



Industry Education Webinar:

Subscriber Compliance -
Secure Upload Portal



landservices.com.au



About our Land Services SA Team

This Industry Education Webinar was prepared by LSSA's Subject Matter Experts. Our staff have years of experience and are well respected in the Industry.

Alastair Byrne is a Senior Registration Officer within Land Services SA. With 30 years' experience, his main focus is providing support for complex registration dealings. Alastair has a wealth of knowledge in relation to technical and legislative advice.



Rebecca Fogarty is a Registration Officer within the Land Services SA team and has over 6 years of experience within the Registration Team. Rebecca is often the first point of contact for the Compliance Program and is dedicated to timely and professional customer service.



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ARNECC – Model Participation Rules

▶ [ARNECC.GOV.AU](https://www.arnecc.gov.au)

▶ **Participation Rules**

Under Section 23 of the [Electronic Conveyancing National Law \(SA\)](#) the Registrar-General issues Participation Rules for South Australia, that align with the [National Model Participation Rules](#) developed by Australian Registrar’s National Electronic Conveyancing Council (ARNECC).

Current Version

VERSION	EFFECTIVE
South Australian Participation Rules for Electronic Conveyancing Version 7	Effective from 28 March 2024





Compliance Examination

The South Australian Compliance Program is aligned with the National Compliance Program

THE COMPLIANCE PROGRAM

- ✓ Introduced in **October 2016**
- ✓ **150+** dealings audited annually
- ✓ Strong focus on **Industry Education**
- ✓ Monitor the obligations and practices that support certifications
- ✓ Ensuring requirements are being met as they relate to:



Topic	Guidance Note
Client Authorisation	ARNECC MPR Guidance Note #1
Verification of Identity	ARNECC MPR Guidance Note #2
Verification of Authority (Right to Deal)	ARNECC MPR Guidance Note #4
Retention of Evidence	ARNECC MPR Guidance Note #5



Source: https://www.arnecc.gov.au/publications/mpr_guidance_notes

Subscriber Compliance Portal - Secure File Upload



Background

The Subscriber Compliance Program audits industry members and the dealings they lodge, to ensure they are meeting their obligations.

Artefacts for auditing purposes often contain private information (Verification of Identity evidence such as passports, driver's licence etc), and this has historically been submitted to LSSA via email, in person or by post.



Purpose of the Portal - Overview

The **Subscriber Compliance Portal** is a secure online system used to upload evidence requested in a **Compliance Examination Notice**. It has been implemented to reduce risk, while also leading to an improved customer experience.

- Uploaded files are securely stored and made available to the LSSA Compliance team for examination.

Benefits

Key benefits of this new process involve better control of compliance risks. The new solution aims to:

- Reduce risks associated with the collection and storage of our customers' sensitive personal information,
- Improved experience for our customers, and
- Provision of an equitable service for regional, rural and interstate subscribers.





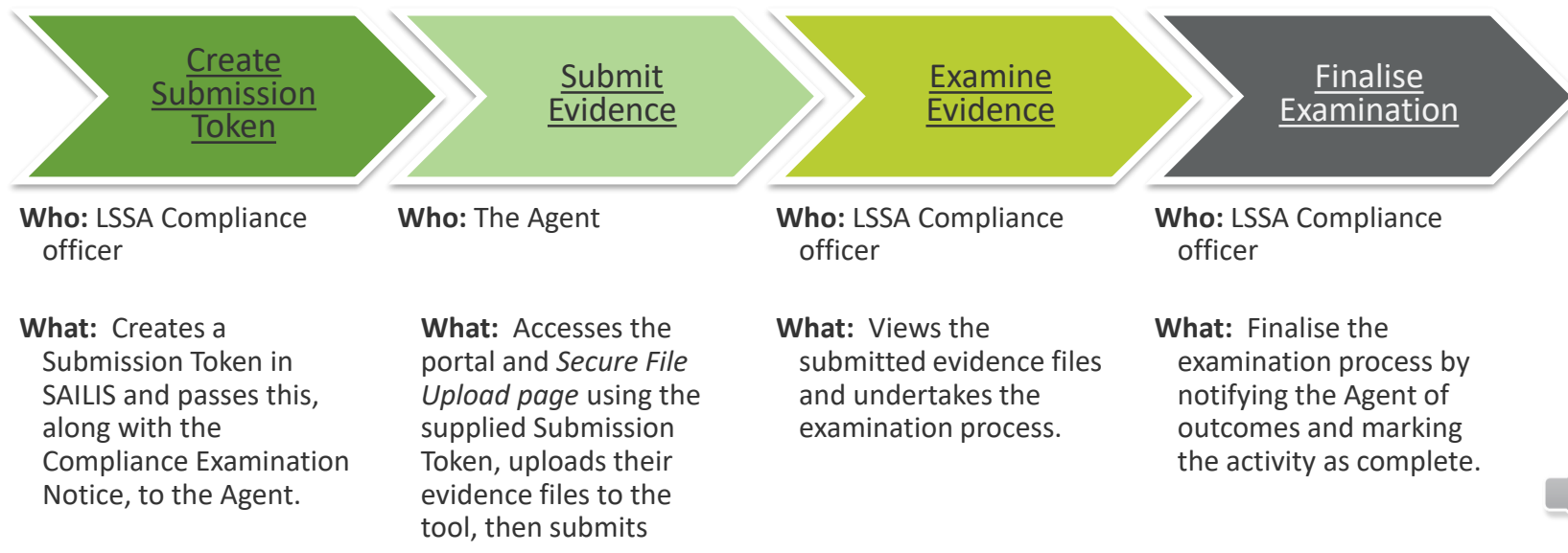
Subscriber Compliance Portal -Secure File Upload

A secure solution to receiving evidence for compliance audits.

How does the Subscriber Compliance Portal work?

A unique Submission Token is generated in SAILIS by the Compliance team, who then email a link to the portal and that token to the Agent. The Agent validates this token on the portal, allowing them to access the Secure File Upload page to upload and submit evidence files.

This process can be summarised into the following four activities for the purposes of Subscriber Compliance:





Evidence to be uploaded

Documents and Information to be Provided



Client Authorisation

- The client authorisation for the Conveyancing Transaction and any evidence supporting that Client Authorisation



Verification of Identity

- Details of the steps taken to verify the identity of your Client(s) and/or mortgagor(s), and any evidence supporting that verification of identity



Verification of Authority (Right to Deal)

- Details of the steps taken to verify the authority of your Client(s) and/or the mortgagor(s) Right to Deal in the Conveyancing Transaction or mortgage, and any other evidence supporting their verification of authority



Any other Evidence

- Demonstrating or supporting compliance with Prescribed Requirements if not already provided above.





Examination Notice with Submission Token

**Compliance Examination
Compliance Examination Notice**

Dear Sir/Madam,

In accordance with section 220A of the *Real Property Act 1886* (SA) (**RPA**) and section 33 of the *Electronic Conveyancing National Law (South Australia) Act 2013* (SA) (**ECNL**) (**Acts**), you and specific transactions in which you have been a representative have been selected to participate in the Compliance Examination Program.

The Compliance Examination Program has been established to ensure compliance with the Acts and to monitor that the obligations and practices which support the certifications made by the Legal Practitioners, Registered Conveyancers or Mortgagees, for both the paper and electronic transactions, are being met as they relate to:

- Verification of Identity
- Verification of Authority
- Client Authorisation
- Retention of Evidence

You are required to provide the supporting documentation by **19/01/2026**. This provides you 10 business days from the date this Notice is sent.

Please find attached a Compliance Examination Notice which outlines:

- The transaction(s) for which evidence of compliance is sought
- Details of the documents and information that are to be provided

The documents you provide must be submitted via our online Subscriber Compliance Portal. Please refer to the attached Privacy Collection Statement for information specific to the collection and use of the information you provide us.

The attached Compliance Examination Notice provides information on how to upload your documents using this secure Portal. To upload documents, you will need the following:

Submission Token: **3c58f0b-b794-445f-9eee-e90a98a3d30e**

Subscriber Compliance Portal URL: <https://sailis.lssa.com.au/admin/secure-file-submission/verify>

If you require additional information regarding the Compliance Examination Program, please visit www.landservices.com.au, or alternatively, please see the ARNECC Compliance Examinations [Guidance Note](#).

Should you have any concerns regarding the Compliance Examination Notice, you can contact us at any point at TTOCompliance@landservices.com.au.

Kind Regards

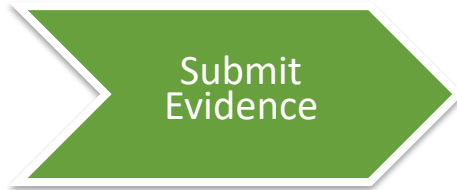
Test Employee

This is an example of the Compliance Examination Notice sent to the Client, with their unique Submission Token and the URL link for the Subscriber Compliance Portal.





Submit Evidence



How does the Agent submit their evidence?

Agents will access the Secure File Upload function within the Portal to upload and submit their evidence files. Instructions on how they access the Secure File Upload function is included in the Compliance Examination Notice and associated Email template.

Validating submission token

1. Agent navigates to the Subscriber Compliance Portal validation page by clicking the portal link contained in the examination notice.
2. The following information is populated into the validation page before the user can Continue:
 - a) **Email Address** = This is the 'Recipient's Email' that the notice has been sent to.
 - b) **Submission Token** = the Submission Token included with the Compliance Notice email.
 - c) **Acknowledgement of Collection Notice, LSSA Privacy Page and SAILIS Terms of Use** = checkbox must be checked.
3. Click '**Continue**'. Secure File Upload page displays allowing the user to upload and submit files (see next slide).

Continue button

Secure File Upload

* denotes a mandatory field

* Email Address

* Submission Token

If you are providing the Personal Information of others to LSSA through this Subscriber Compliance Portal, you must only do so if that other person agrees to you doing so and to LSSA processing their Personal Information in accordance with law, our obligations to the State of South Australia, our Privacy Policy and only if you have provided that individual/s with a copy of the Subscriber Compliance Portal Privacy Collection Statement.

Further information on our approach to privacy can be found on LSSA's [Privacy page](#) including LSSA's Subscriber Compliance Portal Collection Statement and in our [SAILIS Terms of Use](#).

I have read and acknowledge the above statement and LSSA's Privacy page and SAILIS Terms of Use.

Secure File Upload

Submission Purpose	Subscriber Compliance
Email Address	tejas.purohit@landservices.com.au
Submission Description	Dealing XYZ987654

Step 1 - Upload files from your local device. A maximum of 5 files can be uploaded at a time. Accepted file types: PDF, JPG, PNG and BMP.

Files

<input type="button" value="Choose File"/>	No file chosen	<input type="button" value="Remove"/>
<input type="button" value="Choose File"/>	No file chosen	<input type="button" value="Remove"/>
<input type="button" value="Choose File"/>	No file chosen	<input type="button" value="Remove"/>
<input type="button" value="Choose File"/>	No file chosen	<input type="button" value="Remove"/>
<input type="button" value="Choose File"/>	No file chosen	<input type="button" value="Remove"/>

Step 2 - Submit your files to Land Services SA.

A confirmation email will be sent to tejas.purohit@landservices.com.au and record of successful file submissions is available in your Submission History.



Submit Evidence continued

Upload files

On the next page, the user can select files from their local device to upload (by clicking 'Choose File', or on some browsers this may display as 'Browse File' or similar).

- Users can add up to 5 files using the file placeholders displayed. Filename will be displayed. Filenames cannot be changed in the portal.
- If a wrong file is selected, can remove it by clicking the 'Remove' button.
- Further files may be uploaded *after* initial submission.
- The file types accepted must be in PDF, JPG, PNG and BMP format.
- File size is limited to 20MB per document

Submit files

Files must be submitted by clicking '**Submit**'. The system then:

- Stores the files securely,
- Runs virus-scanning across each file,
- A confirmation email is sent shortly after.
- The upload page remains open, and the user can choose more files to upload if they wish.
- The 'Submission History' (accessible via the Secure File Upload function), allows the user to view a list of successfully submitted files.

Secure File Upload

Submission Purpose Subscriber Compliance
Email Address tejas.purohit@landservices.com.au
Submission Description Dealing XYZ987654

Step 1 - Upload files from your local device. A maximum of 5 files can be uploaded at a time. Accepted file types: PDF, JPG, PNG and BMP.

Files

Choose File	No file chosen	Remove
Choose File	No file chosen	Remove
Choose File	No file chosen	Remove
Choose File	No file chosen	Remove
Choose File	No file chosen	Remove

Step 2 - Submit your files to Land Services SA.
A confirmation email will be sent to tejas.purohit@landservices.com.au and record of successful file submissions is available in your Submission History.

Submit Submission History





Acknowledgement of Receipt email example

Compliance Examination **Acknowledgement of Receipt**

Dear Sir/Madam,

Thank you for providing the requested documentation and information in response to the Compliance Examination Notice (Submission token: <submission token>).

Please accept this as formal acknowledgement of receipt of the following files:

File Name	Submission Date Time	Submission Result
TAX*****748.pdf	04/09/2025 10:01:13	Submission Successful
DPL*****_58.pdf	04/09/2025 10:01:13	Submission Successful
F*****s.jpeg	04/09/2025 10:01:13	Submission Successful

We will be in contact regarding the outcome of the examination once the documentation has been reviewed.

Kind Regards

Land Services SA
Compliance Program



T: +61 8 8423 5000

E: LTOCompliance@landservices.com.au

A: 101 Grenfell Street, Adelaide 5000 | GPO Box 543, Adelaide SA 5001

W: www.landservices.com.au

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Acknowledgement of Receipt

The system sends an automated Acknowledgement email to the Email Address associated with the Submission Token. This email includes a list of all files the user submitted, and whether those files were successfully submitted or failed.

- Note: Files may fail submission for a number of reasons, mostly due to failing virus scanning, but potentially due to lost connection or other system issues. Files can only be uploaded using an internet connection within Australia.





Guide and Frequently Asked Questions

www.landservices.com.au/land-registration/compliance-program/



Subscriber Compliance Portal Guide and Frequently Asked Questions

Getting Started

What is the Subscriber Compliance Portal?

Representatives who have been selected for a compliance examination will have been sent a Compliance Examination Notice via email from Land Services SA. This notice includes information specific to the compliance program and the transaction(s) for which evidence must be provided.

The Subscriber Compliance Portal has been developed to enable secure submission of evidence in response to a compliance audit. This guide provides information on using the portal to upload and submit your evidence, including how you can view a history of the files you have previously submitted.

How do I access the portal?

The Compliance Examination Notice sent to Representatives or Agents includes a link to the portal. Representatives will be required to use the link each time they need to access the portal.

1. Click the 'portal link' included in the Compliance Examination Notice. The portal will open in a default web browser.
2. When prompted, the following information should be entered:
 - o **Email address** – this is the email address that the Compliance Examination Notice was sent to.
 - o **Submission Token** – the Submission Token can be found in the Compliance Examination Notice email.
 - o **Acknowledge Collection Notice** – the Collection Notice, LSSA Privacy Policy and Terms of Use will be required to be read and acknowledged by checking the checkbox.
3. Click 'Continue'. The Secure File Upload page will be displayed, allowing the Representative or Agent to upload and submit evidence files.

Do I need access to my SAILIS account?

No, access to a SAILIS account will not be required for the purposes of accessing or submitting files via the Subscriber Compliance Portal. Only an active Submission Token and a linked email address will be required. These details will be provided by Land Services SA to the Representative or Agent selected for audit, upon receipt of the Compliance Examination Notice.

Can I change the email address that I use to access the portal?

The email address to which the Compliance Examination Notice was sent to has been linked to the Submission Token. If you have concerns about the email address, please contact the Land Services SA Compliance team via email at LTOCompliance@landservices.com.au, or call us on (08) 8423 5000.

Can I access the Portal more than once?

Yes, so long as the Submission Token being used remains active. A Submission Token will become inactive if the audit has been marked complete, or if the token has been cancelled (this may occur if there is an error with the token). The system will return an error if access to the portal is attempted by using an Email Address or Submission Token that are not recognised by the system.

Who do I contact if I cannot access the portal?

Please contact the Land Services SA Compliance team via email at LTOCompliance@landservices.com.au, or call us on (08) 8423 5000 as soon as practical.

Uploading and Submitting Files

How do I upload and submit files?

The Secure File Upload page within the Subscriber Compliance Portal provides the ability to upload evidence files in response to the compliance audit. The page displays 5 file placeholders, with each placeholder allowing for a single file to be uploaded in readiness to be submitted. Additional files can be uploaded after the initial submission.

1. On the 'Secure File Upload' page, select the option next to a file placeholder to browse for a file (depending on the browser, this may say 'Choose File' or 'Browse File' or similar).
2. Locate and select the file to be uploaded using the file browser.
3. Once a file is selected, the filename will be displayed within the file placeholder. This filename cannot be changed via the portal. Steps 1-3 can be repeated for any further files that need to be uploaded.
4. Click the 'Submit' button to submit the files to Land Services SA. A confirmation email will be sent shortly after.

What evidence do I need to upload?

Applicable transaction(s) will be detailed in the 'Submission Description' field displayed on the 'Secure File Upload' page. Specific information on what evidence will be required to be uploaded and submitted to Land Services SA for each transaction will be included in the Compliance Examination Notice.

Important: For each transaction being audited, a completed 'Subscriber Compliance Examination Checklist' must be uploaded via the Subscriber Compliance Portal. The checklist can be found in the Compliance Examination Notice.

What file types can I upload?

The portal accepts the following file types:

- o PDF
- o JPG
- o PNG
- o BMP

Is there a maximum file size?

Yes. Individual files up to but not exceeding 20MB can be uploaded. Files larger than this will not be accepted.

Can I submit more files?

Yes. To submit additional files, repeat the steps outlined in the section 'How do I upload and submit files?'. Additional files can be uploaded and submitted while still logged in to the portal, or upon re-logging into the portal at any time. Once the Compliance Team have completed the audit, the Submission Token will be marked complete and will no longer provide access to the portal.

File Management and Security

How do I delete a file I have uploaded?

Files uploaded but not yet submitted can be removed from the file placeholder by clicking 'Remove' next to the file placeholder.

Can I delete files I have already submitted?

No. Once 'Submit' is clicked, the files uploaded are sent to Land Services SA for examination. If files have been submitted in error, please contact the Land Services SA Compliance Team via email at LTOCompliance@landservices.com.au, or call us on (08) 8423 5000.

Who can access the files I submit and how long will they be kept?

The Land Services SA Compliance Team, responsible for undertaking the compliance examination process, will have view-only access to the files submitted.

Further information on our approach to privacy can be found on LSSA's [Privacy page](#) including LSSA's Subscriber Compliance Portal Collection Statement and in our [SAILIS Terms of Use](#).

Confirmation and Communication

How do I know my files have submitted successfully?

Files submitted to Land Services SA via the portal are virus-scanned and securely stored awaiting the Compliance Team's examination. The system will automatically send an *Acknowledgement of Receipt* email to the email address entered when accessing the portal. This email will include the status of each file submitted:

- o **Submission Successful** – the file was successfully submitted to Land Services SA and will be examined.
- o **Submission Failed** – the file was not successfully submitted to Land Services SA, meaning the file cannot be examined.

A history of successful submissions can be found within the portal by clicking the 'Submission History' button on the 'Secure File Upload' page. Note that this page lists only successful submissions. File names appear partially masked to ensure data security.

What if I am asked to submit additional evidence?

During examination, the Compliance Team may identify certain evidence as being incomplete or missing. Should this be the case, they will contact the Representative via email to request the additional evidence files. These files must be uploaded and submitted via the Subscriber Compliance Portal.

How will I know once the compliance examination has completed?

Once the compliance examination has completed, an email confirming completion will be provided by the Land Services SA Compliance Team.



1



2



3



Subscriber-Compliance-Portal-Guide-and-Frequently-Asked-Questions.pdf



Summary of Key Points

Subscriber Compliance Portal

Evidence Files are now required to be provided to the Compliance Team via the Secure File Upload page within the Portal.

Submission Token

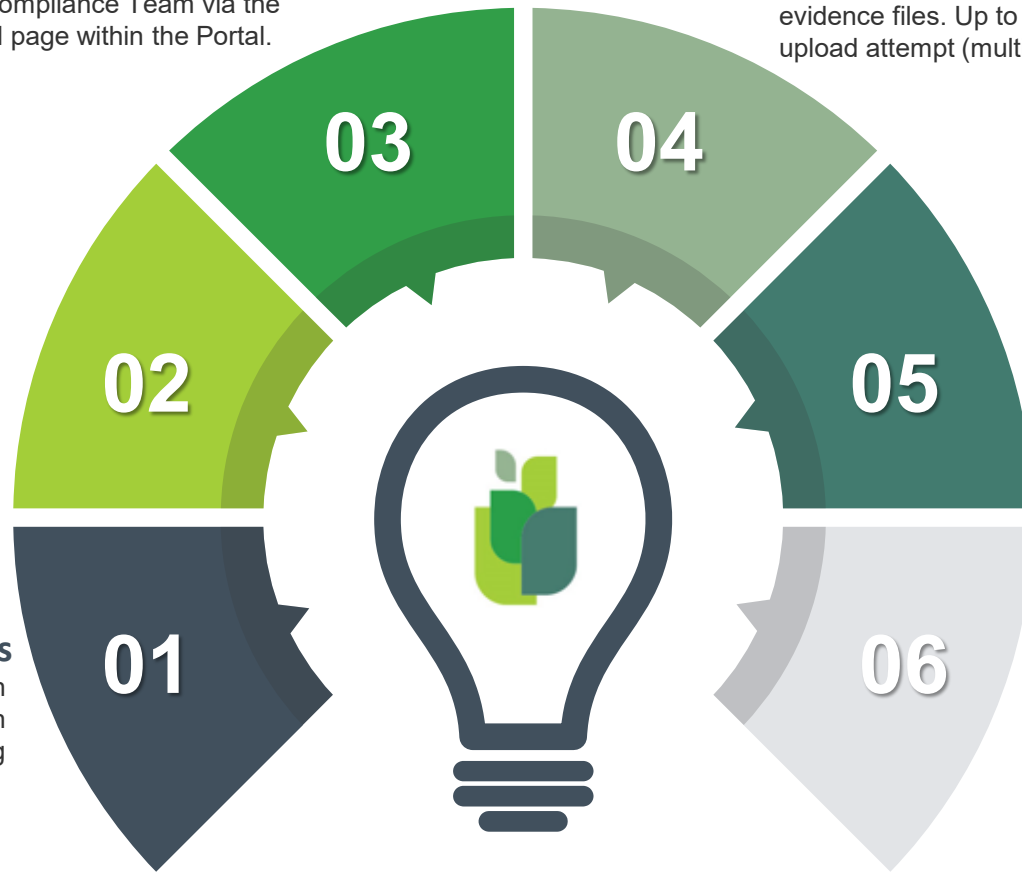
Keep a record of your unique submission token, as the portal can be accessed more than once to upload relevant evidence files. Up to 5 files can be uploaded during each upload attempt (multiple attempts can be made).

Retain Your Evidence

Copies of Client Authorisation, VOI, VOA, and other relevant documents should be retained by your office for the prescribed period.

Participation Rules

Practitioners need to be familiar with the South Australian Participation Rules for Electronic Conveyancing Version 7.



File Types

Accepted File Types Include:
PDF / JPG / PNG / BMP
File Size: 20MB per file




Subscriber Compliance Portal - Guide and FAQs







Available from the LSSA Website.



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For Professionals



Live Q&A Session





Q&A Talking Points

I am concerned about my client's privacy - What happens to the files I have uploaded to the Portal when the audit is complete?

•The Land Services SA Compliance Team, responsible for undertaking the compliance examination process, will have view-only access to the files submitted. The uploaded files are securely stored within SAILIS. Once the compliance team have completed an audit, the files uploaded by the agent are securely archived by the system. Further information on our approach to privacy can be found on LSSA's Privacy page including LSSA's Subscriber Compliance Portal Collection Statement

What do you mean by "reasonable steps" - how do I know if I have done enough?

•*"Reasonable steps"* is a commonly used legal concept. When applied to representatives and mortgagees, it means the taking of such steps as an ordinarily prudent representative or mortgagee would have taken in the circumstances and in the ordinary course of their business. Whether reasonable steps were taken will be a question of fact depending on the circumstances of the individual case. Ultimately, this would be determined by a Court on an objective basis.

Will the LTO consider revising its approach to ID document retention to align with AUSTRAC's less onerous AML record-keeping requirements and reduce data security risks?

•At this stage we have not received any advice from ARNECC that there will be any change to the current VOI Requirements.