



Personal Identification
Information in Property
Data Code of Conduct

2012 – 2013

ANNUAL REPORT

Personal Identification Information in Property Data Code of Conduct

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MESSAGE FROM THE CHAIR

2012-13 was another busy year for the Personal Identification Information in Property Data (PIIPD) Code of Conduct. The year included not only the ongoing activity in connection with complaints and requests for the suppression of personal identification information but also the completion of the first of the independent triennial reviews of the Code of Conduct and a change in the Consumer Representative on the Code Oversight Committee.

The triennial review is prescribed under Clause 18 of the Code of Conduct. Galexia Pty Ltd was engaged to undertake the review and the review and its outcome are discussed later in this report.

I would like to take this opportunity to thank Ms Kris Day, Ms Fiona FitzPatrick and Mr Kris Matthews for their contributions to the work of the Code Oversight Committee and their support for the Code.

Ms Day was the original Consumer Representative on the Code Oversight Committee and made a major contribution to the Code's implementation and early years of operation. As from 3 December 2012, Ms FitzPatrick became the new Consumer Representative and quickly became not only an advocate for consumers' interests under the Code but also an active contributor to the Committee's capacity to respond to the demands placed on it. The Committee's Industry Representative, Mr Matthews, has extensive industry knowledge which has greatly assisted the Committee to forge effective partnerships with Code Subscribers and to help educate and support Subscribers to meet their compliance responsibilities under the Code in a highly dynamic industry.

Particular thanks must also go to Ms Jodie Hughes, who is the System Administrator for the Code of Conduct and who provides efficient secretariat support for the Committee.

Of course the Code of Conduct and the work of the Code Oversight Committee rely on the ongoing financial and complaint management support of members of the Value Added Property Data Broker Association Incorporated (VAPIBA). I am also grateful to the staff of the Department of Natural Resources and Mines who readily provide advice and assistance.

Neil Lawson - *Chair, Code Oversight Committee*

THE CODE OF CONDUCT

The Code of Conduct was introduced on 1 October 2009, (when it was known as the QVAS Code of Conduct) to address concerns about the use of personal identification information being sourced from the Queensland Valuation and Sales (QVAS) database maintained by the Department of Natural Resources and Mines (DNRM). The database includes the following information:

- details of the property, including the street address
- transaction details (e.g. purchase price and type of sale); and

- other relevant details in particular the names and service addresses of vendors and purchasers of properties.

The 'service address' is the address nominated by the property vendor or purchaser for the receipt of official correspondence and in some circumstances may differ from the property's street address. Investor-owned as distinct from owner-occupied properties will frequently have service addresses different to the property's street address.

Access to the information held in the QVAS database is available to individual businesses, industry professionals and members of the public and can be obtained over the counter for a fee from DNRM. The information is generally accessed by potential purchasers and professionals acting in property transactions, for example, real estate agents, financing sources (e.g. banks), solicitors and valuers.

Information Brokers

Subscribers to the Code include all the major property data information brokers operating within Australia. Code Subscriber membership is mandatory for a broker seeking to access personal identification data from QVAS. Contact details for each of the Subscribers to the Code are listed on the scheme website and in Appendix E to this report.

Before an information broker will be licensed by DNRM to have electronic access to the QVAS data, the broker must be approved by the Code Oversight Committee as a Subscriber to the Code and must agree to comply with the Code.

Licence Agreements

The Queensland Government enters into licence agreements with individual information brokers enabling them to access QVAS data electronically on a wholesale basis. The QVAS data fields containing the names and service addresses of purchasers and vendors ('QVAS Identified Information') are only accessible to approved information brokers who subscribe to the Code.

A number of brokers' clients (Code Subscriber Customers) also access QVAS data through products distributed by the information brokers. These clients include real estate agents, lawyers, valuers, surveyors, financial institutions and members of the public. The products include additional data added by the information brokers from other sources. These may include, for example, photographs of the property or a map showing the property's location.

Direct marketing

The Code is designed to prevent personal identification information in QVAS data being used for unsolicited direct marketing by the clients of licensed information brokers. Direct marketing can include telemarketing, bulk email messaging, postal mail-outs and list brokering.

The Code of Conduct prohibits direct marketing where the name and or address for service are obtained from the QVAS database. Consumers can lodge a complaint with a Subscriber (information broker) or with the Code Oversight Committee if they believe that prohibited direct marketing has taken place or if the Subscriber, or their clients, have otherwise breached the Code.

The Code is not breached where personal details are obtained from sources other than the QVAS database. Other sources of data include, for example, telephone directories and names and addresses collected when members of the public enter competitions using their personal contact details.

THE CODE OVERSIGHT COMMITTEE

The role of the Code Oversight Committee includes the following:

- approving and registering Information Brokers as Code Subscribers;
- monitoring compliance with the Code by its Subscribers and their clients and to ensure ongoing effective operation of the Code's requirements;
- receiving and investigating unresolved complaints;
- imposing sanctions on Subscribers for failure to comply with the Code;
- maintaining a Register of Suppression Requests; and
- maintaining a Register of Excluded Parties

The Committee also has reporting obligations and to this end it gathers, monitors and reviews data which is included in its Annual Reports. It also commissions an independent review of Code operations every three years.

The Code Oversight Committee consists of an independent Chair, a consumer representative and an industry representative. Current members are:

Neil Lawson - *Chair*

Neil Lawson is the independent Chair of the Code Oversight Committee and is nominated by the Minister for Natural Resources and Mines.

Mr Lawson has worked as a management consultant and has held executive management positions in the private and public sectors. He is a past Commissioner for Consumer Affairs for Queensland. Mr Lawson is an ethics consultant and trainer in workplace conduct matters in the public sector.

Kris Matthews - *Industry Representative*

Kris Matthews has over 15 years' experience in the real estate and information technology industries.

Mr Matthews commenced with Micro Developments in May 1997 which was later acquired by RP Data in November 1999. In his current role he is responsible for overseeing Industry Development, which includes strategic partnerships, acquisition and management of the RP Data SME Sales Teams.

Fiona FitzPatrick - *Consumer Representative*

Fiona FitzPatrick has worked in legal and managerial roles in both the private sector and with the State and Federal governments. Her experience at the Office of Fair Trading has given her an understanding of consumer issues, including direct marketing, from the

perspective of both consumers and business. Ms FitzPatrick also has expertise in dispute and complaint management and in alternative dispute resolution.

Jodie Hughes - Systems Administrator

Jodie Hughes is the Systems Administrator for the Code Oversight Committee and VAPIBA. Her role includes administering the Code of Conduct's website.

Ms Hughes has been employed by RP Data for over five years with roles as an Executive Assistant and the Assistant Privacy Officer. Prior to her commencement with RP Data, Ms Hughes worked in the real estate industry for five years.

Ms Hughes contributes to case management by documenting and recording all incoming correspondence and alerting Code subscribers to complaints received. Ms Hughes also assists with quality assurance and the management of external relationships.

TRIENNIAL INDEPENDENT REVIEW (GALEXIA REVIEW)

In 2012-13 the first three-year review of the operations and effectiveness of the Code of Conduct was completed. The review, which also assessed the effectiveness of the Code Oversight Committee, was conducted pursuant to Clause 18 of the Code of Conduct. The review will be published on the Code website.

The Committee commissioned Galexia Pty Ltd to prepare the report, which was paid for by VAPIBA. Galexia considered the Code of Conduct in the context of industry best practice for codes of conduct and made a number of findings and recommendations. It found that the Code was operating in accordance with (or above) contemporary standards of best practice. The review also suggests that the Code presents a positive case-study (for industry and government) on the introduction of co-regulation in an unregulated and complex sector.

The review identifies two areas in which there is some room for improvement. The first relates to the way in which the Committee monitors compliance with suppression requests and consumer complaints. To date the Committee has been focused particularly on industry engagement and on establishing the Code processes. The Committee accepts that as complaint numbers and suppression requests grow, its role in monitoring the compliance and enforcement of the Code will also increase. Reporting on suppression requests and the progress of complaints received are standing agenda items for Committee meetings.

Secondly, the report identifies opportunities for enhancing the way in which the Code is promoted to Subscribers and industry bodies. The Committee agrees with the observation that Code administration bodies should be responsible for ensuring that a Code is adequately promoted. The Committee believes that the Code already has a high profile amongst subscribers, evidenced by the regular meetings of VAPIBA. However, it is concerned with the finding that the public profile of the Code is low, and it accepts that more can be done to raise the profile of the Code and to make it better known and

accessible to consumers, whose personal identification information is at the core of the Code of Conduct.

The Committee has identified cost effective strategies to promote awareness of the Code of Conduct amongst all stakeholders, including consumers, consumer organizations, industry and regulatory bodies, which do not impose unnecessary additional costs on Code subscribers. Opportunities for Code promotion include:

- encouraging Subscribers to include a link to the Code website and a copy of the Committee's consumer information brochure on their websites;
- collaborating with groups such as the Real Estate Institute of Queensland (REIQ), the Valuers' association, and the Queensland Law Society;
- providing occasional articles about the Code of Conduct for inclusion in industry and community newsletters;
- providing a guest speaker to industry, consumer and regulatory agencies' events; and
- distributing information to bodies such as Community Legal Centres.

The Committee has already adopted some of Galexia's recommendations, for example it has enhanced the profile of the Code website by providing direct links from related websites, including the Office of Fair Trading and Department of Natural Resources and Mines websites, with the cooperation of those agencies. It has also begun to explore more effective partnerships with consumer protection bodies.

The Code website, www.propertydatacodeofconduct.com.au offers comprehensive information for both consumers and industry about their rights and obligations under the Code. Both complaints and suppression requests can be lodged online.

INDUSTRY REPORT

Industry Representative's Report

In the fourth year of operation it has been a pleasure to see the commitment of both the information broker industry through the Value Added Property Information Broker Association Incorporated (VAPIBA) and the continued support of fellow Code Oversight Committee members, Neil Lawson and Fiona FitzPatrick.

This year continued the good work of prior years, in particular the receipt and handling of 43 suppression requests via the Code's website. VAPIBA has funded and commissioned the first independent review of the Code's initial three years of operation, which pleasingly verified the success of the Code driven by the support of the self-regulation model by the information broker community.

In closing I would like to thank the past and current members of the VAPIBA, especially the current Committee members for their time and efforts to ensure the Code remains a success.

Kris Matthews - Industry Representative, Code Oversight Committee

VAPIBA PRESIDENT'S REPORT

It's pleasing to see that members continue to conduct their businesses within the spirit of the Code of Conduct. The Code continues to work effectively in enabling the management of suppression requests and in managing any issues that may arise.

The Association continues to effectively fulfill its part in providing the means that enable the operation and administration of the Code.

I note that there have been no serious infringements over the past 12 months or indeed that no organisations have been excluded from access to Queensland Valuations and Sales Data. This is testament to the good work of all involved in drafting the Code and to the efforts of members in implementing the Code in their business practices.

I welcome the PIIPD - Code of Conduct Review finalised earlier this year. The Code stipulates that a review of its operation and effectiveness must be carried out every three years. It is a sensible requirement that the Code should be reviewed after the first three years of operation. I thank members for supporting the review. The Association has had the opportunity to provide our feedback on the review to the Oversight Committee.

On behalf of the Association I welcome Fiona FitzPatrick as the new Consumer Representative to the Code Oversight Committee and wish her well in that role. I would like to acknowledge the contribution made by Kris Day as the inaugural Consumer Representative and one of the founding members of the Code Oversight Committee and thank her for all her efforts over the past few years.

Yan De Horta - President, Value Added Property Information Broker Association Incorporated

REPORT FROM CONSUMER REPRESENTATIVE

This report sets out the key findings of the independent review into the first three years of the Code's operations and its effectiveness. As the incoming Consumer representative, I am pleased with the finding that the co-regulation model for the Code meets "best practice" standards, and that the Committee has handled any teething issues "*positively and pro-actively*".

The review identifies opportunities for improvements to the Committee's operations. These include enhanced:

- monitoring of complaint handling by subscribers and of compliance with suppression requests; and
- promotion of the Code with a particular focus on consumer awareness about their rights under the Code.

These opportunities will be the focus of my efforts in the coming year.

The Code was introduced to protect consumers' privacy and, in particular, to ensure that their personal information is not used for unsolicited direct marketing. I welcome feedback from consumers or consumer groups about how I can most effectively represent their interests under the Code.

Fiona FitzPatrick - *Consumer Representative Code Oversight Committee*

SUPPRESSION REQUESTS

Consumers can apply to suppress the name or names of the persons who are purchasers or vendors and their service address. A current Council rates notice must be produced as evidence of the applicant's standing to make the request. Corporate property owners, i.e. property owned by incorporated bodies, are not eligible to apply for suppression.

Code subscribers must suppress any personal identification information within their systems within thirty days of receiving the request.

Table 1 - Total of Suppression Requests (The Code commenced on 1 October 2009)

	1 Oct 2009 to 30 September 2010	1 Oct 2010 to 30 June 2011	1 July 2011 to 30 June 2012	1 July 2012 to 30 June 2013
Lodged	93	14	46	43

COMPLAINTS AND DISPUTES RECEIVED IN THE REPORTING PERIOD

Complaints

During 2012-13 there were 22 complaints received. Ten were lodged directly with Code Subscribers while a further 12 were received by the Code Oversight Committee and referred to the relevant Code Subscribers for investigation and resolution. This contrasted with the previous year, 2011-12, when there had been 42 complaints received by Code Subscribers, of which four were received by the Code Oversight Committee and referred to the relevant Subscriber.

All the complaints received in 2012-13 were investigated by the Code Subscribers' internal complaint management officers and reports sent to the Code Oversight Committee when the matters had been resolved.

Of the 22 complaints investigated, nine involved Real Estate Agents who were found to be in breach of the Code of Conduct. In each case, the respective Agent was given a warning and

required to attend training on their obligations under the Code of Conduct, with an emphasis on the prohibition of direct marketing as provided for by the Code.

Other sanctions which can be applied by the Committee under the Code when breaches are found to have occurred are set out in Clause 16 of the Code. Where serious and or systemic breaches have been found, the offending parties may be listed on the Register of Excluded Parties. Excluded parties are denied access to QVAS personal identification information data. A Code Subscriber's client, such as a real estate agent, who is listed as an 'Excluded Party', cannot obtain QVAS personal identification information data from any other Code Subscriber.

FINANCIAL STATEMENTS

1 July 2012 - 30 June 2013

Code Subscriber Contributions	48,000.00
Oversight Committee Fees – Chair Neil Lawson and Consumer Representative Kris Day	10,740.92
Oversight Committee Fees – Industry Representative Kris Matthews	Nil
Administrator Fees – Jodie Hughes	Nil
Website Development Fees	870.00
Fee - 3 year Independent Review	33,264.00
Accountant	715.00
Other Expenses – Postage, Bank Fees, lodgment fees	1,044.30

APPENDIX A - DEFINITION OF TERMS

Code Subscriber - An information broker that has agreed to be bound by the Code and has been approved as a Code Subscriber by the Code Oversight Committee.

Code Subscriber customer/client - An individual or organisation that purchases or otherwise obtains QVAS Identified Information from a Code subscriber.

Code Oversight Committee - The Committee administering the Code.

Complaint - A complaint by a consumer to a Code Subscriber concerning any act or omission by a subscriber in relation to a subscriber's product, service or a matter relating to personal privacy information. An act or omission includes offering, withholding, providing and administering a subscriber's service. Consumers may complain about the use or management of a subscriber's service. They may also complain about the failure or refusal of a subscriber to provide a service where there is an obligation to do so.

Consumer - An individual whose personal information appears in any field in the QVAS database

DNRM - Department of Natural Resources and Mines responsible for the QVAS database

Direct Marketing - One to one marketing, normally supported by a database, which uses one or more media to affect a measureable response and/or transaction from a person and includes, but is not limited to, telemarketing, bulk email, postal canvassing and list brokering

Dispute - A dispute can be defined as a complaint by a consumer or government agency to the Code Subscriber concerning a product, service or privacy issue which has not been resolved through the internal complaint resolution process of the subscriber within 30 days after notification that it exists, or the consumer has notified the subscriber that its formal proposal to resolve the complaint is not acceptable, whichever is the earlier.

End User - A number of information brokers have been granted access to bulk data from QVAS. This is in the form of a licence agreement obtained through DERM. A number of brokers' clients also access QVAS data through products distributed by the information brokers.

These products include additional data added by the information brokers from other sources. These may include photos of the property or a map of the property location.

"End users" can include real estate agents, valuation agents, surveyors, financial institutions and members of the public.

Independent Arbiter - An independent person with expertise in dispute resolution, appointed by the Code Oversight Committee.

Information Broker - Information brokers acquire data and information and provide it to their customers. The data and information is often obtained from multiple sources and is assembled according to the customer's needs.

Customers and clients of information brokers include banks, other finance providers, real estate agents, lawyers and other professional advisers, and members of the public.

Jurisdiction - The structure and operation of the Committee, and the limitations of the powers and duties of the Committee.

Personal Information - Information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the opinion or information

PIIPD - Personal Identification Information in Property Data

QVAS Database -The Queensland Valuation and Sales (QVAS) System database administered by the Department of Natural Resources and Mines.

QVAS Identified Information - Database fields containing the names and service addresses of purchasers and vendors which are only accessible to approved information brokers who subscribe to the Code.

Systems Administrator - The systems administrator manages the day to day operations of the Code.

Systemic Issue - An issue which has been raised in a dispute or several disputes which has the potential to affect consumers in addition to those who have complained to the scheme.

Terms of Reference - A written document explaining the powers, duties and obligations of the Committee as set out under the Code of Conduct

VAPIBA - The Value Added Property Information Broker Association Incorporated – the industry body representing Code Subscribers and responsible for the financial support of the Code.

APPENDIX B - COMPLAINTS AND DISPUTES

Code Subscribers are obliged to establish binding agreements with their customers, agents or other third parties wishing to access QVAS information. These agreements must reflect the prohibition on direct marketing using personal identification information. Further, the Code requires all Subscribers to have documented internal dispute resolution frameworks for dealing with consumer complaints.

Consumers must try to resolve their complaint with the Subscriber before escalating it to the Committee. If consumers make contact with the Committee before using the Subscriber's internal complaint process, the Committee will redirect the complaint to the contact person at the relevant Subscriber's office.

If the consumer remains dissatisfied with the Subscriber's response or where their complaint has not been resolved within 30 days, the consumer can escalate the complaint to the Committee by giving written notice of a dispute

Lodging a complaint with a Code Subscriber

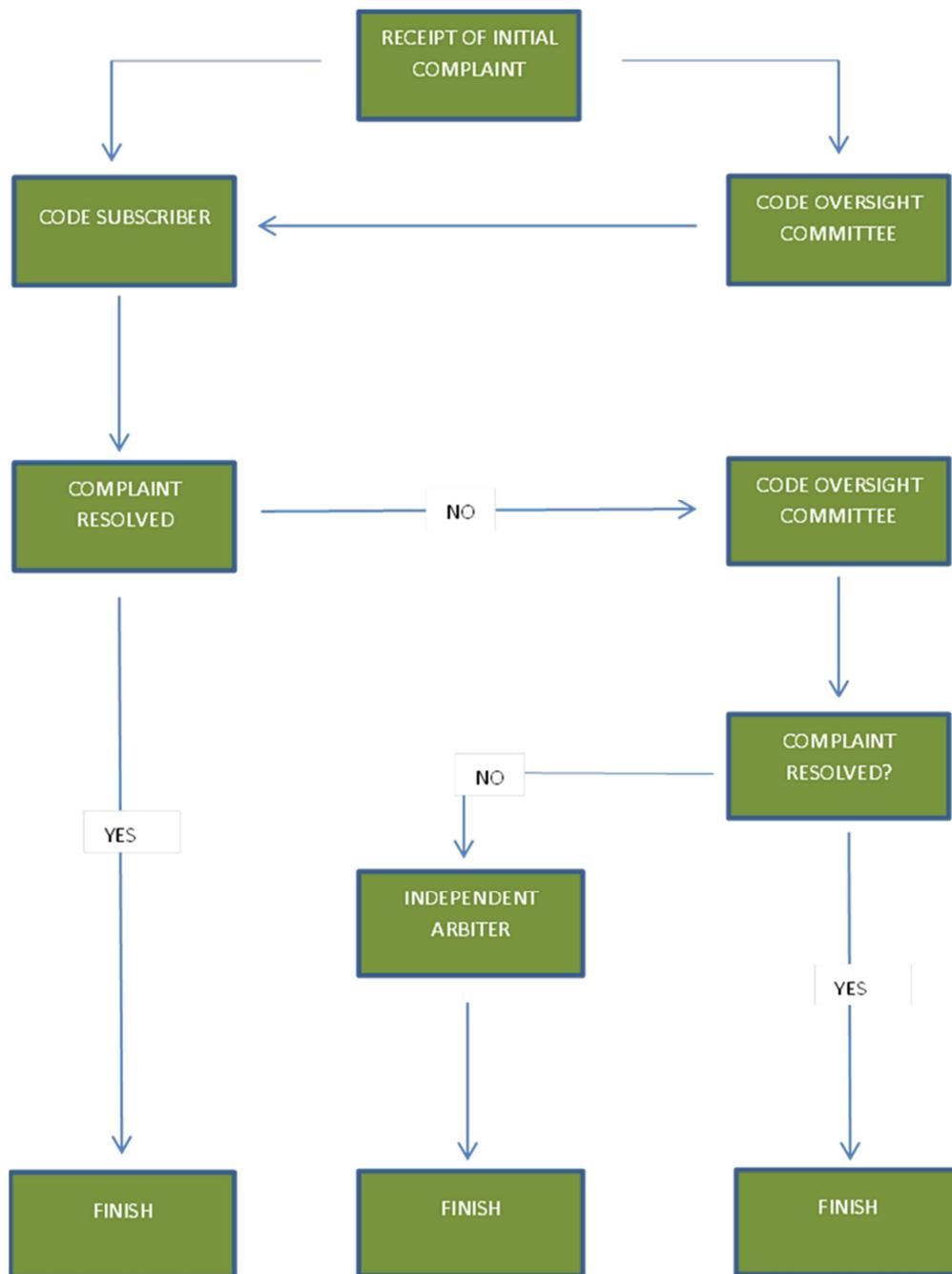
The Code of Conduct website contains contact names and other details for the nominated complaints officer at each Subscriber.

Lodging a dispute with the Code Oversight Committee

Written notification of disputes and supporting material may be lodged electronically by email with the Committee at info@propertydatcodeofconduct.com.au. If the dispute is not covered by the Code the consumer will be advised in writing. If the dispute falls within the ambit of the Code, the Committee will investigate and will make a decision.

If either the Subscriber or the consumer is not satisfied with the Committee's decision the Code allows them to apply to an independent arbiter. The cost of the arbitration is borne by the subscriber involved with no fee being charged to the consumer. The decision of the independent arbiter is binding on the Code Subscriber

The process for resolving disputes under the Code was arrived at after considering complaints processes across a broad range of industries. The process is outlined in the flow chart below.



APPENDIX C - THE COMMITTEE'S JURISDICTION

The circumstances in which the Committee may decline to consider a complaint include:

- complaints which do not involve a breach of the Code, even if the allegations in the complaint could be substantiated;
- where the complaint is outside the Committee's powers or authority as provided for by the Code;
- where consumers do not authorise the subscriber to disclose confidential information which is necessary to investigate and determine the complaint;
- complaints that on the balance of probabilities have no basis in fact; and
- complaints that the Committee has already considered and made a decision on and there are no reasonable grounds for the matter to be re-opened.

The Committee will not usually consider a complaint which has been settled. An exception may arise if there is evidence of serious or systemic breaches of the Code or if the Subscriber has not complied with the terms of the settlement.

The Committee will not accept disputes brought outside the following time limits:

- where the act or omission occurred more than 12 months before the date on which the consumer made the complaint to the Subscriber in writing; where the event occurred before the Subscriber became a Subscriber to the Code;
- where the complaint is between a consumer and an agent, the business of which has been acquired by a Subscriber, and if that agent was not an agent of the Subscriber at the time the events (which are the subject of the complaint) occurred; and
- where a complaint relates to a series of events that commenced prior to the Subscriber's date of membership and continued after this date, the Committee is able to consider the matter in its entirety (including those events that occurred prior to membership).

The Committee may refuse to revisit a dispute which has already been determined, except where it has decided that the dispute may be reopened on the happening of some specific event.

Case studies

Case studies provide consumers with examples of the sort of complaints the Committee can investigate. They also alert subscribers to best practice complaint procedures. Case studies will be published on the Code of Conduct's website.

APPENDIX D - SERIOUS AND SYSTEMIC BREACHES OF THE CODE

Identification of systemic issues

The identification, investigation and reporting of serious or systemic issues plays a critical role in raising industry standards. A systemic issue may be identified either by a number of disputes of the same type or by one dispute where the impact of the issue in dispute will extend beyond the immediate parties.

The following actions could constitute a serious or systemic breach of the Code:

- the Code subscriber's actions have caused substantial harm to consumers or the reputation of the industry;
- the Code subscriber has engaged in ongoing noncompliance;
- the Code subscriber has ignored the Committee's request to remedy a breach or failed to do so within a reasonable time;
- the Code subscriber has breached an undertaking given to the Committee.

Investigation and resolution

If the Committee determines that a serious or systemic breach has occurred, it advises the Code subscriber in writing and requests a detailed response.

Reporting

The Committee is required to report all systemic issues to the Department. When dealing with serious or systemic issues, the obligations of the Committee are

- to identify systemic issues that arise from its consideration of complaints;
- to refer these matters to the subscriber for response and action; and
- to impose remedies or sanctions.

Sanctions for Serious or Systemic Breaches

Where the Committee has made a decision that there has been a breach by a Code subscriber, the Committee may impose any of the following sanctions but are not limited to:

- issue a warning to a Code subscriber regarding the potential impact of any further breaches on future sanctions.
- publication of the name of the Code subscriber and the nature of the serious or systemic breach in the annual code compliance report or in other publications

- require the Code subscriber to undertake immediate remedial action including, but not limited to, changes to documentation or internal processes, and/or corrective advertising;
- require the Code subscriber to remove QVAS Identified Information from its data
- require the Code subscriber to remove specified Personal Information from its data
- require the Code subscriber to cease providing data and/or services to a Code subscriber's agent or other third party
- suspension from membership of the Code for a period of between one and six months, at the discretion of the Committee, and/or
- permanent suspension from membership of the Code and listing on the Register of Excluded Parties.

In cases where the Committee has determined to impose a sanction that involves suspension from membership of the Code, the Committee will advise the Department, so that it will then suspend provision of Personal Information under the subscriber's licence.

Recording of Systemic Issues

The Committee is responsible for the recording and maintenance of the Register of Excluded Parties.

APPENDIX E- LIST OF SUBSCRIBERS TO THE CODE

RP Data Pty Ltd 6 Eagleview Place, Eagle Farm Qld 4009

CITEC Confirm Level 3, 192 Ann Street, Brisbane Qld 4000

GlobalX Information Pty Ltd GPO Box 2746, Brisbane Qld 4001

Residex Pty Limited 6/21 Walker Street, North Sydney NSW 2060

Veda Advantage Information Services and Solutions Limited

Level 15, 100 Arthur Street, North Sydney NSW 2060

Australian Property Monitors Pty Ltd Level 1, Darling Island Road, Pyrmont NSW 2009

onthehouse.com.au Pty Ltd 4/55 McDougall Street, Milton Qld 4064

Property Data Solutions (PriceFinder) 92 Petrie Terrace, Brisbane Qld 4000

Searchess Pty Ltd Lvl 9, 333 Adelaide Street, Brisbane, Qld 4000

InfoTrack Level 8, 189 Kent Street, Sydney NSW 2001

Code Oversight Committee

PIIPD Code of Conduct

GPO Box 1815 Brisbane, Queensland 4001

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