt owed by the individual under the credit.



We note that generally only one of the CRBs charge fees for correcting of a credit report, those costs ranging up to several hundred dollars per correction. Whilst we can understand there may be a business cost of such a process, it is noted that there could be cost barriers for the correcting of credit reports, which could result in a dissuasion from involvement with the process, or inconsistent and/or incorrect data. We further note that it appears contradictory to the CRBs own obligation, to dissuade amendments and updates. We would strongly recommend that amendments of data should not be met with cost barriers.

- protections for victims of financial abuse and family violence?

The credit reporting framework primarily focuses on ensuring the accuracy, integrity, and fairness of credit information. While it plays a crucial role in consumer protection, addressing the complex and sensitive issue of protections for victims of financial abuse and family violence extends beyond the scope of the credit reporting framework alone. We note recent additions have been made to the Code which appear to provide greater ability for consumers to raise such issues as grounds for potential correction or removal of default information<sup>6</sup>.

Any protections require a coordinated approach involving multiple sectors, including legal, social services, and financial institutions, to provide comprehensive support to affected individuals. While the credit reporting framework can contribute by ensuring that victims are not unfairly penalised on their credit reports, broader systemic solutions are needed to effectively protect and assist these individuals.

#### 6.2 Should additional consumer protections or other regulatory provisions be applied to credit repair services?

We are seriously concerned by the rise of credit repair services (CRS) It is notable that our members have a significant level of interaction with this sub-sector and grow weary of reports from consumers who report unreasonable promises made by CRS firms to clear all debts off of a credit file, and in most cases, they are encouraged not to pay any underlying outstanding debts. Members report that up to 74% of complaints received relating to credit reporting, are received via a CRS firm.

In our experience, CRS firms generally try to honour their claims via issuing a number of templated emails to any CP noted on the report. These templates are usually unlikely to be understood, containing numerous contradicting and extremely technical arguments, are rarely tailored to the consumer's situation, and most importantly usually carry a request that should the default not be removed a voluminous and oppressive number of documents are sought, along with a matter-of-fact statement that the matter will be complained of to the highest authority possible.

It is certainly true that any inaccurate information held on a credit report should be quickly corrected, however in our experience the practice of most CRS firms is to resist any suggestion the information is correct, and raise escalating complaints until their desired goal is achieved. Due to the practice of many CRS firms, the ACDBA has regularly heard suggestions from various CPs that they will routinely remove a correct default to avoid the burden of continuing to defend it.

The ACDBA strongly support significant regulations and consumer protections being applied to CRS firms and their activities.

#### 6.3 Is the credit reporting corrections process leading to adverse implications for the credit reporting framework (e.g. data reliability)?

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<sup>6</sup> ARCA CR Code Variation November 2023

Yes, as discussed above the ACDBA receives regular reports from consumers, members, and third parties, that there is a practice by some CPs to avoid complaints via removal of defaults that otherwise would have been otherwise retained.

We propose that to ensure data accuracy, if the industry is to continue to function as it should, some type of flag should be created to ensure that others who access the credit data within the relevant period are aware of the assistance of a CRS. This would allow CPs to make an informed decision via discussion with their consumer rather than relying on possibly inaccurate information.

## **7 Part Seven Questions – Access to and use of credit reports**

7.1 Should credit reports be able to be used for other purposes beyond a 'credit purpose'?

We would note there appear to be strong arguments either way. On the basis of the purpose discussed in the paper, being to limit the need for further information sharing, we submit there is a persuasive argument in favour of such expansion, however note that significant changes would likely be required to accommodate such a change.

7.2 Should non-financial participants such as telecommunications and utility providers be able to contribute repayment history and other positive reporting data?

We encourage such an approach for the purposes of consistency. It is notable that many of these firms already have the ability to report negative information, and further data can only lead to more accurate results.

7.3 How is the consumer framework used to support business or commercial considerations and is this appropriate?

The consumer framework for credit reporting is designed primarily to protect individual consumers by ensuring accurate and fair credit reporting. However, it can also support business and commercial considerations by providing reliable credit information that businesses use to make informed lending decisions. This dual use is appropriate as it maintains the balance between protecting consumers and supporting the credit industry's need for accurate data to assess creditworthiness. Ensuring transparency, accuracy, and consistency in credit reporting benefits both consumers and businesses, fostering trust and efficiency in the financial system.

7.4 Should Australians be able to permit foreign credit providers and CRBs to access their Australian credit reports? If so, how should this arrangement work?

Yes. Australians should always have the option to provide their data to whomever they choose. It is notable that migrants to and from Australia may have significant difficulty becoming financially established without the benefit of such data.

7.5 Should foreign credit information from foreign credit providers be able to be included in an Australian credit report?

Yes. For the same reasons as above, it is difficult to understand why in such a global economy, it would not be encouraged that consumers may engage with CRBs and CPs from different countries.

## **8 Part Eight Questions: Privacy, information security and regulatory oversight**

8.1 What improvements can be made to the privacy and security of all information in the credit reporting framework?

We would submit that the privacy and security of credit reporting is already well handled, and are unaware of any concerns.

8.2 Should CRBs and entities accessing credit reports be subject to more explicit information security requirements and oversight?

We are unaware of any example of the current security and oversight being deficient.

8.3 Should CRBs be required to register or obtain a licence?

We do not believe that it would be beneficial to the credit reporting framework or market to encourage such an exercise. That said, we would support a publicly available list of currently identified CRBs being maintained, and have noted some limited consumer confusion about who is a CRB and some third party providers who supply CRB data.

8.4 Are there any other categories of activities that should be exempted from the definition of CRB?

The existing exemptions within the definition of a Credit Reporting Body (CRB) appear to be comprehensive and appropriate for ensuring that entities primarily involved in credit reporting are effectively regulated. It is important to maintain clarity and consistency in the definition to avoid regulatory gaps. Therefore, no additional categories of activities should be exempted from the definition of CRB, as this could undermine the integrity and effectiveness of the credit reporting framework. Maintaining the current scope ensures that all relevant activities are adequately covered and regulated

## **9 Part Nine Questions: Mandatory credit reporting**

Has mandatory comprehensive credit reporting increased the voluntary participation of credit providers and the voluntary supply of credit information in the credit reporting system?

We submit that mandatory participation by large ADIs has met its objectives, with the CCR framework now having achieved critical mass.

According to reports on the CreditSmart website, 95 percent of consumer credit accounts now have repayment history being reported across Australia<sup>7</sup>. Further, as of the end of June 2023, more than 80 credit providers in Australia were supplying CCR data. These figures demonstrate that the mandatory participation by large ADIs has successfully increased the availability and comprehensiveness of credit information.

The increased reporting has improved lending decisions by providing a fuller picture of a consumer's creditworthiness, leading to more accurate risk assessments and better outcomes for both consumers and lenders. Additionally, this broader data sharing has enhanced financial inclusion by allowing more consumers to access credit based on a comprehensive view of their credit history.

9.1 What have been the costs to implement mandatory credit reporting?

We are unable to discuss the costs of same, not having undertaken such a process ourselves, however members report that the significant costs and technical complexities required to achieve CCR compliance would add a significant overhead for existing market participants and create greater barriers to entry for new participants, ultimately reducing competition.

9.2 Should the scope of mandatory credit reporting be expanded to include other credit providers or other types of information, and if so, how should this be done?

ACDBA strongly opposes any further expansion of mandatory participation in comprehensive credit

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<sup>7</sup> [CreditSmart website, 'Comprehensive credit reporting participants'](#)

reporting ('CCR').

There are significant barriers to participating in CCR, including the costs involved and ensuring that the right technology is in place to facilitate the reporting. The significant costs and technical complexities required to achieve CCR compliance would add a significant overhead for existing market participants and create greater barriers to entry for new participants, ultimately reducing competition. This is true both of our sector and the lending sector.

There should be no further expansion of mandatory CCR beyond those large ADIs already required to participate. CCR should prevail as the favoured model, not because of any mandatory obligation to participate, but because it adds value to participants and the benefits outweigh the costs. Encouraging voluntary participation by demonstrating the value of CCR, rather than imposing further mandatory requirements, will ensure a more balanced and competitive market that fosters innovation and growth.

## Conclusion

The Australian Collectors & Debt Buyers Association (ACDBA) believes that while the current credit reporting framework has been effective in many respects, there are several critical areas where improvements are necessary. A simplified and more transparent legislative framework is essential to ensure that all participants interact with the system in a fair, considered, and transparent manner. This involves reducing reliance on paper communication, integrating digital channels, and standardising data formats to streamline the reporting process.

Additionally, it is imperative to include the possibility of Consumer Credit Liability Information (CCLI) from debt purchase industry participants within the credit reporting system. This inclusion will provide a more comprehensive view of a consumer's liabilities, enabling better credit assessments and helping lenders make more informed decisions. This adjustment will address a significant gap in the current framework and enhance the accuracy and usefulness of credit reports.

Furthermore, addressing the detrimental impact of for-profit credit repair agencies is crucial. These organisations often exploit existing systems to the disadvantage of both credit providers and consumers. Establishing a dedicated credit listing review service under the Office of the Information Commissioner can ensure that complaints are handled fairly, efficiently, and cost-effectively. This approach will mitigate the misuse of the Australian Financial Complaints Authority (AFCA) fee structure and reduce the undue leverage enjoyed by credit repair firms.

The ACDBA remains committed to working with regulators, industry stakeholders, and consumers to enhance the credit reporting framework, ensuring it remains robust, fair, and capable of meeting the evolving needs of the financial landscape. Thank you for the opportunity to contribute to this important review. We are available to discuss any aspect of this submission further.

## Contact

For any enquiry in relation to this Submission, please contact:

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## Appendix 1

### Members of Australian Collectors & Debt Buyers Association

- Axxess Recoveries & Collections Pty Ltd
- CCC Financial Solutions Pty Ltd
- Charter Mercantile Pty Ltd
- CollectAU Pty Ltd
- Complete Credit Solutions Pty Ltd
- Credit Corp Group Limited (ASX: CCP)
- Lyndon Peak Pty Ltd t/as Access Mercantile Services
- PF Australia Pty Ltd
- PRA Australia Pty Ltd
- Recoveries Corporation Holdings Pty Ltd
- Standard8 Advisory Pty Ltd
- Strategic Collections Pty Ltd

### Affiliate Members of Australian Collectors & Debt Buyers Association

- Acceleon Pty Ltd
- CreditSoft Solutions Pty Ltd
- Experian Australia Pty Ltd
- TaleFin Australia Pty Ltd
- TCN