

2024 Independent Review of the PRDE RDEA's response to recommendations

The [Principles of Reciprocity and Data Exchange](#) (PRDE) are subject to independent review every 5 years (see Principle 6). The second independent review was conducted by Mr Phil Khoury of cameron. ralph. khoury in 2024, with the [final report](#) published December 2024.

The report made 12 overall recommendations; most of which relate directly to the structure and operation of the PRDE. In addition, there were some broader recommendations relating to actions that industry could take to improve the credit reporting industry and strengthen its social licence to operate.

The RDEA considers that the recommendations in the report are sound and would help improve the operation of the PRDE and improve the credit reporting system.

Subject to the following comments, the RDEA supports each of the recommendations.

General comments:

- Many of the recommendations are broad and provide significant flexibility on how they are implemented.
- The RDEA will take a two-step approach to implementing the recommendations:
 - those actions that will be started (and potentially implemented) in 2025 based on the current resourcing of the RDEA and where changes could be made to the PRDE without requiring ACCC reauthorisation.
 - those actions that would involve broader changes to the text or operation of the PRDE that will be subject to further consideration in 2026 (including consideration of how those changes, if adopted, would require changes to the fees paid by signatories). Those changes may then be dependent on ACCC reauthorisation (which must be obtained by December 2026).
- The RDEA will work with signatories and – where appropriate – other stakeholders on the detail of the actions taken to implement the recommendations.
- To the extent possible (and provided it is consistent with the current authorisation), the RDEA will seek to give immediate effect to the spirit of the recommendations within the current PRDE framework, including applying a stronger focus on monitoring and improvement of credit reporting data quality, improving understanding of the PRDE (e.g. renaming elements of the system), utilising existing processes to allow greater flexibility (particularly when onboarding), reviewing and refining its approach to changes to the ACRDS, and taking a firmer approach to compliance.

Specific comments:

- **Recommendations 3 and 5:** the RDEA supports these recommendations, however notes that giving effect to them is likely beyond its scope. Responsibility for giving effect to these recommendations is likely to primarily sit with Arca, as industry association.
- **Recommendation 4:** the RDEA supports the view that information should not be deleted from the credit reporting system if it is otherwise accurate, up-to-date, complete, relevant and not misleading. However, the involvement of the largely unregulated for-profit credit repair industry creates problems for the whole industry (and, generally, poor outcomes for consumers). We will consult further on this recommendation before determining whether to make the recommended change (or if another type of change is appropriate).