

29 January 2016

Financial Markets Policy
Ministry of Business Innovation and Employment
PO Box 3705
Wellington
NEW ZEALAND

*Review of the Financial Advisers Act 2008 and the Financial Service Providers
(Registration and Dispute Resolution) Act 2008*

KEY POINTS

- Option 5 and 6 potentially impact searches of the Register, impeding providers of employment screening services.
- Should there be changes to availability and access for searches, it is critical private sector users, such as employment screening services, be explicitly recognised as authorised users.

BACKGROUND

Veda is a data analytics company, best known for consumer credit reporting and also a leading provider of on-line due diligence services, including employment screening.

We note Part 3 of the Options paper for the Review of the Financial Advisers Act 2008 and the Financial Service Providers (Registration and Dispute Resolution) Act 2008 [‘options paper’] relating to misuse of the Financial Service Providers Register [FSPR].

As the holder of consumer credit data on behalf of New Zealanders, Veda appreciates that integrity of register information is critical to trust and confidence. As the provider of due diligence services, we are reliant on information held on Government-run registers, including the Financial Service Providers Register. Veda typically uses the FSPR when verifying the claimed bona fides of job applicants in the financial services sector, conducting this search alongside others, such as criminal history record, where Veda is an accredited agency with the Ministry of Justice.

In regard to options proposed in part 3, Veda would be concerned if the capacity to search or verify information on the FSPR was to become restricted. This is particularly the case with elements suggested in option 5 (*limit public access to all or parts of the FSP Register*) and option 6 (*convert the current FSP Register into a non-public notification list*) whereby availability of the register would be curtailed. For employment screening providers, the availability of the register to check online and in real time is critical to efficient business hiring processes.

As such, we recommend in the event searching of the register is to be amended, that Government enable authorised users (in addition to regulators and policy-makers) to continue to have access.

We are happy to provide further information to assist with deliberations.

Yours sincerely

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