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CONSUMERS' FEDERATION



OF AUSTRALIA

Committee Secretary
Senate Legal and Constitutional Committee
Department of the Senate
Parliament House
Canberra ACT 2600

4 MAR 2005

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By facsimile: 02 6277 5794

Dear Sir/Madam,

Re: Inquiry into the Privacy Act 1988

The Consumers' Federation of Australia (CFA) is the national peak body for consumer groups in Australia. CFA's 95 members include legal centres, health rights groups, local consumer organisations and public interest bodies. CFA's role is to put the view of its member organisations to government and industry and advocate on behalf of consumers. Established in 1974, our focus is primarily on advancing the interests of disadvantaged or vulnerable consumers.

We fully endorse the submission of two of our members, the Consumer Credit Legal Centre (NSW) Inc. ('CCLC') and the Australian Privacy Foundation ('APF'). In particular:

- We fully support CCLC's submission that the current credit reporting system is riddled with problems. The observations made are common amongst a number of our member organisations.
- We submit that there needs to be rigorous procedures in place to obligate credit providers and credit reporting agencies to ensure that all credit reports are accurate, complete, up-to-date. We support the recommendation for the imposition of a civil penalty.
- We strongly resist any move extension towards full-file credit reporting, particularly in view of the many problems with the current system.
- We support CCLC's call for the Federal Privacy Commissioner to review the Credit Reporting Code of Conduct;
- The Office of the Federal Privacy Commissioner is not an appropriate regulator of credit reporting, and this is further exacerbated by the lack of transparency of the complaints procedure between Baycorp and the OFPC. The complaints-handling procedures need to be reviewed.

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We urge you to fully consider the submissions made by CCLC and the APF. Should you require further information please do not hesitate to contact the writer on 02 9212 4216.

Yours faithfully,



Katherine Lane
Consumers' Federation of Australia