**CR Code Review – CP survey questions**

***Historic CCLI datasets***

Background:

* While historic credit limits are currently held and used by some CRBs, there does not appear to be an ability for CPs to disclose/ correct these datasets, nor for consumers to fully access these datasets (although some consumer access via graphs may have been enabled in the past 2 years).
* In approaching this issue, ARCA’s starting position was to seek a legal view from the OAIC as to whether or not historic datasets were permitted to be held and disclosed as part of the credit reporting system. The OAIC concluded it was unable to reach a view and referred this issue to the CR Code review.
* The CR Code review provides an opportunity for industry to argue for/ against the inclusion of historic CCLI data as part of the credit reporting system.
* ARCA has assumed that CRBs would support inclusion of historic CCLI data – given additional datasets will improve the ability to risk profile an individual and support the overall richness of the credit reporting system data and operation.
* However, it is unclear whether CPs support inclusion of historic CCLI data. In particular, it is unclear the extent to which the operational requirements involved in implementation of these datasets weighs against the benefits of the inclusion of this information in the credit reporting system. That is, to what extent does historical data improve overall risk assessment and will be used by CPs? And what are the challenges of implementation?
* To enable an ARCA position to be put forward as part of the CR Code review, it would be useful to understand the extent to which CPs support inclusion of historic CCLI data.

**Question for CPs**

Which statement best reflects the position of your organisation:

1. Full support i.e. We support enabling historic CCLI datasets (more information allows for better risk profiling and implementation challenges should be addressed and overcome because benefits of this data outweigh these issues)
2. Qualified support i.e. We support enabling historic CCLI datasets but this is qualified by further consideration as to what information should be included and also implementation challenges (including whether it is possible to remove or opt to not report historic information if a CP cannot readily extract or correct that information).
3. No support i.e. We do not support enabling historic CCLI datasets (we do not see the value in this data, or even if we see the value of the data, we are not convinced that it outweighs the implementation challenges).
4. Other – please explain.

***RHI reporting***

Background:

* The CR Code review includes a question as to whether improvements could be made to how RHI is reported – with the example raised being monthly reporting (and issues with changes to the length of months which mean the ‘month’ for reporting does not always reflect the CR Code definition). This does raise a question as to whether ARCA puts forward a position for further improvements or enhancements to the RHI dataset.

**Question for CPs**

Which approach is most preferred by your organisation:

1. No change to the RHI wording in the CR Code (including no further change to ‘month’ definition)
2. Propose minor change to ‘month’ definition to address the technical issue of shorter months and recalculation of months, but no further changes
3. Propose (B) and, in addition, propose changes to RHI reporting to allow a CP greater flexibility in determining RHI – so that, for some accounts, RHI is determined based on days overdue, and for other accounts, RHI is determined based on the ‘month’ bucket.
4. Propose consideration be given to enabling further RHI datasets permitted by section 6V including (per s6V(1)(b) and (c)) \*the day on which the monthly payment is due and payable; and, \*if the individual makes the monthly payment after the day on which the payment is due and payable—the day on which the individual makes that payment.
5. Other – provide details