

Model Operating Requirements (MOR) Consultation Draft 8 – Explanatory Notes

This table outlines the key proposed amendments in Consultation Draft 8 of the MOR published in May 2026.

IMPORTANT NOTE:

ARNECC has released Consultation Draft 8 of the MOR to obtain stakeholder feedback as early as possible in the drafting process. This decision will provide ARNECC with time to review and take on board stakeholder feedback prior to the anticipated start date for Version 8 of the MOR in May 2026.

ARNECC welcomes stakeholder feedback on the Consultation Draft 8 of the MOR.

#	Rule	Amendments	Explanatory Notes
MOR 2.1 – Definitions			
1.	ADI	Added new definition.	Added “ADI (authorised deposit-taking institution) has the meaning given to it in the Banking Act 1959 (Cth).”
2.	Approved Insurer	Amended definition to: Approved Insurer means: a general insurer within the meaning of the Insurance Act.; or a Lloyd’s underwriter within the meaning of the Insurance Act and to which section 93 of the Insurance Act continues to have effect; or a person to whom a determination is in force under section 7(1) of the Insurance Act that sections 9(1) or 10(1) or 10(2) of the Insurance Act do not apply.	Added Lloyd’s Underwriter and Section 7(1) section, definition now goes beyond a general insurer under the Insurance Act.
3.	Business Rules	Amended definition to include presentation for Lodgement or providing of electronic Registry Instruments, Information Reports and other electronic Documents or information with or to a Land Registry provided by the Land Registry.	Added to account for information provided by the Land Registry not just the Registrar.
4.	Certificate Policy	Amended to include such other competent PKI accreditation authority as is approved by the Registrar in writing.	Amendment to allow continued compliance with general technological requirements for public key infrastructure and digital certificates if Gatekeeper ceases to be a viable PKI while ARNECC continues to investigate appropriate alternatives.
5.	Certification Authority	Amended to include such other PKI service provider as is approved by the Registrar in writing.	Amendment to allow continued compliance with general technological requirements for public key infrastructure and digital certificates if Gatekeeper ceases to be a viable PKI while ARNECC continues to investigate appropriate alternatives.
6.	Change Management Framework	Amended to remove ‘comprehensive’ from definition.	To remove superfluous language.
7.	Client	Amended definition to:	Alignment with Model Participation Rules v8.

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		<p>Client means a Person who has, or Persons who have, appointed a Subscriber as their Representative pursuant to a Client Authorisation.</p> <p>Definition removes inclusion of caveators and applicants in relation to Priority Notices.</p>	
8.	Incident Response Plan	Amended definition to add “or playbooks tailored to address the specific cyber threats and risks to ELNOs.”	Incident response instructions can be set out in a plan or ‘playbook.’ It is cyber security best practice to have a set of incident response plans or playbooks that address threats prevalent to a specific organisation and industry. Such threats to ELNOs and the eConveyancing ecosystem can include the threat of ransomware, business email compromise, and data breach.
9.	Independent Certification	<p>Amended definition to:</p> <p>Add a requirement that certifications assess and provide all information required under the Operating Rules to which a certification relates, without limitation.</p> <p>Add “able to be relied on” to (d) such that the certification is: “(d) given for the benefit, and able to be relied on by, the Registrar”.</p> <p>Add the requirement that the Report provided by the Independent Expert must “includ[e] without limitation any Essential Recommendations” and in addition that the “Registrar is not required to examine the report to be able to rely on the Independent Certification as demonstrating compliance with the relevant Operating Requirement for which the Independent Certification is made”.</p>	To provide clarity on the documentation required to support Independent Certification; and to explain that Registrar’s may not examine reports.
10.	Independent Expert	<p>Amended definition to add:</p> <p>Reference to Body Corporate replacing Person.</p> <p>Inclusion of Independent Expert being capable of assessing and providing all the information required under these Operation Requirements to which a certification relates, without limitation.</p>	<p>Addresses issue of focus on individual person as independent expert rather than the organisation which provides their capacity.</p> <p>Addresses issue of some reports including disclaimers which limit the scope of the certification provided.</p>
11.	Insurance Act	Added new definition, meaning Insurance Act 1973 (Cth).	Clarity in definition and reference.
12.	Jeopardised Conveyancing Transaction	Amended definition to add “Conveyancing Transaction” to “Jeopardise”.	Consistency with Model Participation Rules v8.

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13.	Logs	Definition was deleted.	Deleted and replaced with 'System Logs' for greater clarity.
14.	National Credit Code	Amended definition to expand NCCP Act to full title of National Consumer Credit Protection Act 2009 (Cth).	Clarity in definition.
15.	NECDS Ltd	Added new definition	Describes NECDS Ltd as: "the National Electronic Conveyancing Data Standard Limited or its successor".
16.	Partial Suspension	Added new definition.	Amendment to align with amendments made to Model Participation Rules regarding consequences of Suspension Events for Subscribers.
17.	Personal Information	Amended definition to include reference to "any State or Territory privacy legislation".	Expand beyond Commonwealth privacy legislation.
18.	PKI (Public Key Infrastructure)	Amended to clarify that PKI refers to technology, policies and procedures based on public key cryptography not limited to Gatekeeper.	Amendment to allow continued compliance with general technological requirements for public key infrastructure and digital certificates if Gatekeeper ceases to be a viable PKI while ARNECC continues to investigate appropriate alternatives.
19.	Self-Certification	Amended definition	Amended definition to add requirements that the Self Certification be: (c) signed by Officer of the ELNO or potential ELNO (d) is on the letterhead of the ELNO or potential ELNO (e) is given for the benefit of and able to be relied on by the Registrar (f) annexes any documents required to be produced ... Registrar not required to examine to rely on... [main change not required to examine]
20.	Standard	Amended definition	Amended to account for standards changing "as amended from time to time".
21.	State	Definition moved.	Definition unchanged but relocated to be in alphabetical order.
22.	Subscriber Registration Process	Amended to include Partial Suspension.	Amendment to align with amendments made to Model Participation Rules regarding consequences of Suspension Events for Subscribers.
23.	Supplier	Amended definition	Amended to include NECDS Ltd as not a supplier.
24.	System Logs	Added new definition.	Defines System Logs as all records generated, collected, stored, or maintained by or on behalf of the ELNO in relation to the operation, security, and performance of the ELNO System.
MOR 2.2 – Interpretation			
25.	2.2.14	Added an interpretation clause noting that expressions like 'such as', 'includes', 'including', 'for example', 'particularly' are not words of limitation.	Included for clarity of drafting.
26.	2.2.15	Added an interpretation clause noting that where legislation in any Jurisdiction in which the ELNO operates, a Standard (as defined) or guidelines referenced in the Operating Requirements requires compliance or imposes an obligation on the same or similar subject matter, the ELNO must comply with the higher obligation.	To provide clarity as to the order of priority for potentially competing or overlapping obligations. This is to apply regardless of whether the higher obligation or standard is included in any plan of the ELNO, including any plan referred to in the Operating Requirements.

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27.	2.2.16	Added an interpretation clause noting that where the Registrar’s approval was required under the Operating Requirements, that the approval may be given or withheld ‘at the Registrar’s discretion’	Amended to provide further clarification that the Registrar’s approval could be given at the Registrar’s discretion. Also included to differentiate the difference between the Registrar’s Approval of an ELNO to operate, and where approval by the Registrar is required or referred to in the Operating Requirements.
MOR 4.3 – Character			
28.	4.3.1(a)(i); 4.3.1(b)(i)	Amended the drafting to ensure that ELNOs were of a good character and had not faced an Insolvency Event in the last 5 years.	Amendments were made to the Insolvency Event Operating Requirements to align with the Participation Rules and clarify that it must have been 5 years since an Insolvency Event ended.
MOR 4.4, 4.5 and 4.6 – Financial resources, Technical resources, and Organisational resources			
29.	4.6	Amended to clarify that the organisational resources must be commensurate with the size and extent of the ELNO’s business and assets and the size and extent of known or potential information and cyber security vulnerabilities and threats.	Amendment to align with continuous improvement requirements and ensure that the organisational resources of the ELNO are reasonable and appropriate for the size and complexity of the organization.
30.	4.4.2, 4.5.2, and 4.6.2	Amended to specify that the “ <i>ELNO is to have its financial resources reviewed by an Independent Expert at least annually to assess the ELNO’s compliance with Operating Requirement 4.4.2.</i> ” Amended to specify that the “ <i>ELNO is to have its technical resources reviewed by an Independent Expert at least annually to assess the ELNO’s compliance with Operating Requirement 4.5.2.</i> ” Amended to specify that the “ <i>ELNO is to have its organisational resources reviewed by an Independent Expert at least annually to assess the ELNO’s compliance with Operating Requirement 4.6.2.</i> ”	Amendment for clarification. The Requirements of the Independent Expert are more appropriately addressed in the body of the MOR rather than in Schedule 3. The reporting requirements have been summarized in Schedule 3.
MOR 4.7 – Insurance			
31.	4.7.2 and 4.7.8	Added new minimum requirements for ELNO insurance policies and further specifics.	Amendment following insurance expert recommendation to ARNECC. ELNOs will now be required to hold policies that specifically cover: <ul style="list-style-type: none"> • the ELNO as an insured entity • any claim resulting from a cyber incident • the acts and omissions of its principals, Officers and employees • any dishonest, fraudulent, criminal or malicious acts or omissions by an employee or director • cyber response for enterprise risks including incident response, business interruption and data recovery and system recover ELNOs will also be required to hold any policy that the ELNO considers reasonably necessary to ensure it has relevant insurance to an

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			<p>appropriate level for first and third party risks associated with operating as an ELNO, including relating to a cyber incident.</p> <p>The ELNO may hold a combined policy for certain insurances provided it otherwise complies with the Operating Requirements.</p>
32.	4.7.7	Added new requirement to inform the Registrar in writing as soon as practicable of any material change to any insurance coverage required under the Operating Requirements.	<p>Amendment following insurance expert recommendation to ARNECC.</p> <p>The Registrar should be made aware in writing if there is any material change to the insurance coverage of an ELNO.</p>
33.	4.7.9 & 4.7.10	Added new requirement that any insurance provided on a 'claims made basis' has a retroactive date prior to the effective date and permit reporting of claims for six years after expiry, revocation or surrender of the ELNO's Approval, and the obligations under Operating Requirement 4.7 continue for that period.	<p>Amendment following insurance expert recommendation to ARNECC.</p> <p>Insurances should cover all relevant periods and allow for reporting of claims after the ELNO's Approval ends.</p>
MOR 5.3 – General Obligations			
34.	5.3(m) and 5.3(n)	Split Operating Requirement 5.3(m) into two distinct Operating Requirements.	<ul style="list-style-type: none"> - Amendment for clarification that an ELNO is required to be a Code Operator Member even if the Code has not yet taken effect.
35.	5.3(o)	Added requirement for ELNOs not to outsource any part of the ELNO System which stores or Processes Land Information unless approved by the Registrar.	<p>Included to ensure</p> <ul style="list-style-type: none"> - ELNO's are adhering with their general requirements under the Operating Requirements including for example 7.5 and 19.1 and taking sufficient measures to protect the use of Land Information, and <p>if ELNOs are outsourcing any part of the ELNO System, that the ELNO has sufficient confirmation that Contractors or Suppliers are adhering as well.</p>
MOR 5.6 – Separation			
36.	5.6.3(d)	Amended to specify that the ELNO is to <i>'have its Separation Plan reviewed by an Independent Expert at least annually to assess the ELNO's compliance with Operating Requirement 5.6.3(c).'</i>	<p>Amendment for clarification.</p> <p>The Requirements of the Independent Expert are more appropriately addressed in the body of the MOR rather than in Schedule 3. The reporting requirements have been summarized in Schedule 3.</p>
MOR 7.1 – Information Security Management System			
37.	7.1(a)	Amended to clarify the ISMS should be regularly reviewed to ensure the technical and organisational security of the ELN.	Amended to clarify expectations of what the ISMS is to cover and secure.
38.	7.1(b)(i)	Added "7.5" (Protection of Land Information) to the list of Operating Requirement obligations that the ELNO's Information Security Management System must take into account.	It is an important consideration for the ELNO's Information Security Management System that any computer infrastructure forming part of the ELNO System, and in which Land Information is entered, stored or processed, be located within the Commonwealth of Australia.
39.	7.1(b)(ii)(E)(a)	Added "including protection against phishing emails".	Amendment to highlight the importance of protection against phishing emails, being a prevalent cyber threat and deceptive technique to steal personal information, funds or credentials.

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40.	7.1(b)(ii)(E)(d)	Added "which must be reviewed and tested at least annually." and includes 'Playbooks' as referenced in the new Definitions (see #4)	See above amendment to the definition of "Incident Response Plan." It is cyber security best practice for incident response plans or playbooks to be reviewed and tested at least annually.
41.	7.1(b)(iii)	New requirement that the ELNO's Information Security Management System include formalised controls and defined metrics for mitigating risks specific to ELNOs.	Addition for clarification.
42.	7.1(c)	Amended to specify that the ELNO's Information Security Management System must be regularly reviewed by an Independent Expert "at least annually to assess the ELNO's compliance with Operating Requirement 7.1."	Amendment for clarification.
43.	7.1(e)	Added a new Operating Requirement 7.1(e) requiring ELNOs to provide a Self Certification that the ELNO has actively monitored and responded to emerging information and cyber security threats.	To provide the Registrar with confidence that ELNOs are responding appropriately to identified cyber security threats.
44.	7.1(f)	Added a new Operating Requirement 7.1(f) requiring ELNOs to maintain an Information Security Management System that is certified against and complies with the ISO 27001 Standard (as amended) or other Standard approved by the Registrar in writing.	Amendment following security expert recommendations to ARNECC. In addition to existing requirements, amendment to also require that an ELNO's Information Security Management System be certified against the established and internationally recognised cyber security industry best practice Standard ISO27001. This will provide a standardised and holistic way to assess the maturity of an ELNO's Information Security Management System.
45.	7.1(g)	Added a new Operating Requirement 7.1(g) requiring ELNOs to promptly make any changes to the Information Security Management System when requested by the Registrar following good faith consultation between the Registrar and the ELNO.	To ensure any concerns the Registrar has regarding cyber security and protective measures for the ELN are able to be appropriately addressed.
MOR 7.2 – Access to ELN			
46.	7.2.5(a)	Added a new Operating Requirement 7.2.5(a) to require the ELNO to obtain a police background check for Personnel (as defined) prior to granting access to the ELNO System.	Amendment following security expert recommendations to ARNECC. Any Subscriber User or future potential User of the ELNO System should have a police background check conducted prior to usage of the platform.
47.	7.2.5(b)	Added a new Operating Requirement 7.2.5(b) to require the ELNO to adopt and enforce access controls for Personnel to access the ELNO System and any system that connects to the ELNO System that are certified against and comply with ISO 27001.	Amendment to align with amendments to Operating Requirement 7.1 requiring the Information Security Management System to comply with the ISO 27001 Standard and clarify appropriate access controls is a security requirement of particular concern.
48.	7.2.5(c)	Amended to include a requirement for the ELNO to ensure its Personnel are aware of and complying with the ELNOs security obligations, complete mandatory security awareness training, receive regular security awareness communications and updates from the ELNO and complete phishing exercises at least quarterly.	To provide the Registrar with confidence that an ELNO takes a holistic approach to cyber security and adopts processes and procedures to encourage a culture of cyber awareness.
49.	7.2.6	Added a requirement for the ELNO to provide, maintain and	To provide transparency and accurate records.

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		preserve accurate System Logs for a minimum of six months from the session creation, and provide the same to the Registrar within ten Business Days of a written request.	
MOR 7.3 – Security of ELN			
50.	7.3.1(a)	Amended to include requirement for the ELNO to ensure that the data is protected from misuse, interference and loss, from unauthorised access, modification and disclosure.	Amendment to ensure that data is not only protected from corruption or technological compromise but also protected from User compromise through misuse or unauthorised access.
51.	7.3.1(a), 7.3.1(b) and 7.3.1(c)	Moved the requirement for the ELNO to take reasonable steps from 7.3.1 to applicable clauses.	To provide clarity in drafting.
52.	7.3.1(c)	Amended to include that the ELNO must use firewalls.	Amendment to clarify that the ELNO must use firewalls as one of the measures to prevent unauthorized system use, intrusion and service denial.
53.	7.3.1(e)	Amended to require the ELNO to do all things necessary to increase resiliency of the ELN against Security Incidents.	Amendment to clarify that in reducing systemic risk in its ELN, the ELNO is expected to increase the resiliency of the ELN against Security Incidents.
54.	7.3.1(g)	Amended to require the ELNO to do all things necessary to ensure Suppliers are subject to and comply with security risk assessments and the ELNO’s Information Security Management System, and to ensure Suppliers no longer have access to any ELNO systems, facilities or Data upon termination of the relationship.	Amendment to clarify expectations for ELNOs when undertaking cyber security due diligence prior to engaging any Supplier and for the duration of the engagement.
55.	7.3.1(k)	Added a new requirement for ELNOs to use data centres that comply with Class 3 in the ISO Standard 22237.	Amendment to clarify appropriate security measures to ensure the security of the ELN.
56.	7.3.1(l)	Added a requirement for the ELNO to “ensure all virtual machines are abstracted from the shared underlying physical infrastructure to minimise the Risk to a virtual machine if any underlying hardware components are damaged”.	Amendment to clarify appropriate security measures to ensure the security of the ELN.
57.	7.3.1(m)	Added a requirement for ELNOs to implement and use an appropriate anti-malware solution.	Amendment to clarify appropriate security measures to ensure the security of the ELN.
58.	7.3.2(a)	Amended reference to ‘once a year’ to ‘annually’.	Amended for consistency with drafting.

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59.	7.3.3	Added a requirement for the ELNO to internally audit and test the security of the ELN and review the design and operating effectiveness of its procedures and controls in the ELNO’s Information Security Management System at least annually, and Promptly take all reasonable steps to implement all recommendations and improvements to remediate issues arising from those internal audits and testing.	Amended to require the security of the ELN is regularly tested and any issues identified are acted upon appropriately to ensure the ongoing security of the ELN.
MOR 7.4 - Data			
60.	7.4.1(a) and 7.4.1(b)	Moved reference to ‘the ELN’ to applicable clauses.	To provide clarity in drafting.
61.	7.4.1(d)	Added requirement that all Data is to remain encrypted, while ‘at rest’ and in transit.	To clarify expectations of data security.
MOR 7.6 – Digital Certificate regime			
62.	7.6.2(a)(i) & 7.6.2(a)(ii)	Added ‘or such other PKI framework as is approved by the Registrar in writing’.	Amendment to allow continued compliance with general technological requirements for public key infrastructure and digital certificates if Gatekeeper ceases to be a viable PKI while ARNECC continues to investigate appropriate alternatives.
MOR 7.9 - Notification of Jeopardised Conveyancing Transactions			
	7.9	Added “Where to the ELNO’s knowledge, information or belief a Conveyancing Transaction is a Jeopardised Conveyancing Transaction...”, that the notification by the ELNO to the Registrar must be “to the extent permitted by law”, and that notification must be provided to Subscriber “involved in the Conveyancing Transaction.”	Amendments for clarification.
MOR 7.10 – Obligations in relation to Notification of Compromised Security Items			
63.	7.10(c) and 7.10(d)	Added a requirement that the ELNO must “ <i>immediately notify the Registrar</i> ” of a Comprised Security Item, even when it is or is not possible to prevent the presentation for Lodgment with the Registrar or Land Registry the relevant electronic Registry Instruments or other electronic Documents.	The Registrar should be notified of a Comprised Security Item whether or not it is possible to prevent the presentation for Lodgment.
MOR 7.12 – Cloud Service			
64.	7.12.1(e)(ii) & 7.12.1(e)(iii) & 7.12.1(e)(iv)	Included ‘at least annually’ in 7.12.1(e)(iii) and amended reference to ‘once a year’ in 7.12.1(e)(ii) and 7.12.1(e)(iv) to ‘annually’.	Amended for consistency with drafting.
MOR 7.13 – Vulnerability assessment and penetration testing			
65.	7.13(a) and (b)	Amended to replace references to “independent security professional” with “Independent Expert”.	Amendments for consistency and to accompany a new requirement for ELNOs to obtain an annual Independent Certification demonstrating the ELNOs’ compliance with the requirements under MOR 7.13.

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66.	7.13(d)	Added a requirement for ELNOs to provide a copy of the vulnerability assessment and penetration testing report and all ELNO remediation plans and proposed changes to the Information Security Management System to the Registrar on request.	To provide transparency and visibility to the Registrar on request.
67.	7.13(e)	Added a requirement for ELNOs to undertake a cyber-Incident table-top exercise at least annually that is facilitated by an Independent Expert, with any Essential Recommendations to be appropriately actioned.	To provide for independent assessment through single party table-top exercises and ensure that any findings of those exercises are addressed in a timely manner.
MOR 7.14 – Joint Incident simulation exercises			
68.	7.14(a) and 7.14(b)	Added a requirement for ELNOs to participate cooperatively and Promptly in joint Incident table-top exercises with the Registrar and if applicable, the Land Registry and Revenue Office, no more than once every year when required by the Registrar.	To provide for multi-party simulations with Land Registry and Revenue Office facilitated by the ELNO or a facilitator and ensure that any findings of those exercises are addressed in a timely manner.
69.	7.14(c)	Added a requirement for the ELNO to either facilitate any Incident Simulation itself or provide a facilitator reasonably acceptable to the Registrar, at the ELNO’s own cost or as otherwise determined by the Registrar.	To provide for multi-party simulations but provide flexibility for the ELNO if they do not wish to facilitate.
70.	7.14(d)	Added a requirement for the ELNO to Promptly implement any rectification or remediation actions revealed in the results of the Incident Simulation, and report to the Registrar at a cadence and in a form requested by the Registrar.	To ensure the benefits of the multi-party simulations are realised.
MOR 8 – Security and Integrity of the Titles Register			
71.	8.1.2	Added a requirement for the ELNO to provide a report to the Registrar on a quarterly basis identifying if any of the events noted in requirements (i) to (vii) occurred during the reporting period.	To ensure the ELNO is proactively monitoring and responding to security areas of concern.
MOR 9 – Risk Management			
72.	9.1(b)	Amended to specify that the Independent Expert is to “ <i>assess the ELNO’s compliance with Operating Requirement 9.1(a).</i> ” at least annually.	Amendment for clarification. The Requirements of the Independent Expert are more appropriately addressed in the body of the MOR and summarised at reporting Schedule 3.
MOR 10 – Minimum System Requirements			
73.	10.1.2	Added a requirement that the ELNO must have its ELN reviewed by an Independent Expert at least annually to assess the ELNO’s compliance with OR 10.1.1 and implement, at a minimum, any Essential Recommendations of that Independent Expert.	An annual review is critical for ensuring that the infrastructure of the ELN remains secure, efficient and aligned with evolving business and compliance requirements. This change aligns with the requirements for other MORs that are similar in nature.

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MOR 12 – Business Continuity and Disaster Recovery Management			
74.	12.1(a) and 12.1(b) and 12.2	Moved clause 12.2 to clause 12.1(b) and deleted clause 12.2. Amended the frequency of the requirement to review from ‘regularly’ to ‘at least annually’ in 12.1(a).	Amendment following security expert recommendations to ARNECC and to align drafting with similar drafting elsewhere within the MORs for consistency. An annual review ensures that the ELNO’s BCDR Programs are up-to-date and appropriately tested, which can increase its effectiveness and the assurance it provides.
MOR 13.1 – Change Management Framework			
75.	13.1.2	Added requirement that the ELNO must have its Change Management Framework reviewed by an Independent Expert at least annually and implement, at a minimum, any Essential Recommendations of that Independent Expert.	An annual review is critical for ensuring that the Change Management Framework remains effective, compliant, and aligned with evolving strategic goals. This change aligns with the requirements for other MORs that are similar in nature.
MOR 14 – Subscribers			
76.	14.3	Amended requirement to ensure the register applies to Users as well as Subscribers. Added requirement to provide the Registrar with details of why a Subscriber’s or User’s registration expired or was restricted, suspended, terminated or otherwise ended.	To support amendments to MOR 14.7.
77.	14.7(b), 14.7(c) and 14.7(e)	Amended requirements to incorporate Partial Suspensions.	Amendment to clarify.
78.	14.7(d)	Amended requirement to apply to Subscriber’s Users as well as Subscribers.	Amendment to clarify.
79.	14.7(f) and 14.7(g)	Clarified that an ELNO must Promptly notify another ELNO if it knows or suspects that a Subscriber or Subscriber’s User has committed, is committing or is about to commit a Suspension Event or Termination Event, and where the ELNO restricts, suspends or terminates a Subscriber or User, Promptly notifies any other ELNO of that restriction, suspension, termination or reinstatement.	While this could fit within a Subscriber ‘restriction’ in that a Subscriber’s User is banned from using an ELNO under MOR 14.9, including this amendment provides greater certainty. It allows a Registrar to inform other ELNOs of suspended or terminated Subscribers or Users, to reduce the likelihood of repeat non-compliance and guard against serious circumstances such as fiscal dishonesty and fraud.
41.	14.7(h)	Added a new Operating Requirement requiring an ELNO to assess compliance with the Subscriber security policy by Subscribers and Users, using a reasonable sample of the total number of Subscribers and Users for the Jurisdiction.	Amendment to provide assurance that Subscribers and Users are complying with the ELNO’s security policy, reducing the risk of Subscribers with poor security maturity gaining and maintaining access to the ELNs. As ELNOs are already required to maintain a Subscriber Review Process, it is considered appropriate for this new requirement to be addressed as part of that existing process.
80.	14.7(i)	Added requirement to provide the Registrar with an annual extract of the Subscribers and Users who have been restricted, suspended or terminated or otherwise ended for that year and when and why their registration was restricted, suspended or	An annual summary of Subscribers and Users restricted, suspended, terminated or otherwise ended will assist Registrars in cross-referencing Subscriber actions across jurisdictions for national consistency.

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		terminated or otherwise ended.	
81.	14.8 and 14.9	Added reference to Partial Suspension. See item 16.	Amendment to align with amendments made to Model Participation Rules regarding consequences of Suspension Events for Subscribers.
MOR 15 – Compliance Monitoring and Reporting			
82.	15.10.2	Added a requirement for ELNOs to provide updated documents and the circumstances and rationale for any material change to those documents on request.	Amendment to promote greater transparency of ELNO activities to the Registrar and allow improved oversight of ELNO activities.
MOR 16 – Independent Certification			
83.	16.1(b)	Amended requirement to ensure that the Registrar is provided with sufficient information regarding the qualifications, competence and insurance coverage ‘and scope’ of the proposed Independent Expert when seeking Approval of an Independent Expert.	Amendment to provide transparency as to the appropriateness of an Independent Expert and the matters to which they are intending to provide Independent Certification.
84.	16.1(c)	Added requirement for ELNO to ensure that an approved Independent Expert continues to meet the requirements of an Independent Expert after approval.	An ELNO should ensure that its chosen Independent Expert remains appropriately qualified, competent and insured after being approved as an Independent Expert.
85.	16.3(b) and 16.3(c)	Added requirement for Essential Recommendations to be implemented within a reasonable time approved by the Registrar in writing and that until implemented, the ELNO must provide a monthly report to the Registrar on the progress of implementation.	An ELNO should implement Essential Recommendations in a timely manner and keep the Registrar updated as to the progress of that implementation.
86.	16.4	Amended to specify the Essential Recommendations are those made by the Independent Expert under Operating Requirement 16.3(a).	Amendment to clarify that an Independent Expert’s Certification must include any Essential Recommendations made by that Independent Expert.
MOR 17 Compliance Examination			
87.	17	Amended to move ‘under the ECNL’ to read ‘...where the Registrar conducts a Compliance Examination under the ECNL...’.	Amendment to provide clarity.
MOR 19.1 – Retention			
88.	19.1.2	Amended to allow an ELNO to use appropriately secure methods to destroy or de-identify Personal Information (as defined) after the later of 15 years or the expiry of any relevant statutory period in any Jurisdiction the ELNO operates in.	Amendment following security expert recommendations to ARNECC. ELNOs will be permitted to destroy or de-identify Personal Information in certain circumstances after a certain time, but only where such destruction or de-identification is conducted in a secure manner and does not impact information required to be permanently retained by the ELNO.
89.	19.1.3	Added requirement for an ELNO to retain a backup of critical data and systems related to the ELN.	ELNOs should retain a secure back up of all data required to be retained under the Operating Requirements in case of a cyber incident.
90.	19.3	Amended to clarify that where an ELNO is required by law to use, reproduce or disclose any Land Information the ELNO must notify the Registrar in writing prior to using, reproducing or disclosing the information.	Amendment to allow ELNOs to comply with statutory obligations to reproduce or disclose Land Information without seeking Registrar approval, on condition that the Registrar is informed of any reproduction

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			or disclosure purported to be made in compliance with a statutory requirement prior to the reproduction or disclosure of the Land Information.
MOR 20.1 – Suspension or revocation of ELNO’s Approval			
91.	20.1(a)	Moved ‘if’ from each sub-clause to 20.1(a) and clarified that the Registrar may suspend or revoke an ELNO’s Approval if the ELNO fails, without reasonable excuse, to comply with a written direction of the Registrar given to the ELNO.	Amendment for clarity of drafting and to confirm that an ELNO is expected to comply with written directions from the Registrar unless there is a reasonable excuse not to.
SCHEDULE 1 - Insurance			
92.	1	Professional indemnity insurance has been split into two requirements; a minimum aggregate amount of \$20,000,000 and a Minimum claim amount of \$5,000,000.	Amendment following insurance expert recommendation to ARNECC. To provide clarity that insurance minimums relate to both individual claims and aggregate amounts.
93.	5.	Cyber response insurance of \$5,000,000 added.	Amendment following insurance expert recommendation to ARNECC. As a digital platform, it is good corporate governance to ensure the ELNO is sufficiently insured against cyber security loss.
SCHEDULE 3 – Reporting requirements			
94.	Category One	Added ‘corporate’ to Self-Certification column for 4.3.1.	Amendment to better align with substantive MOR requirements as amended and explained above.
95.	Category One	Deleted 4.3.1(a)	Amendment to better align with substantive MOR requirements as amended and explained above.
96.	Category One	Edited 4.3.1(b) to include ‘Principals, Officers’ and removed the capitalisation from employees.	Amendment to better align with substantive MOR requirements as amended and explained above.
97.	Category One	For Operating Requirement 4.3.2, amended ‘Self-Certification to be produced’ by adding ‘...arrangements Fit for Purpose’.	Amendment to better align with substantive MOR requirements as amended and explained above.
98.	Category One	Edited 4.4 to remove Self-Certification and require Independent Certification ‘compliance with the requirements’.	Amendment to better align with substantive MOR requirements as amended and explained above.
99.	Category One	Edited 4.5 to add ‘evidence of sufficient’ to Document to be produced column and remove Self-Certification and require Independent Certification ‘compliance with the requirements’.	Amendment to better align with substantive MOR requirements as amended and explained above.
100.	Category One	For Operating Requirement 4.6, amended ‘Document to be produced’ by replacing ‘Organisational structure’ with ‘Evidence of sufficient organizational resources and current organizational chart’.	Amendment to better align with the documents to be produced for MOR 4.5. ‘Organisational structure’ has generally been interpreted as an organisational chart, which does not adequately demonstrate ‘sufficient organisational resources to meet...obligations under these Operating Requirements’. As noted in the MORGN, the purpose of this requirement is to ensure an ELNO can sustain the operation of its ELNO System.

#	Rule	Amendments	Explanatory Notes
101.	Category One	For Operating Requirement 5.2, amended 'Document to be produced' by replacing 'Business Plan' with 'Implementation Plan'.	Amendment to better align with substantive MOR requirements as amended and explained above.
102.	Category Two	Added 'corporate' to Self-Certification to be provided column in 4.3.1.	Amendment to better align with substantive MOR requirements as amended and explained above.
103.	Category Two	Deleted 4.3.1(a)	Amendment to better align with substantive MOR requirements as amended and explained above.
104.	Category Two	Edited 4.3.1(b) to include 'Principals, Officers' and removed the capitalisation from employees.	Amendment to better align with substantive MOR requirements as amended and explained above.
105.	Category Two	Edited 4.4 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
106.	Category Two	Edited 4.5 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
107.	Category Two	Edited 4.6 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
108.	Category Two	Edited 4.7.1, 4.7.2 & 4.7.3 to require Self-Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
109.	Category Two	Edited 4.7.4 & 4.7.5 to remove reference to the ORs in the Self-Certification column, correcting the grammar to show Compliance with 'the' requirements'	For consistency.
110.	Category Two	Edited 5.1 Self-Certification column to include a requirement to produce a Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
111.	Category Two	Edited 5.2 Self-Certification column to include a requirement to produce a Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
112.	Category Two	Deleted 5.3(m) and moved it to the correct alpha numeric order.	For consistency.
113.	Category Two	Added OR 5.3(n) Industry Code for e-Conveyancing Payments and a Self-Certification requirement for compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
114.	Category Two	Edited 7.1 to update the subject line to Information Security Management System and edited the Document to be produced column to include Incident Response Plan(s) in addition to the ISMS. Independent Certification column updated to add 'compliance with the requirements' and a 'Current ISO 27001 Standard certification'.	Amendment to better align with substantive MOR requirements as amended and explained above. This change will require an ISMS to be compliant with a higher, internationally recognised, standard as well as continue to be Fit for Purpose.

#	Rule	Amendments	Explanatory Notes
		For Operating Requirement 7, amended 'Independent Certification to be obtained and supplied' by replacing 'ISMS Fit for Purpose' with 'Compliance with the current ISO 27001 Standard, and Operating Requirement 7.1(b)'.	Requiring the Independent Certification to also ensure compliance with MOR 7.1(b) will better align this item at Schedule 3, Category Two, with the requirement at MOR 7.1(b).
115.	Category Two	Added OR 7.2 Access to ELN, requiring a Self-Certification of 'compliance with the requirements' and an Independent Expert certification requiring production of 'current ISO 27001 Standard certification of access controls'.	Amendment to better align with substantive MOR requirements as amended and explained above. This change will require an ISMS to be compliant with a higher, internationally recognised, standard as well as continue to be Fit for Purpose.
116.	Category Two	Added OR 7.3.1 Security of ELN and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
117.	Category Two	Added OR 7.4 & 7.5 Data & Protection of Land Information and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
118.	Category Two	Added 7.6, 7.7 & 7.8 Digital Certificates & Digital Signing and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
119.	Category Two	Added 7.9 & 7.10 Jeopardised Conveyancing Transactions & Compromised Security Items and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
120.	Category Two	Added 7.11 Data Breach Notification and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
121.	Category Two	Edited OR 12 to show 12.1. For Operating Requirement 12.1, removed 'Fit for Purpose' and replaced with 'complied with the requirements'.	Amended to ensure the independent expert is certifying that ELNOs had have complied with all the requirements within 12.1, which includes the Fit for Purpose requirement as well as other requirements.
122.	Category Two	Edited OR 13 to show 13.1 and included requirement for an Independent Certification confirming compliance with the requirements. Replaced Operating Requirement reference '13' with '13.1', and under 'Independent Certification to be obtained and supplied' added 'Compliance with the requirements'.	Changes made for clarification. MOR 13.3 is a separate requirement relating to the implementation plan. The Change Management Framework should be subject to the independent certification regime, as is business continuity and disaster recovery under MOR 12. The standard of the Change Management Framework, and changes implemented by the ELNO, could have a significant impact on the ELNOs' operation and consequently the wider electronic conveyancing ecosystem and other market participants.
123.	Category Three	Added 'corporate' to the Self-Certification to be provided column in Operating Requirement 4.3.1.	Amendment to better align with substantive MOR requirements as amended and explained above.
124.	Category Three	Deleted 4.3.1(a)	Amendment to better align with substantive MOR requirements as amended and explained above.

#	Rule	Amendments	Explanatory Notes
125.	Category Three	Edited 4.3.1(b) to include 'Principals, Officers' and removed the capitalisation from employees.	For consistency.
126.	Category Three	Edited 4.4 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
127.	Category Three	Edited 4.5 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
128.	Category Three	Edited 4.6 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
129.	Category Three	Edited 4.7.1, 4.7.2 & 4.7.3 to require Self-Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
130.	Category Three	Edited 4.7.4 & 4.7.5 to remove reference to the ORs in the Self-Certification column, correcting the grammar to show Compliance with 'the' requirements'	Amendment to better align with substantive MOR requirements as amended and explained above.
131.	Category Three	Added 4.7.6 Insurance and Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
132.	Category Three	Edited 4.8 - 4.11 to remove reference to the ORs in the Self-Certification column, correcting the grammar to show Compliance with 'the requirements'	Amendment to better align with substantive MOR requirements as amended and explained above.
133.	Category Three	Edited 5.1 Self-Certification column to include a requirement to produce a new Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
134.	Category Three	Edited 5.2 Self-Certification column to include a requirement to produce a new Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
135.	Category Three	Deleted 5.3(m) and moved it to the correct alpha numeric order.	For consistency.
136.	Category Three	For Operating Requirement 5.3(g) added before policies the word 'government'.	Amendment to better align with substantive MOR requirements as amended and explained above.
137.	Category Three	Added OR 5.3(n) Industry Code for e-Conveyancing Payments and a Self-Certification requirement for compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
138.	Category Three	Edited 7.1 to update the subject line to Information Security Management System and added 'Current ISO 27001 Standard certification with audit report(s)' to the Document to be produced column. Self-Certification column amended to a requirement for 'compliance with the requirements'. Independent Certification column updated to add 'compliance with the requirements' and a 'Current ISO 27001 Standard certification'.	Amendment to better align with substantive MOR requirements as amended and explained above. This change will require an ISMS to be compliant with a higher, internationally recognised, standard as well as continue to be Fit for Purpose.

#	Rule	Amendments	Explanatory Notes
		For Operating Requirement 7, amended to require under Operating Requirement 7.1 a Current ISO 27001 Standard certification with audit report(s) and that the Independent Certification certify that the ISMS complies with the Operating Requirements.	
139.	Category Three	Added item Operating Requirement “7.2 – Access to ELN” requiring ELNO to produce a Self-Certification that it has “Complied with the requirements”.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
140.	Category Three	Added item Operating Requirement “7.3.1 - Security of the ELN” requiring the ELNO to produce a Self-Certification that it has “Complied with the requirements.”	New item to accompany amendments under Operating Requirement 7.3.1.
141.	Category Three	Added item Operating Requirement “7.4 & 7.5 – Data & Protection of Land Information” requiring ELNO to produce a Self-Certification that it has “Complied with the requirements”.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
142.	Category Three	Added item Operating Requirement “7.6, 7.7 & 7.8 – Digital Certificate Regime, Verifying Digital Signing & Verifying No Alteration” requiring ELNO to produce a Self-Certification that it has “Complied with the requirements”.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
143.	Category Three	Added item Operating Requirement “7.9 & 7.10 – Notification of Jeopardised Conveyancing Transactions & Obligations in relation to Notiication of Compromised Security Items” requiring ELNO to produce a Self-Certification that it has “Complied with the requirements”.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
144.	Category Three	Added item Operating Requirement “7.11 – Data Breach Notification” requiring ELNO to produce a Self-Certification that it has “Complied with the requirements”.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
145.	Category Three	For Operating Requirement 7.13, moved ‘Compliance with the requirements’ from under ‘Self-Certification to be provided’ to ‘Independent Certification to be produced’.	Amendment to better align with substantive MOR requirements as amended and explained above.
146.	Category Three	Edited Self-Certification column in OR 9.1 to remove reference to the RMF.	Amendment to better align with substantive MOR requirements as amended and explained above.
147.	Category Three	Edited 10.1(b) to replace ‘Adaptability’ with ‘Functionality’ in the Subject column, remove the Self-Certification requirement and edit the Independent Certification column to show ‘compliance with the requirements’.	Amendment to better align with substantive MOR requirements as amended and explained above.
148.	Category Three	For Operating Requirement 12.1, removed ‘Fit for Purpose’ and replaced with ‘complied with the requirements’.	Amended to ensure the independent expert is certifying that ELNOs had complied with all the requirements within 12.1, which includes the Fit for Purpose requirement as well as other requirements.
149.	Category Three	Edited OR 13 to show 13.1, removed requirement for a Self-Certification and included a requirement for an Independent	Amendment to better align with substantive MOR requirements as

#	Rule	Amendments	Explanatory Notes
		Certification confirming compliance with the requirements.	amended and explained above.
150.	Category Three	Added OR 13.2 Change management and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
151.	Category Three	For Operating Requirements 14.1, 14.2 and 14.3.1 and 14.3.2, created separate categories.	This change reduces confusion and lowers the risk of errors in the required wording. MOR 14.1-14.3 requires three separate self-certifications from the ELNO, however, in the Schedule 3 table, 14.1-14.3 was shown as one combined self-certification.
152.	Category Three	Added OR 14.2 Subscriber registration and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
153.	Category Three	Added OR 14.3.1 Subscriber registration requiring production of the Subscriber and User Register and a Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
154.	Category Three	Added OR 14.3.2 Subscriber registration requiring production of the Refusal Register and a Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
155.	Category Three	Edited OR 14.7 to require production of the Copy of Subscriber and User register setting out those Subscribers that have been suspended, restricted and terminated.	Amendment to better align with substantive MOR requirements as amended and explained above.
156.	Category Three	Added item Operating Requirement 14.7(h) requiring an ELNO to produce a Self-Certification that it has 'Complied with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
157.	Category Three	For Operating Requirements 15.7, 15.8 and 15.9, added the words 'if applicable'.	Not all the 'Documents to be produced' listed (Consolidated and categorised compliance failure notifications together with remediation action plans and their outcomes) will apply to a non-compliance remediation.
158.	Category Three	Added OR 16.3 Essential and Desirable Recommendations and requirement to produce the Essential recommendations document.	Amendment to better align with substantive MOR requirements as amended and explained above.
159.	Category Four	Amended the Documents to be published column in OR 11 to remove reference to Compilation of performance against targets set out in Schedule 2 and replace with 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
160.	Category Four	Amended the Documents to be published column in OR 14.2 to include the Refusal Register.	Amendment to better align with substantive MOR requirements as amended and explained above.
161.	Category Five	Edited 4.2(c) to delete 'updated' and replace with 'new' in Self-Certification to be provided column.	Amendment to better align with substantive MOR requirements as amended and explained above.

#	Rule	Amendments	Explanatory Notes
162.	Category Five	Added 'corporate' to Self-Certification to be provided column in 4.3.1.	Amendment to better align with substantive MOR requirements as amended and explained above.
163.	Category Five	Deleted 4.3.1(a)	Amendment to better align with substantive MOR requirements as amended and explained above.
164.	Category Five	Edited 4.3.1(b) to include 'Principals, Officers' and removed the capitalisation from employees.	Amendment to better align with substantive MOR requirements as amended and explained above.
165.	Category Five	Edited 4.3.2 to add the need to provide a 'new' Self-Certification to the Self-Certification column.	Amendment to better align with substantive MOR requirements as amended and explained above.
166.	Category Five	Edited 4.4 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
167.	Category Five	Edited 4.5 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
168.	Category Five	Edited 4.6 to remove Self-Certification and require Independent Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
169.	Category Five	Edited 4.7.1, 4.7.2 & 4.7.3 to require Self-Certification 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
170.	Category Five	Edited 4.7.4 & 4.7.5 to remove reference to the ORs in the Self-Certification column, correcting the grammar to show Compliance with 'the' requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
171.	Category Five	Added 4.7.6 Insurance and Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
172.	Category Five	Edited 4.8 - 4.11 to remove reference to the ORs in the Self-Certification column, correcting the grammar to show Compliance with 'the requirements'	Amendment to better align with substantive MOR requirements as amended and explained above.
173.	Category Five	Edited 5.1 Self-Certification column to include a requirement to produce a new Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
174.	Category Five	Edited 5.2 Self-Certification column to include a requirement to produce a new Self-Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
175.	Category Five	Edited 5.3(g) to include 'government' in Self-Certification to be provided column.	Amendment to better align with substantive MOR requirements as amended and explained above.
176.	Category Five	Edited the Subject column in OR 5.3(m) to show 'Industry Code membership'.	Amendment to better align with substantive MOR requirements as amended and explained above.
177.	Category Five	Added OR 5.3(n) Industry Code for e-Conveyancing Payments and a Self-Certification requirement for compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.

#	Rule	Amendments	Explanatory Notes
178.	Category Five	Edited 7.1 to update the subject line to Information Security Management System and added 'Current ISO 27001 Standard certification with audit report(s)' to the Document to be produced column. Self-Certification column amended to add 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
179.	Category Five	Added OR 7.1(b)(ii) Subscriber security policy with a requirement to produce the Assessment Protocol Policy and a No Change Certification or updated Document and Self-Certification confirming compliance with the requirement.	Amendment to better align with substantive MOR requirements as amended and explained above.
180.	Category Five	Added OR 7.2 Access to ELN, requiring a Self-Certification of 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
181.	Category Five	Added OR 7.3.1 Security of ELN and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
182.	Category Five	Added item Operating Requirement "7.3.2 – SOC 2 Type 2 report or other approved report" requiring ELNO to produce a Self-Certification that it has "Complied with the requirements".	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
183.	Category Five	Added OR 7.4 & 7.5 Data & Protection of Land Information and Self-Certification requiring compliance with the requirements.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
184.	Category Five	Added 7.6, 7.7 & 7.8 Digital Certificate Regime, Verifying Digital Signing & Verifying No Alteration requiring compliance with the requirements.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
185.	Category Five	Added 7.9 & 7.10 Jeopardised Conveyancing Transactions & Compromised Security Items and Self-Certification requiring compliance with the requirements.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
186.	Category Five	Added 7.11 Data Breach Notification and Self-Certification requiring compliance with the requirements.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
187.	Category Five	Edited 7.13 to include requirement to produce the Vulnerability assessment and penetration testing report.	New item to separate requirements under Operating Requirement 7.1 to 7.13 inclusive.
188.	Category Five	Edited 10.1(b) to replace 'Adaptability' with 'Functionality' in the Subject column, remove the Self-Certification requirement and edit the Independent Certification column to show 'compliance with the requirements'.	Amendment to better align with substantive MOR requirements as amended and explained above.
189.	Category Five	Edited OR 12 to show 12.1, removed reference to Fit for Purpose from the Independent Certification column, replacing it with 'complied with the requirements'. Within Schedule 5, for Operating Requirements 12, added the words 'complied with the requirements' into the Independent Certification to be obtained and supplied column, requiring the	Amendment to better align with substantive MOR requirements as amended and explained above.

#	Rule	Amendments	Explanatory Notes
		Independent Expert to certify that the Business Continuity Disaster Recovery Management Program complied with the requirements.	
190.	Category Five	Edited OR 13 to show 13.1, removed requirement for a Self-Certification and included a requirement for an Independent Certification confirming compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
191.	Category Five	Added OR 13.2 Change management and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
192.	Category Five	Removed reference to ORs 14.2 and 14.3 from OR 14.1.	Amendment to better align with substantive MOR requirements as amended and explained above.
193.	Category Five	Added OR 14.2 Subscriber registration and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
194.	Category Five	Added OR 14.3.1 Subscriber registration requiring production of the Subscriber and User Register and a Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
195.	Category Five	Added OR 14.3.2 Subscriber registration requiring production of the Refusal Register and a Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
196.	Category Five	Edited OR 14.5 to remove reference to the 'table of material amendments' when producing an 'updated' Document.	Amendment to better align with substantive MOR requirements as amended and explained above.
197.	Category Five	Added OR 14.7(h) Subscriber security policy compliance assessment and Self-Certification requiring compliance with the requirements.	Amendment to better align with substantive MOR requirements as amended and explained above.
198.	Category Five	Added words 'if applicable' to the Document to be produced column of OR 15.7, 15.8 & 15.9.	Amendment to better align with substantive MOR requirements as amended and explained above.
199.	Category Five	Added OR 16.3 Essential and Desirable Recommendations and requirement to produce the Essential recommendations document.	Amendment to better align with substantive MOR requirements as amended and explained above.
SCHEDULE 6 – Amendment to Operating Requirements Procedure			
200.	1.1	For a minimum period of 20 Business Days and minor grammatical amendments added.	To provide greater clarity as to the timing of consultation requirements for proposed amendments to the Operating Requirements.
201.	1.2	Added clause 'A draft proposal of any amendments, with explanatory notes, outlining the reasons for the proposed amendments must be included in the consultation'.	To provide greater clarity as to the timing of consultation requirements for proposed amendments to the Operating Requirements.
202.	1.3	Minor grammatical correction of 'the' to 'an' in first sentence.	For clarity of drafting.
203.	2.1	Added 'Notwithstanding paragraph 1' to the beginning of the sentence.	For clarity of drafting.
204.	2.2	Minor amendments to the first sentence.	For clarity of drafting.