
From: Loretta Kreet [REDACTED]
Sent: Wednesday, 2 December 2020 4:02 PM
To: Martin, Jaime
Cc: Hatfield, David; Pound, Anna; MEAD Admin
Subject: RE: ARCA application for reauthorisation (A1000521) - new submission and next steps [SEC=OFFICIAL]

Hi Martin

Having read the submission by the Privacy Foundation we agree with its contents

We believe that it is essential that the ACCC understands the impact of the credit reporting practices of lenders following the Covid 19 pandemic and the impact on the PRDE before considering reauthorisation.

We are concerned changes to the PRDE maybe necessary in the interim because of the Covid 19 pandemic to better reflect practice.

In the circumstances it is more appropriate that the PRDE is not reauthorised at this time until :

- The Impact of the proposed responsible lending laws on credit reporting are known (we note in this respect that the listing of repayment history information was endorsed by government because the lenders reporting RHI had responsible lending obligations)
- There is genuine consultation with consumer advocates in relation to the PRDE; and
- evidence of the changes of the operation PRDE during the Covid pandemic is provided.

If nevertheless the ACCC agrees to reauthorisation, reauthorisation period should be for no more than 2 years.

Kind regards

Loretta

The Consumer Protection Unit at Legal Aid Queensland provides advice and representation specialising in consumer injustices including disputes with credit providers and insurers. Advice can be booked by calling 1300 65 11 88

Loretta Kreet | Acting Assistant Director / Consumer Advocate | Civil Justice Services | Legal Aid Queensland | p [REDACTED]
[REDACTED] | f [REDACTED]