

TRANSCRIPT

STANDING COMMITTEE ON THE ENVIRONMENT AND PLANNING

Inquiry into the proposed long-term lease of land titles and registry functions of Land Use Victoria

Melbourne — 5 July 2018

Members

Mr David Davis — Chair

Mr Nazih Elasmr

Mr Cesar Melhem — Deputy Chair

Mr Daniel Mulino

Ms Melina Bath

Ms Huong Truong

Mr Richard Dalla-Riva

Mr Daniel Young

Participating Members

Mr Jeff Bourman

Mr Simon Ramsay

Ms Samantha Dunn

Dr Samantha Ratnam

Mr James Purcell

Ms Jaclyn Symes

Witnesses

Mr Tom Champion (affirmed), President,

Ms Kellie Dean (affirmed), President-elect, and

Mr Scott Jukes (affirmed), past President, Institution of Surveyors Victoria.

The CHAIR — I welcome from the Institution of Surveyors Scott Jukes, the past president; Tom Champion, the president; and Kellie Dean, the president-elect of the institution. If I could ask perhaps Tom — or amongst yourselves — to lead off with some evidence, we will then follow with some questions. Thank you for doing so.

Visual presentation.

Mr CHAMPION — Thank you, Chair, and the committee, for inviting the ISV to provide a submission to this inquiry. I am obviously aware that you have heard many submissions to date over the course of the month, so we hope that we are still able to provide some value and some useful insights for your deliberations.

The ISV is the peak professional association for land surveyors in Victoria. Since 1874 the ISV has worked with government to improve and safeguard the property boundary system which underpins Victoria's cadastral base land administration economy. The ISV represents the largest number of individual licensed surveyors in Victoria and has two member nominees on the Surveyors Registration Board of Victoria. It also provides governments, academia and the community with the collective opinion of the surveying profession.

Licensed surveyors play an essential role in partnership with government via the Registrar of Titles and the Surveyor-General to maintain the land boundary framework upon which the registration of title dealings and transactions are based. The land surveying profession is a unique and highly specialised profession that is regulated by the state to serve the community by providing confidence in Victoria's land boundary system. Confidence in an efficient and effective title boundary system bolsters that certainty inferred by government's guarantee of title that underpins the Victorian state economy.

With this particular matter we have partnered with the Association of Consulting Surveyors Victoria in making a representation on this issue. The ACSV are a little bit different to us. They represent the surveying businesses across Victoria and share common opinion and concerns with the ISV on this proposed commercialisation. The ACSV have provided separate evidence to this committee earlier in the month.

I will quickly run through an overview of our journey so far and thoughts on this issue and then pass to my colleagues here for further commentary with regard to the committee's terms of reference before concluding the presentation with our thoughts on the performance requirements of the commercialised land registration system.

The ISV has been following the issue of commercialising the land titles system closely since early proposals were announced to commercialise the New South Wales titles office. Since then and through the course of the Victorian government's own deliberations we have consulted with various agencies to better understand the objectives and the risks associated with such undertakings. Our consultation to date has included meetings with the Treasurer, representatives from DTF and their consulting teams, representatives from Land Use Victoria, the former though incumbent at the time CEO of land registry services in New South Wales — i.e., the private operator — and the Registrar-General of New South Wales and representatives from the cadastral integrity unit in South Wales, so the regulator side up there.

We have also sought opinion from Dr Keith Bell, the former Surveyor-General of Victoria and now land administration adviser with the World Bank. Dr Bell subsequently published a paper titled *Global Experiences with Public Private Partnerships for Land Registry Services: A Critical Review*. We note that the views and opinions expressed in the paper were his and not necessarily those of the World Bank. This paper was published in ISV's professional magazine, *Traverse*, and will be formally submitted to this committee separately to this evidence.

The CHAIR — I was going to ask you for a copy because I know Keith Bell. He is a remarkable individual.

Mr CHAMPION — Yes. We will highlight some key parts of that formative paper. We are appreciative of the opportunity to consult with the Treasurer and DTF and thank the Treasurer for his commitment to ongoing consultation with the ISV. The Treasurer and DTF have acknowledged that the valuable insights provided by the ISV and the ACSV through the scoping study informed their decision to remove the subdivisions and applications branch from the commercialisation scope. These insights assisted the DTF in determining that these important functions of the land registration business carry too significant a risk for them not to remain under public control.

Whilst the title boundary system is promised to remain under public control, this system is highly integrated with the registration system that is proposed to be commercialised. The title boundary system, which licensed

surveyors maintain in partnership with the Registrar of Titles and the Surveyor-General, is the physical representation of the extent of ownership that title guarantees; hence our ongoing concern and interest when core functions of one part of that partnership are proposed to be commercialised. We understand the government feels that the registration aspects are administrative by nature and so the associated risks are low. However, it is our view that the registration is not purely an administrative function. The long-established processes, policies, legal precedents and most importantly the expertise across the partnerships are what provide efficiency and integrity to the registration process. That process brings accuracy and reliability to the information in the land titles system, thereby enabling the community's confidence in the land titles system and other essential government map-based services.

The quality of the relationships and the trust between partners is a key factor in providing security to transact in good faith, with reasonable certainty and low risk of potential system failure. Our dialogue with DTF officers has been constructive to date. However, more recently our engagement has stalled over differences of opinion over a confidentiality agreement proposed by DTF that we believe is unworkable in the context of ISV's core objectives and accountability to our members.

From the engagement to date we believe that a number of critical issues remain unresolved, and resolution of these matters would be required before we can provide an informed view to industry and the general public that confidence in the efficacy of Victoria's land titles system is assured. Our unresolved concerns primarily revolve around three important issues — firstly, the need to ensure the role of properly qualified, trained and experienced staff in the operation of the cadastral system; secondly, a commitment to price certainty and an assurance that fees cannot be excessively driven up by a private operator; and, thirdly, an effective mechanism for recourse for government and the community in the event of system failure following any transition to a private operator for these important public functions.

In outlining these concerns it is again important to recognise the importance of public confidence in the cadastral system. While the workings of the system are little seen and little understood by many in the community, the certainty the system provides is central to the entire basis of land ownership and effective land management. This impacts on fundamental aspects of community life, from home ownership — probably the single biggest investment decision most Victorians will make — to the management and control of community infrastructure. I will pass to Ms Dean to comment on some of the other issues around service costs and expertise, if that is okay.

Ms DEAN — Thank you. To date in our meetings with DTF and their consultant advisers we have heard some high-level concepts, and delivery objectives have been outlined. ISV is eager to understand more details about the proposed operating model. As practitioners within the current system the surveying profession is well-placed to contribute real insights and useful suggestions regarding important elements of any proposed system. For instance, a number of matters will need careful consideration, including the following:

Certain core registration functions are currently being undertaken by the subdivisions branch. The legal branch and applications branch also support the registration staff. These branches will be retained under public control. If there is a complex registration dealing following a subdivision registration, currently this is done by the subdivision branch.

Therefore: will the private operator have the necessary expertise, even by retaining current staff, to do the work currently done by all the various branches comprising the registration services currently?

Unless experienced staff can be sourced or retained by the private operator, the state may need to provide support for registrations. If core services are outsourced, what impact will this have on the operator's accountability for timely service?

In addition to experienced staff being retained by the private operator it would be prudent for government to consider how to best support difficult registrations, especially where a private operator may not be able to efficiently deliver registration of all dealing types. This matter ensures the government, and the public, gets the service it is paying for and good value for money.

Unfortunately staff who understand all dealing scenarios cannot be trained in our complex registration system quickly, so the private operator may not be able to deliver staff trained in dealing with complex registrations within a two-year time frame. There are some scenarios which may only pop-up once in every five or 10 years,

which would be extremely difficult for a private operator. This may affect service levels by causing delays in registration not only in the first two years but ongoing over the lifetime of a 40-year tenure. This may result in ongoing cost to the community and lack of confidence in the system for an extended period of time.

The complex issue of defining which registration dealings will be the responsibility of the private operator needs to be understood. What core services will be in the scope of the private operator, and where is the line between core and non-core services? Will non-statutory fees be able to be challenged by the private operator?

Currently the surveying profession enjoys a collaborative relationship with Land Use Victoria whereby the profession can contact LUV to discuss registration matters, seek advice and interpretations, and LUV staff regularly present to the professional body seminars. Will new and additional cost structures be placed around these non-core services currently enjoyed by our community? We are keen to see this collaboration with LUV continue as it is a collaboration that has been ongoing for 150 years and is integral to the integrity of the cadastral system and the Victorian cadastre. Certainly the private operator will rely on the expertise of the surveying profession to deliver high-quality products for registration, so it is important that competent staff can exercise leadership, discretion and probity to resolve registration issues and make decisions to achieve efficient outcomes for applicants.

Clear lines of decision-making responsibility will be needed, with effective and accountable oversight. Independent oversight of the private operator will be required to ensure that they are meeting any set KPIs appropriately and are not registering dealings with errors or omissions, in a timely manner at the expected current cost.

We are keen to engage further with DTF to assist in understanding of core and non-core services and the development of appropriate KPIs to hold the private operator accountable for retention of key staff and expertise, retention of sufficient capacity to deliver accurate registrations in a timely manner and to prevent fee escalation.

The slide on the screen shows the current set-up of Land Use Victoria. We have added some notes. Will the subdivision branch continue to support registration branch core services with expert human resources? Will there be a continuation of human resources from registration branch to support the activities of the Office of Surveyor-General Victoria? Will there be a continuation of funding from the registration branch to other parts of Land Use Victoria?

Mr CHAMPION — Thanks, Kellie. Scott has some comments.

Mr JUKES — Thank you, Chair and committee. In jurisdictions where commercialisation has proceeded, little is publicly available that fully reviews how the broader issues were considered or rigorously fact checked. This makes it difficult to determine the provenance of research premises and the rigour of argument threads. Also, comparing the success or otherwise of how different jurisdictions have implemented commercialisation is further complicated by local factors that may not have been fully considered in reviews. Put simply, growing apples is different from growing bananas.

Dr Bell's paper, as mentioned earlier and submitted today, summarises useful case studies and asks, I feel, important questions regarding the experiences of different jurisdictions which have considered partnering with the private sector to deliver land registration services. Dr Bell identified substantive issues emerging from the case studies which include — and there are some dot points there; I will read them — understanding the real return of any deal using Net Present Value methodology computed over the lease period; strengthening governance, transparency and accountability; ensuring roles of statutory officers are fit for purpose; law enforcement access to personal information, especially to support crime management and investigate money laundering; government agency access to information, including public or Crown lands held in title; contractual remedies; and any impacts on financial institution requirements.

In summarising his section on safeguards Dr Bell raises the important distinction between identifying the safeguards and the challenge of ensuring compliance. ISV shares these concerns. Even if the minimum safeguard factors are in place to facilitate commercialisation, what can it guarantee?

This committee has already heard that a dealing registered on title infers the legal recognition of an altered interest as it affects a real-world landholding. Although boundary positions registered on title plans are not

covered by the state's guarantee of title, confidence in their boundaries is a key element that supports public perception of title protections. Therefore it is important to ensure that proposed changes to registration improves the link to, and supports confidence in, the land boundaries upon which the title transactions are based.

Any real or perceived changes in the way title dealings, and references to land boundaries, are managed increases risks of threat to public confidence in the land tenure system. It is important to thoroughly review and address all the critical parts of the registration system when implementing change. This especially includes the elements which may fall outside governments' desired functional model scope or information technology's mechanisms. Considering these matters will minimise unintended consequences and adverse impact on public confidence.

The impact on public confidence of changes in land administration systems can be seen in recent media coverage. For instance, ABC's *Media Watch* on 18 June 2018 highlighted issues in reporting foreseeable fee increases in New South Wales following commercialisation of their land registry. Also, over a week ago The Age online published articles on the theft of settlement moneys in Victoria associated with the electronic conveyancing of properties. Such failures may represent a statistically insignificant percentage of dealings. However, the scale of what can go wrong at a personal level can reverberate negatively on perceptions of security and confidence in the system, and this is before the details of the matters are properly investigated, let alone resolved.

This illustrates the importance of carefully investigating all current interfaces with the system and adequately addressing risks. An important way to do this would be to ensure that the scope of a proposed model and delivery objectives — i.e., inclusions and exclusions — are not confined too narrowly or unduly influenced by what officials can achieve in ambitious time frames. Addressing a wider set of considerations is essential to a successful implementation of change.

It would be prudent to consider the impact of proposed changes on the overall health of the registration system. If the new model has potential to lead to a failure, it must be tempered by judicious investment in bolstering the other supporting elements, which might be considered out of scope by the government's review.

We are yet to be convinced that these issues have been adequately resolved in other recent commercialisation processes of land registry functions in other jurisdictions. And similar concerns have led some governments in those international jurisdictions deciding against commercialisation of elements of the cadastral system.

Mr CHAMPION — Thanks, Scott. My colleagues and I regarding this committee's terms of reference have attempted to outline the various aspects, risks and concerns of this proposed commercialisation that we feel are of importance to the ISV members, the community and this committee's deliberations. We have articulated to this committee and previously to the Treasurer and DTF our primary unresolved concerns and how resolution of these concerns would be required before we can provide an informed view to industry and the general public that confidence in the efficacy of Victoria's land titles system is assured.

To ensure both our unresolved concerns are met and public confidence in the land titles system is maintained, the ISV would like mechanisms built into the performance requirements of the commercialised system which would provide a system of accountable and verified reporting to be provided to the Parliament annually which incorporates both historical and projected costs and cost variances for core and non-core services provided by the new operator; performance against targets for timeliness and quality of service provided; levels of complaints and disputes; efficiency and effectiveness of dispute resolution procedures; human resources measures, including level of skills and training maintained by staff; and employee satisfaction, retention of staff and expertise, with penalties to apply for failure to meet those targets. That concludes our presentation. Thank you, Chair and committee, for your attention.

The CHAIR — Can I thank you for the presentation. I note Dr Bell's work, and we will work our way through some of that. As I understand it, you are not necessarily opposed to the commercialisation; it is just a list of requirements that you think are there that need to be met before you would be secure in supporting it. Is that a fair description?

Mr CHAMPION — We do not have a position yet because we do not have enough information to form that position ultimately. Yes, we have got concerns; we have articulated those, and we now want to work towards those mechanisms and work towards ensuring the performance requirements are met.

The CHAIR — All right. That is the first point. The second is: if we could perhaps leap back to that earlier chart, if that is possible, I want to just come to some of Kellie's points. Again, given the incomplete information that we all have, this is the best that we have, that those three functions are the scope of the commercialisation. If I am summarising what you said, Kellie, the concern is that the informal arrangements that occur with the subdivision group and with the surveyor may not be maintained, and there is no guarantee that they would be maintained, in the proposed commercialisation.

Ms DEAN — That is correct. We do not have the information to understand what the core service is going to be that is privatised. Currently we know that the subdivision branch assists with some of the registration types, so we are just concerned that if parts of it are commercialised, there may be some parts that are needing assistance from other branches.

Mr CHAMPION — Further to Kellie's points, there is expertise in the subdivisions branch that is undertaking core services for registration — complex issues — and if there is a scope around registration, then are they going to continue to outsource their core responsibilities to the elements that are retained under public control?

The CHAIR — So in one sense it is a boundary issue, in another it is an actual function that sits over in subdivisions that is not captured by this commercialisation but might be. I am trying to summarise this.

Mr CHAMPION — Yes. There is a core service of registration and a core function. There are things that are very complex in nature and they need people in the subdivisions branch to do that because of its complex nature. So if they are going to put a boundary around what is to be commercialised, are we still going to have a situation where the expertise is sitting outside and core functions continue to be outsourced to them rather than retained in registration as per their scope of services.

Mr JUKES — We have not seen any detail as to how a privatised entity would make a decision on whether or not a dealing or a registration is complicated or not.

Dr RATNAM — Could I ask a follow-up question to that? In your discussions with the department or the Treasurer — I am not sure of the scope of those discussions — have you raised those points to date? Have there been satisfactory responses to that, or has it been taken on notice?

Mr CHAMPION — It has been taken on notice, and I think it is fair to say we would consider those responses a little bit unsatisfactory because they have not looked into the detail. So in that outsourcing there is a concept of core and non-core services. There is a concept of complex registrations. We posed the question about 'Where do you draw the line on what is complex?'. Complex is a very arbitrary thing that can be highly affected by the experience of the staff you have got. Currently complex things get outsourced. If that line shifts, then what is being outsourced and what is not? What is the responsibility of the private operator?

The CHAIR — But it is fair to say that your organisation would be prepared to assist in drawing the boundary.

Mr CHAMPION — Yes, of course.

The CHAIR — Just to follow up, and I have asked a version of this question of others, parallel with this process of commercialisation we have the PEXA process advancing. We have got a drop-dead date on 1 October. We have also had a series of fee increases with PEXA. Do you think that they will feed into the cost structures of a commercialised office? Is this preparatory to the commercialisation that the fees for PEXA have gone up?

Mr CHAMPION — It is probably a difficult question for us to answer, but I would say we have received assurance that fees will not go up apart from the CPI increases. That is probably the extent of what we know on that issue.

The CHAIR — Just a historical question: have fees at the titles office gone up with CPI. or have they gone up at a lesser rate over a longer period?

Mr CHAMPION — I might defer to Scott. You might know that.

Mr JUKES — In recent times the fee units have gone up as the Treasurer's fee units go up.

The CHAIR — Annually.

Mr JUKES — Periodically fees are subject to reviews and change significantly. There was a significant change in the structuring of fees a few years ago.

The CHAIR — And over the longer sweep? I am thinking 30 or 40 years.

Mr JUKES — I would have to take that on notice and go through the archives.

The CHAIR — I would be interested to know because it is my sense that in fact fees might have gone up somewhat less than the CPI over that longer haul, but I am happy to have some information on that. If we could just look at that chart on the performance requirement, or the list that you had near the end of your presentation. On each of these, these points have been put to Treasury?

Mr CHAMPION — Yes.

The CHAIR — And their response has been incomplete?

Mr CHAMPION — We have put these to Treasury more recently. I am just trying to recall the time line. I mentioned the confidentiality agreement issue and that we are sort of stalling through at the moment.

The CHAIR — So you have been asked to sign a confidentiality agreement.

Mr CHAMPION — Correct. And putting that to one —

The CHAIR — Do you have a copy of that?

Mr CHAMPION — No, not yet.

The CHAIR — You don't?

Mr CHAMPION — I have got a copy but not —

The CHAIR — You might want to provide us with a copy. We would be interested to see it.

Mr CHAMPION — Further to that issue, we do not want that to let our consultations stall. Obviously we want to keep working with DTF on this issue and so we proposed to them, while we are resolving that issue, a number of performance requirements, and hopefully we can get in there to discuss some potential mechanisms to help meet those requirements. We have got a number of ideas that we want to discuss with them and this is an attempt to put the confidentiality agreement to one side so we can still work with them, because doing this we are not dealing with any confidential information.

The CHAIR — You are dealing with principles and matters of —

Mr CHAMPION — We are dealing with principles and ideas and trying to get these issues resolved. Like I say, maintaining confidence in the system is more of an open conversation. It does not need to deal with confidential contractual arrangements and things like that.

Mr JUKES — To put some context on it, we have been trying to come on a journey of knowledge with DTF and their consultants to provide our input and expertise in helping them form their view of how the system works now and what is important. The details of those deliberations, and the models that DTF have developed, we have no information on and have not seen it. In response to that we have been proposing some potential things — objectives, if you like — which ought to be considered in the absence of actually looking at a model to review and provide specific opinion on.

Dr RATNAM — Could I just ask on the question of consultations, were you consulted in the scoping study process? Were you consulted during that?

Mr CHAMPION — Yes. Through the scoping study process we had an initial meeting with the Treasurer. He made a commitment to ongoing consultation with DTF. We have probably had another three or so sessions

with DTF and their advisers on this. They were very much question/answer working sessions — more fact-finding from them about what we think is important in the system.

The CHAIR — Constructive, though. It seemed to have had some impact in terms of them taking on board issues.

Mr CHAMPION — They got information from us. I do not think we got a lot out of them about what they are proposing.

The CHAIR — I should just say by way of confidentiality agreements, you are not bound by that here in the sense that any proceedings of Parliament, under the bill of rights, are protected from judicial review or anywhere else, so what you say here is protected. The other point that I want to make is just in the international context and Dr Bell's work. After some privatisations, and I use that word in distinction to what is being proposed here, title insurance became commonplace in some jurisdictions. Is that a risk here?

Mr CHAMPION — Scott, do you want to comment on that?

Mr JUKES — The answer is it is always a risk, and in fact even with no change to the current system it is a risk. Spruikers of title insurance have been around for a while and continued to spruik.

The CHAIR — But it became commonplace in some of the other jurisdictions where major transactions could not or would not occur until the parties to those transactions had relevant insurance.

Mr JUKES — It became an essential requirement because of the changes to the way that the system had altered and guaranteed its dealing process.

The CHAIR — And that would add significant cost to every transaction.

Mr JUKES — I am not sure. I would imagine it would add a cost. My view is that the costs will increase in proportion to the degradation, if any, of the transactions. At the moment we have a very secure system. We have a boundary system which links in with it, which delivers good confidence, I believe, and efficient ways of realising what your title and the rights mean on the ground. If you removed the maintenance regimes for those or if you altered them in a way that affected them —

The CHAIR — Or weakened them.

Mr JUKES — or weakened them, then for the next 10 years or so perhaps you would not notice too many changes because the current structure is so strong. But bit by bit elements will fall away, maintenance will fall away, and all of a sudden in 10 years there will be an expensive issue leading to perhaps court cases, consternation if nothing else —

The CHAIR — Consequent.

Mr JUKES — The consequences will be that the cost therefore of doing business and the risk assessments that insurers or underwriters of title insurance provide have changed. So if their risk profile changes, then no doubt the fees will need to alter as well.

Dr RATNAM — Can I ask just one question on that?

The CHAIR — Yes, sure.

Dr RATNAM — You raised before the kind of proportion of data breaches and other interruptions in the system. You were referencing that in your printed submission, saying that it is not about the statistical significance but the raw impact of it that should also be measured. With those potential risks, do you think there is any way that it can be managed with the commercialisation proceeding this way? With all that data proposed to be commercialised, do you think there is a way that can be managed?

Mr JUKES — I think it is very important that the issue is addressed and that appropriate mechanisms are put in place to ensure that the confidence in the system is maintained.

Mr CHAMPION — Yes, because the system is more than what is being commercialised here.

Dr RATNAM — That is right.

Mr CHAMPION — There is broader interaction of the system. There are a lot of peripheral users — the systems and other stakeholders that all draw on that system. Currently there is no distinction between that; it is all public. We are now creating a divide and even now there is a connection there which has not been accounted for before, and so it is not just the internal impact of what is happening to registration — we need to look at the broader interaction with the system from everyone around it.

Dr RATNAM — I think that is a really important point in terms of narrating what confidence actually is, what confidence in our system is that actually ensures that the risk at the moment is relatively going to the point that we do not need title insurance as a mainstay but that confidence is actually built by various blocks of this whole system working together and the interactions and the expertise that flow between different departments and different parts of the system. That is actually the confidence that has been built over many, many years. It has built the integrity of the system, which raises a number of questions when one of those aspects starts to change because of the interaction.

Mr JUKES — We have considered a number of options for possible mechanisms or objectives that need to be considered. We are eager to talk to Treasury about those things as soon as the discussions proceed.

Dr RATNAM — Can I ask one further question in terms of your previous statement? I respect and accept that you are not able to form a view as yet given that you do not have all the information before you in terms of the shape of this commercialisation. In terms of your counterparts in other states where it has occurred, what has been their final view prior to the commercialisation of those services?

Mr CHAMPION — Probably our closest dealing has been with New South Wales. I believe the view at the moment is that it is a bit too early to tell what the impact is. However, I will say with our consultation with the Registrar-General's office there and their cadastral integrity unit, six months prior to the commercialisation up there they were feeling like they had suitable KPIs in place and that it should be business as usual. At six months after that they were starting to be concerned about quality. They realised that perhaps there were not enough quality KPIs involved in that, and also their own expertise within the regulator side. There were a lot of KPIs put on training and expertise within the operator, but maybe they had not considered the regulator up there and how they were going to maintain staff to audit the operator.

Dr RATNAM — Thank you. That is very helpful to me.

The CHAIR — I had another question on PEXA. We have obviously got a 1 October date and some recent concern has come to light about the end-to-end processes. Do you share some of those concerns over electronic transactions?

Mr CHAMPION — I do not want to have that issue mixed up with the commercialisation. I think it is a slightly separate issue, but there are broader concepts —

The CHAIR — It is a parallel process that is occurring.

Mr CHAMPION — It is a parallel process, but there is a good point that Scott made about highlighting the issue and it goes to our other comments about the broader interfacing with the systems. When we go to these new technologies and implement these systems, if we constrain the scope to the system but do not consider how the interactions work, we potentially have problems like we saw with the PEXA example the other week. So perhaps in that rollout there was not a broader understanding of the different people and how they have now got to interact with that system to ensure that the data is secure in those processes and we can have confidence in it.

The CHAIR — Can we thank you. We may well come back to your organisation. I certainly regard the role of your body and surveyors in general as central to this process. If we in any way diminish the authority and ability of surveyors to make decisions here and particularly the Surveyor-General, I think we may end up with a poorer system, so I am very conscious of that.

Dr RATNAM — Thank you very much.

Witnesses withdrew.