

The Hon. Clare O'Neil MP
Minister for Home Affairs
Minister for Cyber Security

Dear Minister,

Thank you for the opportunity to make a submission on the development of the 2023-2030 Australian Cyber Security Strategy (the Strategy).

PEXA Group Limited (PEXA) welcomes the Government's cyber security policy and initiatives under the four key areas of a secure economy, a secure and resilient critical infrastructure, a sovereign and assured capability to counter cyber threats, and ensuring Australia is a trusted and influential global cyber leader. In this context PEXA would welcome further consultation on the role PEXA can play to significantly uplift Small to Medium Enterprises (SMEs) and continue work across the financial sector to enhance resilience in property transactions.

About PEXA

Arising from an initiative of the Council of Australian Governments (COAG), PEXA developed a world-first digital property exchange that enables its members to lodge documents with Land Registries and complete financial settlements electronically. Robust, secure, and fast, our platform is trusted by more than 10,000 legal and conveyancing firms and 160 financial institutions and underpinned by a culture of innovation, collaboration, and momentum.

Today, we process over 85% of Australian property sales and settlements, and over 95% of mortgage refinance transactions. In 2021, around \$688.7B of property settlements were processed by us, equivalent to around 1/3rd of Australia's GDP.

The platform and framework under which PEXA operates, was created in collaboration with enterprising individuals from the government, banking, legal and conveyancing communities to ensure PEXA meets the needs of various stakeholders, from lenders to homeowners. Through PEXA's collaborative engagement with stakeholders and our continuous improvement processes, approximately 87% of our platform enhancements are based on stakeholder feedback and collaboration.

While the establishment of digital property settlement, enabled by PEXA, was a significant COAG-led reform, it has been just one force that is re-shaping Australia's property market. Of note, digitalisation has increased along the property value chain with COVID-19 further accelerating this trend.

Uplifting SMEs and working in collaboration across the financial sector

PEXA plays an essential role in both outreach and uplift for over 10,000 legal conveyancing firms who are trusted partners in the property market for commercial and residential customers. In collaboration with Law & Cyber Pty Ltd, PEXA has been organising roundtables, webinars, and e-learning courses to empower the conveyancing sector and Land Registries with the knowledge and skills necessary to safeguard their businesses and their customers' data.

Recognising the SME sector's critical importance to the government, PEXA aims to play an integral part in the new cyber security strategy goal of making Australia the most secure nation by 2030. With the government's support and endorsement of PEXA's role, and working in conjunction with Law & Cyber's platform, we can continue to elevate cyber security awareness, driving tangible behavioural changes and fostering resilience within these 10,000 businesses. A key aspect of this initiative involves implementing a CPD program featuring education sessions with conveyancers addressing various pertinent cyber security topics, as well as a Cyber Audit Program. This program consists of three broad categories:

- Cyber Trust Score (CTS), where PEXA may assess the security of conveyancers.
- CTS + Education.
- CTS + Education and Cyber Audit capability.

PEXA welcomes further collaboration with the Government to fortify the resilience of this vital sector, which not only underpins the economy, but also comprises 10,000 SMEs.

Data minimisation

In the past six months, Australians have witnessed several devastating cyber security data breaches involving some of the country's biggest brands. These breaches led to the exposure of millions of personal identity documents and prompted certain government agencies to reissue identity documents, such as passports and driver licences. While it is crucial for businesses in Australia to perform customer identity verification, there is a pressing need for a government-backed central identity platform. Such a platform would allow businesses to integrate and verify the identity of citizens without requiring Australian businesses to collect and store personal identity documents like passports or driver licenses.

A government-backed, opt-in platform would unlock additional value in the Australian economy and eliminate the need for some businesses to request and retain sensitive identity documents. PEXA wholeheartedly supports the Government in pursuing this initiative.

Cross Sector Exercises

As PEXA serves as a critical component of the Australian economy concerning property transactions and collaborates with 160 financial institutions, there are ample opportunities for PEXA to participate in both sector-specific and cross-sector industry exercises. By bringing together experts, testing, and learning additional strategies, PEXA can contribute to enhancing sector resilience. In doing so, PEXA will help strengthen the overall cyber security posture of the property and financial sectors, ultimately benefiting the Australian economy.

Threat Intelligence Sharing

PEXA runs an inhouse Security Operations Centre (SOC) that is integrated with the Australian Cyber Security Centre (ACSC) and other private providers of threat intelligence services. As such we collect valuable threat intelligence on scams and other threat actors targeting the industry. This can include indicators of compromise (IOCs) relating to IP addresses, fraudulent bank accounts and other tactics and techniques leveraged by those seeking to disrupt settlements and the networks used to facilitate them.

We believe that the broader collaborating and sharing of this intelligence can play a critical role in strengthening the overall industry resilience to cyber threats and facilitate a culture of shared accountability that crosses government and competitive boundaries.

Cyber security leadership

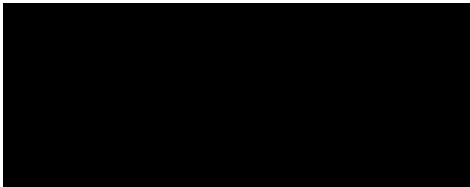
Society and governments are rapidly transitioning to digitised services and data sharing to reduce friction points for consumers, ensure open competition, stimulate innovation, and drive the digital economy. However, this shift also brings with it the risk of exploitation by criminal organisations or hostile foreign governments.

Last year, PEXA partnered with the peak body for Cyber Security, the Australian Information Security Association (AISA), to jointly support the conveyancer community's participation in the Australian Cyber Conference. This collaboration facilitated the exchange of ideas and the sharing of knowledge. PEXA plans to expand this effort by creating SME-focused cyber security streams for the conveyancer community and welcomes the opportunity to partner with the Government to amplify the coverage and reach.

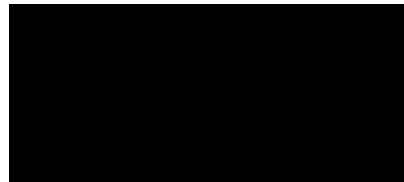
PEXA believes that the Australian property sector, due to its economic importance, is an ideal sector to initially focus on for targeted cyber security uplift involving more than 10,000 SMEs, while also showcasing sustainable quick wins at minimal cost to the government.

We would be pleased to address any questions you or your office may have about the property sector and how we can work together to build cyber security resilience. We would also welcome our involvement in the development of the cyber security strategy focused on Critical Infrastructure and the establishment of a trust mark or score for the conveyancing sector.

Yours sincerely



Scott Butterworth
Chief Growth Officer



David Willett
Chief Information Security Officer