

Software@Scale – Summary of Submission

Senate Economics References Committee Inquiry into Micro-Competition Opportunities

Context

Electronic conveyancing is central to land title transfer and property settlement in Australia. Since its introduction in 2013, the ecosystem has largely operated through a single operator. This raises resilience considerations: if one operator experiences disruption, settlements nationwide could be affected.

Our Position

Our submission concludes that cybersecurity and resilience are enhanced in a competitive multi-ELNO environment, provided all operators are governed under consistent security standards. This conclusion is supported by Australian precedents, established security frameworks (APRA CPS 234, ISO 27001, ASD Essential Eight), and proven principles of system design.

Key Points

- **Redundancy and fail-over**
Interoperability enables continuity: if one operator is unavailable, transactions can be redirected through another, reducing systemic outage risk.
- **Diversity as protection**
Different operators using different technology stacks limit correlated failures. A single flaw cannot compromise the entire ecosystem.
- **Competition and assurance**
In competitive environments, providers are incentivised to invest in stronger assurance, adopt certifications, and bring forward security innovations. Minimum regulatory baselines are complemented by market-driven improvement.
- **Proven Australian examples**
Programs such as the Consumer Data Right, Standard Business Reporting, and the NBN wholesale-retail model show that multi-party ecosystems can operate securely and reliably at national scale.

Conclusion

Interoperability, supported by clear governance, uniform standards, and collaborative oversight, makes Australia's e-Conveyancing market more secure, resilient, and innovative than reliance on a single-operator model.