



**Credit Repair Industry Association of Australasia**

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Dear ARCA members,

Thank you for providing the Credit Repair Industry Association of Australasia (CRIA) with the opportunity to comment on the Draft Credit Reporting Code of Conduct (CR Code).

The CRIA is a newly formed industry body for credit repairers, and other related stakeholders in the credit industry. Credit Repairers act on behalf of individuals in requesting corrections for inconsistencies on their credit reports, particularly where those inconsistencies impact on the individual's ability to obtain credit.

As credit repairers act directly for individuals in matters of credit reporting accuracy, the CRIA aims to have an influence on decisions of credit reporting law as they impact individuals.

Therefore a consumer---based viewpoint was the perspective the CRIA took when investigating the potential benefits and problems in the draft CR Code.

The CRIA has found the CR Code to be a significant and important document in ensuring credit reporting accuracy, new obligations for Credit Providers and Credit Reporting Bureau's and the rights of individuals in the credit arena moving toward the March 2014 deadline of implementation of the *Privacy Act 1988 (Cth)* amendments.

We have identified some key areas of noteworthiness within the Draft CR Code as well as some areas where alterations could better improve protection for consumers. These areas include:

1. Clarification of the importance of the relationship between time and amount when CP's are considering pre---conditions to a default listing, and also considering the new format of electronic bills.
2. Giving individuals as full and complete a picture of their credit worthiness via the CRB as possible and how to best do that.
3. The encouragement of easier access to the free credit report for individuals.
4. The benefits of auditing the credit reporting practices of CP's.
5. The benefit of establishing an external regulator to oversee the new role CRB's will play as monitors of accurate credit reporting.
6. Other suggestions as to re---wording of legislation to give extra protection to consumers – namely  
in:Section 4 (Information Collection Procedures),  
Section 5 (Types of Credit Information),  
Section 9 (Default Information),  
Section 10 (Payment Information),  
Section 12 (Publicly Available Information) and  
Section 20 (Access)

In reviewing the Draft Credit Reporting Code of Conduct, in general the Credit Repair Industry of Australasia (CRIA) has felt positively about the Code's direction, as being focused on filling in gaps that the previous legislation failed to address where those gaps impacted on individuals and their rights pertaining to their credit information.

We believe this legislation will make it easier for individuals, and those whom act on their behalf to dispute credit listings which they believe are inconsistent, inaccurate or unfair. The importance of having a credit reporting system which is capable of easily making adjustments in credit reporting where necessary cannot be overstated. Likewise, having a system which is both accountable to a governing body and transparent is also of great importance moving forward with the new data sets of information available to lenders.

Below are issues we have identified may have an impact on individuals.

## Key Issues

When asked to provide a submission to ARCA on the CR Code, it was requested that stakeholders give some thought to some identified key issues which have arisen during the drafting and testing of the CR Code.

The CRIAIA has reflected on the identified key issues, as outlined below:

### **1. Ability for Credit Providers to report through a unique identifier**

*To enable a Credit Reporting Body to ensure that its database identifies all of the information provided to it about an individual's credit accounts and that further information in relation to a previously reported credit account is recognised as an update, Credit Reporting Bodies would like Credit Providers to give each credit account a unique identifier (eg the account number allocated to the customer) and use this when reporting information to the Credit Reporting Body.*

The CRIAIA believes that a unique identifier would benefit the credit industry by streamlining the process of adding accurate information to Australian credit reports. It would reduce the instances of issuing and updating information on the wrong account – which can occur from time to time.

### **2. Categories of credit information**

*As expected by the Explanatory Memorandum, the CR Code includes obligations that effectively explain what is meant by some categories of credit information. In particular, complex issues arise in relation to "consumer credit liability information" given the range of types of credit that the industry provides to individuals. Whilst ARCA working groups have been discussing, for example, how to determine when credit is "closed or terminated", it may be that there are practical issues that the current wording in the draft CR Code does not sufficiently address.*

The CRIAIA has not identified any practical issues surrounding the current wording in this regard.

### **3. Preconditions to a default listing**

*As expected by the Explanatory Memorandum, the CR Code sets out procedures for default listings. These have been framed in light of the significantly different wording used in new Section 6Q of the amended Privacy Act as compared with Section 18E(1)(b)(vi) of the pre-amendment Privacy Act.*

*The proposed new provisions enable the default amount that is listed to be the amount that is owing as at the date of default listing (rather than the amount that was owed at the time*

*of demand for payment). This is considered to be less confusing for individuals and ensures that default listings are accurate and up---to---date at the time of listing.*

The CRIAA agrees that the previous wording of Section 18E1)(b)(vi) of the pre---amendment Privacy Act may have been confusing for consumers – but argues that this amendment would not be the recommended solution to answer this confusion.

We understand that amounts owing change from the time of notice to the time of the default listing but it is important for CP's to provide accurate information to the individual.

A solution may be that the CP could be required to stipulate in their Notice the:

-- date of the intended default listing and;

-- the final amount the CP calculates will be owing by that date (and which will be listed on their credit file).

The CP will then be satisfying its obligations of accurate notification.

Furthermore, in regard to a CP's notice obligation as specified in Part IIIA, in order to satisfy the intention for the CP to take 'reasonable steps' to notify the individual that they are in arrears -- when a CP sends out a Default Notice to an individual who has previously only requested email statements, it should be a requirement that the notice be sent by email as well as by mail.

Otherwise those individuals who receive electronic statements, whom are growing in numbers daily, have the opportunity to be unfairly defaulted if they have moved when they don't update their address with the Creditor because they receive electronic statements.

#### ***4. Refusal of credit – disclosure in notification letter***

*As expected by Part IIIA of the Privacy Act, the CR Code sets out obligations that apply where an individual's credit application is refused. Preliminary discussions with industry and consumer advocates alike suggest there is merit in a credit refusal letter containing pro---forma information about credit reporting, rather than attempting to specify the particular factors that led to credit being refused to an individual. Accordingly the draft CR Code takes this approach.*

The CRIAA takes the stance that wherever possible and practicable, information to consumers about their credit file should be as full and specific to them as possible, to allow for ease of understanding and correction of issues which arise. However in this instance if the information is easily referenced from the individual's credit file to the accompanying explanatory documentation the individual could ascertain for themselves the specific factors which led to credit refusal and in addition allow greater education on the wider issues impacting on credit suitability.

##### **5. Access to a free credit report from a Credit Reporting Body**

*Building upon the current approach in the Credit Reporting Code of Conduct, the CR Code requires a free credit report to be provided to an individual whose credit application has been refused after the Credit Provider obtained a credit report about the individual. A free credit report must also be provided where a Credit Reporting Body or Credit Provider has agreed to a correction request – so that the individual can check that the correction has been made appropriately. In addition, Privacy Act Part IIIA provides an individual with an entitlement to a free credit report once every 12 months.*

*In testing possible approaches, there has been discussion about how these entitlements to a free credit report bear upon the current practice whereby Credit Reporting Bodies also have a channel whereby an individual may pay for their credit report. The CR Code as currently drafted acknowledges this practice, but aims to ensure that the for---free channel is as visible and able to be as easily accessed as the for---fee service.*

The CRIAA emphasises the importance of easy access to free credit reports for consumers as per their rights in Part IIIA of the *Privacy Act 1988 (Cth)*.

A CRB webpage titled 'information collection procedures' or similar would not suffice to uphold this right.

We believe CRB'S should be required to advise individuals about their right to obtain a free credit report when they enquire about obtaining their credit report -- via both telephone and internet methods.

A paid credit report should be available to individuals who do not qualify for a free credit report, or for individuals who need to obtain a copy of their credit report for urgent reasons.

In answer to the second part (below) of the question on an individual's access to their credit report:

*Preliminary discussions to date have also canvassed how a credit report can best help an individual to understand the derived information (credit score) that needs to be disclosed in a for---free credit report. The CR Privacy Code includes some wording to address this issue, but also provides protection for the confidentiality of the methodology, data analysis methods, computer programs or other information that is used to produce derived information. (Similar protection is provided where a Credit Provider provides access to its derived data.)*

The CRIAA is of the opinion that information on how individuals can understand their credit score is essential going forward. This information would decrease the likelihood that an individual is impacted by preventable credit decisions and encourage them to make positive credit decisions.

For instance, if individuals understand more about how the number of credit enquiries may impact their credit application, they may take steps to prevent this by reducing the number of credit applications they make in the future.

A requirement for CRB's to provide general information with an individual's credit report on factors possibly impacting on their credit---worthiness would suffice.

#### **6. Credit Reporting Body database environment**

*The CR Privacy Code recognises that corrections practices need to take account of Credit Reporting Bodies' database environment and that whilst active information needs to be corrected (ie. the information that will be used for future credit reports) historical information should not be corrected.*

The CRIAA agrees the volume of information currently held would not warrant the correction of historical information.

#### **7. Credit Reporting Body membership of a recognised external dispute resolution scheme**

*The CR Code includes an obligation that a Credit Reporting Body must be a member of a recognised external dispute resolution scheme. Presently some Credit Reporting Bodies are members of such a scheme, but others are not and no mandated obligation of membership applies. In consultation discussions, the OAIC indicated that they believe Credit Reporting Bodies should be members of EDR schemes.*

The CRIAA supports all avenues of dispute including External Dispute Resolution Schemes. Although currently available for some CRB's, complaints about them are generally referred to the OAIC, of which there can be a significant waiting time due to the backlog of Privacy complaints to the Privacy Commissioner.

The CRIAA would encourage a separate EDR scheme for CRB's which would reduce waiting times for consumers who wish to pursue a complaint against a CRB, particularly when that complaint is related to an individual's inability to obtain credit.

#### **8. Credit Provider membership of a recognised external dispute resolution scheme**

*The Privacy Act could be construed as requiring a Credit Provider to be a member of a recognised external dispute resolution scheme in order to be able to request a credit report from a Credit Reporting Body. This is because such a request is "credit information" under the Privacy Act and the Act only permits a Credit Provider to contribute credit information if a recognised EDR scheme member. This has the result that some commercial lenders who are not otherwise required to be a member of an EDR scheme will have to join an EDR scheme. But some Credit Providers (suppliers of goods and services for credit in industries other than Finance, Telecommunications, Energy and Water) will not have access to a scheme because there isn't currently a scheme that they are eligible to join. The draft CR Privacy Code addresses this so as not to deny them access to credit reports.*

Currently Credit Providers (CP's) are not bound to be members of an EDR, and this has significant ramifications for individuals seeking correction of their credit report, or making complaint about their CP.

The CRIA agrees with the OAIC in seeing a clear and urgent need to have mandatory EDR schemes for CP's in place.

#### **9. Auditing of credit providers by CRBs**

*As expected by the Explanatory Memorandum, the CR Code provides further detail as to Credit Reporting Bodies' oversight obligations in relation to Credit Providers. Consistent with generally accepted oversight methodologies, the CR Code requires Credit Reporting Bodies to take a risk---based approach and to monitor Credit Providers using their considerable data and experience with Credit Providers. The aim should be to determine the Credit Providers that pose the greatest risk in terms of likelihood and impact of non---compliance with the core obligations under Part IIIA of the Privacy Act. These Credit Providers should most frequently be subject to audits, with the scope and depth of the audit tailored in accordance with the risk assessment. To ensure the rigour of audits, the draft CR Privacy Code includes requirements as to auditor independence and expertise.*

*In stakeholder discussions to date, there has been general agreement about the merits of a risk---based approach. Consumer advocates are, however, concerned that there should be transparency and regulator oversight to ensure the quality of the risk monitoring and auditing. Industry have expressed concern about consistency as between Credit Reporting Bodies, costs and efficiency issues where Credit Providers have relationships with more than one Credit Reporting Body. Feedback would be helpful as to whether the current approach deals appropriately with these concerns.*

Auditing of CP's will close a very significant gap which is currently wide open in credit reporting. Accountability for the integrity of credit information is paramount, particularly when introducing new data sets of credit information. The CRIA sees this as possibly the most significant positive change in Australian credit reporting law resulting from the *Privacy Act 1988 (Cth)* amendments, and it is vital that careful consideration is given as to how the auditing will be performed as accurately, fairly and transparently as possible.

The expectations on CRBs as per the new CR Code, and confirmed by the Privacy Commissioner, are that they will take on this role:

*Credit reporting bodies are expected to fulfil a 'second line' compliance monitoring role – with responsibility to sign credit providers up to agreements that oblige them to comply with the Part IIIA of the Privacy Act and the CR Code, power to ask credit providers to review their practices, procedures and systems where problems have emerged and with monitoring and auditing responsibilities.*

However the CRIA wishes to make note that the level of accountability required by CRB's on the performance of CP's would in our view require a significant shift in mindset by CRB's.



For example, currently, one particular CRB has what has been described as a 'good faith policy' when it comes to CP's satisfying their legal requirements as set out in the current CR Code and Privacy Act 1988 (Cth) and underpinned in the CRB's terms and conditions.

This has meant in some cases the CRB does not require written proof of the appropriate documentation that was provided to the individual, but operates more on the verbal and or written authority of the CP that the CP has in fact met the CRB's requirements when adding a credit listing into the CRB's databases.

This has in the past become a stumbling block for credit repairers who are acting on behalf of individuals who are disputing the validity of their credit listing and the circumstances surrounding its reporting on the individual's credit file. Particularly where the case involves the individual's inability to obtain credit due to the disputed credit listing.

For reasons like these it would be pertinent to appoint an independent overseer to ensure CRB's meet their new obligations as auditors of CP's and appropriately make the necessary shift to compliance monitors as well as pure credit reporting agencies.

#### **10. Reporting by CRBs publicly and to Information Commissioner**

*Consistent with the current Credit Reporting Code of Conduct and with new section 26N(3)(c) of the Privacy Act, the CR Code specifies reporting that must be provided to the Commissioner. The OAIC has confirmed that this is their expectation, and have provided some guidance as to their reporting priorities. They would also like Credit Reporting Bodies to be regularly reviewed by an independent reviewer.*

*In preliminary consultations to date, consumer advocates have also expressed an expectation that Credit Reporting Bodies will publicly provide reporting as to their activities. The extent of reporting does, however, need to be practical and not impose undue costs on the credit reporting system. Feedback as to whether the draft CR Privacy Code strikes an appropriate balance would be of assistance.*

*The draft Guidelines suggest, and the Privacy Commissioner has confirmed to ARCA, that these expectations apply to the CR Code (as much as to voluntary APP codes).*

*"[G]iven the importance of the CR code to the credit reporting regime, and the sensitivity of credit reporting information, the Commissioner would expect the CR code to be accompanied by clearly articulated governance arrangements regarding the on---going administration of the code. Further, where mechanisms such as code development or administrative committees are used, the Commissioner would generally expect them to be broadly representative of the entities that will be bound by the code and be transparent in their operations."*

*The draft CR Code has been developed to date assuming the following governance structure:*



.. *Credit providers are expected to provide a 'first line' of compliance – responsible for establishing compliant practices, procedures and systems and training their people in these.*

.. *Credit reporting bodies are expected to fulfil a 'second line' compliance monitoring role – with responsibility to sign credit providers up to agreements that oblige them to comply with the Part IIIA of the Privacy Act and the CR Code, power to ask credit providers to review their practices, procedures and systems where problems have emerged and with monitoring and auditing responsibilities.*

.. *The Commissioner provides the 'third line' of oversight, receiving regular reporting from credit reporting bodies and regular independent review reports as to credit reporting bodies' compliance with their Part IIIA of the Privacy Act and CR Code obligations. The Commissioner is also responsible for arranging regular reviews of the CR Code.*

The CRIAA believes there could in some circumstances be a conflict of interest in the current proposed structure of CRB's overseeing CP processes and complaints. For these reasons there should be regular independent reviews of the effectiveness of CRB's providing the monitoring role of CP's expected of them within the CR Code. This independent review should be made directly to the Privacy Commissioner.

We believe the CR Code effectively outlines the obligations of both CP's and CRB's in credit reporting – and an administrative body should have the responsibility of ensuring these obligations are met as well as to investigate repeated complaints made and consult directly with the Privacy Commissioner.

In addition to the key issues identified by ARCA and stakeholders, the CRIAA identified some other areas of concern within the proposed CR Code:

## **Information Collection Procedures.**

The proposed legislation reads as follows:

### **4. Information Collection Procedures**

*Part IIIA obliges Credit Provider's (CP's) to notify or ensure individuals are aware at or before the time of collection of personal information the CP is likely to disclose to a CRB:*

*(a) Of the Credit Reporting Bureau (CRB) with which the CP deals; and*

*(b) Other matters required by the CR Code*

The CRIAA has identified that CP's should be further required to notify individuals at the point of sale/contract that their information could be likely disclosed to a CRB. The CP should also be able to provide notation of the form of disclosure verbal/non-verbal and appropriate dates.

Furthermore in the following piece of the CR Code we have identified some areas of concern:

*4.2 A CP may comply with the obligations in Section 21C(1)(a) and paragraph 4.1 of this CR Code to notify or make an individual aware of specified matters (the “notifiable matters”) by:*

*(a) publishing a clearly expressed statement of the notifiable matters on its website; and*

*(b) at or before the time of collection of the personal information from the individual notify the individual:*

*(i) that the CP’s website includes information about credit reporting including the CRBs to which the CP is likely to disclose the individual’s credit information; and*

*(ii) how to access that information on the CP’s website.*

4.2 (b) (i and ii) allows the credit provider to have a generic statement contained on its website to notify an individual that the credit provider is likely to disclose information to a credit reporting agency.

The main concerns surrounding this matter are that large credit providers do not have ready access to archived changes of their websites. This being the case, if a dispute arose from an application that was made three years ago, the credit provider may have difficulty proving:

1) the contents of the statement on the website at the time of the individuals application

2) if the page that contained the information was actually operable at the time of application

Furthermore, the larger CPs’ websites contain many pages and make it often difficult to locate important information. This section has the result of "ticking the compliance box" rather than pro---actively notifying an individual applicant of what the credit provider wishes to disclose and when. It would be preferable that the individual is required to give consent for their personal information to be given to third party credit reporting agency.

## **Types of Credit Information**

The CRIA recommends extra requirements be made on CP’s within section 5.2 which deals with practices, procedures and systems. The current draft CR Code reads:

*5.2 A CP must have reasonable practices, procedures and systems, given the size and complexity of its business, in place that are designed to:*

*(a) ensure that it does not disclose information to a CRB that it is prohibited by Part IIIA or this CR Code from disclosing;*

*(b) promptly advise the relevant CRB if the CP becomes aware that it has disclosed information to the CRB that it is prohibited from disclosing by Part IIIA or this CR Code;*

*(c) ensure the data integrity of disclosed credit information;*

*(d) if it identifies data integrity issues in credit information that it has disclosed to a CRB:*

*(i) promptly advise the CRB of those issues; and*

*(ii) take reasonable steps to rectify those issues;*

*(e) promptly advise the relevant CRB if the CP becomes aware of data integrity issues in credit reporting information disclosed to it by the CRB*

*(f) where requested by a CRB:*

*(i) review its credit reporting data management practices, procedures and systems, to the extent reasonable, to assess the data integrity of credit information it has disclosed to CRBs;*

*(ii) take reasonable steps to rectify any data integrity issues that are identified; and*

*(iii) advise the CRB of the results of the review and action taken to rectify data integrity issues; and*

*(g) otherwise provide reasonable assistance to CRBs to maintain data integrity in relation to credit reporting information and to rectify any issues that are detected.*

It would be pertinent to add if the CRB identifies data integrity issues in credit information that it has disclosed to a CRB that in addition to the other steps it would be required to make, it may be required to take reasonable steps to delete the credit information.

Here is suggested rewording of 5.2:

5.2 A CP must have reasonable practices, procedures and systems, given the size and complexity of its business, in place that are designed to:

*(d) identify data integrity issues in credit information that it has disclosed to a CRB, and where such issues are identified:*

*(i) promptly advise the CRB of those issues; and*

*(ii) take reasonable steps to delete the listing;*

## **Default Information**

The CRIA has identified some areas worthy of investigation in Section 9 of the draft CR Code:

### **9. Default Information**

*9.1 A CP must not disclose a consumer credit overdue payment to a CRB as default information:*

*(a) if the individual has requested new payment terms (whether via a variation of the terms and conditions of the consumer credit or new consumer credit);*

*(b) if the individual has not made a request during the previous 4 months for new payment terms that the CP reasonably believes had bases that were materially the same as those on which the current request was made; and*

*(c) either:*

*(i) whilst the CP is in the process of deciding the individual's eligibility for new payment terms, including if the CP is waiting upon information from the individual for the purposes of so deciding this; or*

*(ii) if the CP decides to refuse to provide new payment terms to the individual – until at least 14 days after the CP has notified the individual of this decision.*

We suggest that a third stipulation be made that the CP must not disclose a consumer credit overdue payment to a CRB as default information if the individual has previously made a written or verbal complaint to the CP to dispute the overdue account.

In cases where an individual disputes the account, the CP could delay listing a default until the dispute has been appropriately answered – this includes a written complaint made by the client, a third party or Ombudsman Service.

In addition, the CP should not be able to extend the statute of limitations by delaying listing a default listing for more than 12 months following the first Default Notice provided to the individual. In some cases, CP's have delayed a default listing for three years which effectively meant the statute of limitations expired while the "unpaid" default remained on the report for years after. As the statutes of limitations passes in some states the CP cannot accept payment, subsequently rendering it impossible for an individual to rectify the account and attempt to restore their credit history by paying the outstanding amount – unduly disadvantaging the individual.

## **Payment Information**

The CRIA has identified this section as being particularly noteworthy for its foresight:

### **10. Payment Information**

*10.2 Where a CP has an obligation under Section 21E to disclose to a CRB payment information relating to an individual and the individual asks the CP to disclose this information to the CRB urgently, the CP must disclose the payment information within 5 business days of the later of:*

*(a) the individual's request; and*

*(b) the date of the payment information as determined in accordance with paragraph 10.1,*

*unless the CP has reasonable grounds for requiring a longer period of time to do this.*

If anything, we believe this section could be expanded to include all payment update requests. In this day of fast moving technology, there should be no reason as to why all credit providers should not be required to update this information within 5 working days in every event.

We see continuous examples of where credit providers fail to update information in a timely manner and therefore negatively impact the consumer and cause considerable loss and damage.

## Publicly Available Information

### **12. Publicly available information**

*The information that Part IIIA permits CRBs, subject to conditions, to collect and disclose includes publicly available information (an undefined term in the Privacy Act).*

*Explanatory Memorandum p.124*

*12.1 A CRB must only collect publicly available information about an individual:*

*(a) from a government department or agency; and*

*(b) if the content of the information that is collected is generally available to members of the public (whether in the form provided to the CRB or another form and whether or not a fee must be paid to obtain that information).*

In this circumstance, we believe it also needs to be noted that a CRB must only collect information about an individual if the individual has been notified that their details will be collected by a CRB, as are the requirements for credit information.

## Access

Access to information in a timely fashion is crucial to individuals who wish to dispute their credit listing. We have identified a couple of areas within the below section of CR Code where there is opportunity for improvement:

### **20. Access**

*20.1 Where a person requests a CRB or CP to provide them with access to credit reporting information or credit eligibility information (as applicable), the CRB or CP (as applicable) must not provide access without first obtaining such evidence as is reasonable in the circumstances to satisfy itself as to the identity of the person making the request and that person's entitlement under Part IIIA to the access.*

Whilst the CRIA believes that the establishment of correct identity prior to release of information is paramount, it should not mean individuals are caught up with providing document after document if they choose to get assistance in disputing a credit listing.

Currently some individuals have experienced problems accessing their information via a third party (such as a credit repairer) in a timely fashion, because the CP requires the identity to be verified using an 'in-house' form, despite the appropriate information and authorisation being provided in a letter of authority provided by the third party. This causes unnecessary delays in disputing credit listings during often what is a time-sensitive occasion.

Also from the perspective of brokers – who submit credit applications to lenders on an individual's behalf, the inability to be provided with access and details of the credit file when a credit application is refused due to 'poor credit history' can lead to confusion for the individual, significant delay for the individual while they pursue their own credit report, and in some cases leads to breakdown of broker-client relationship.

If the individual gives written consent to a third party to have authority to access this personal information the third party should not be caught up in 'red tape' when this information is requested – from a CP or CRB.

The CRIA suggests that a generic letter of authority for release of information be devised by the appropriate authority to be used to help individuals who wish to access their information via a third party credit repairer, broker or by other legal means.

It should also be suggested as part of 20.1 that CP's cannot demand a client's current personal contact details to satisfy itself as to the identity of the person making the request as this information may not be relevant to the case of dispute.

If you require any further clarification of points raised within this submission by the CRIA, or have any further questions in relation to the position of credit repairers and their stakeholders within the framework of developing credit reporting law, please contact me.

Yours faithfully

Graham Doessel  
Spokesperson CRIA Board