



Office of the
Superintendent
of Real Estate



REAL ESTATE COUNCIL
OF BRITISH COLUMBIA

Results of Policy Intentions Consultation on the Regulation of Real Estate Teams

Consultation Summary Report

June 2021

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Executive Summary

On February 9, 2021, the Office of the Superintendent of Real Estate (**OSRE**) and the Real Estate Council of BC (**RECBC**) opened a policy intentions consultation on potential enhancements to the regulation of real estate teams. The consultation was supported by a [discussion paper](#) that identified issues related to teams and proposed improvements to the regulatory framework by:

1. Defining “teams” in the Rules
2. Requiring all teams to register with the regulator
3. Reserving the term “team” only for use by teams; and
4. Enhancing managing broker and brokerage control of teams

More formalized regulation of teams will provide greater consumer protection, while still enabling British Columbians to take advantage of the benefits that teams offer. The discussion paper solicited licensee feedback on potential regulatory enhancements and did not contain any proposed amendments to the Real Estate Rules (**Rules**). Additional background information on the consultation is available in Appendix A.

This report focuses on the high-level themes that were identified through the consultation and provides brief responses from OSRE and RECBC. Key themes include:

- Generally, many respondents were supportive of the intent behind the four policy proposals in the discussion paper.
- There was mixed feedback regarding defining the term "teams" in the Rules. While many respondents indicated that the proposed definition made sense and reflected current practices, some respondents expressed concerns, including the impact of the proposed definition on existing teams with a single licensed member.
- Although there were a few general concerns with potential cost, timing, and operational impacts of required registration for teams, the majority of feedback was supportive of team registration.

- Many different terms were brought forward as possible options for the exclusive use of real estate teams. Despite the variety of suggestions, it was clear that respondents were generally in favour of reserving the term “team” for the exclusive use of regulated real estate teams.
- There were many different suggestions for the length of time to provide existing teams to come into compliance with potential rule changes. While the responses were quite mixed, there was general agreement that the regulator should consider different scenarios/situations when determining the appropriate amount of time for teams to comply with any new rules.
- Regarding managing broker involvement in the creation of teams and their membership, many respondents highlighted managing brokers’ existing duties to supervise their brokerage's related licensees and that additional team-specific rules and practices may not be required where managing brokers provide robust oversight. In addition, similar to the feedback we received in relation to our work on managing brokers, there was a sense that managing brokers are already experiencing high workloads and cannot take on significant additional duties.
- Respondents were interested in receiving more information about how the proposals would be implemented.
- Other respondents suggested new requirements or practices related to teams, which are out of scope for the current work.

The consultation period closed on April 2, 2021. In total, OSRE received 356 survey responses during the 7-week consultation period and a handful of e-mail responses. The BC Real Estate Association and the local real estate boards also made a joint submission. All comments that were provided in the survey and email submissions were considered by OSRE and RECBC. A summary of survey demographics is available in Appendix B.

Consultation Feedback

Defining “Teams” in the Rules – Information

The consultation sought feedback on the idea of defining real estate teams in the Rules and providing related guidance based on the following proposed principles:

- Teams must have at least two licensed members.
- All team members must be related to the same brokerage.
- Team members can only provide real estate services through their team.
- Teams represent themselves to the public as a single entity.
- Licensees can only be a member of one team at a time.
- Team members are collectively the designated agent of all clients of the team.

A regulatory definition will help ensure greater consistency in the operation and conduct of teams. Creating a definition of “teams” in the Rules will provide a necessary foundation for the regulator to publish guidelines and make other proposed changes described in the discussion paper, following the lead of several other jurisdictions in Canada and the United States.

Survey respondents were asked to provide feedback on:

- The proposed principles that could inform a definition of “teams” in the Rules
- The potential consequences of such a definition, and
- Other general comments regarding a regulatory definition of teams.

Key themes from survey participants’ feedback related to providing a regulatory definition of teams, along with regulator comments, are provided in the table below.

Defining “Teams” in the Rules – Feedback Themes

Key Theme	Regulator Comments
<p>Respondents indicated general support for the proposal, including the requirement that teams have two or more licensed members. Many respondents indicated that their teams already comply with most of the principles behind the proposed definition of “teams.”</p>	<p>The proposed regulatory definition does not substantially change existing practices. The intent of this work is to establish a strong regulatory framework for real estate by clarifying <u>existing</u> requirements and practices; as such, it is expected that teams would already comply with most aspects of the proposed definition.</p>
<p>Team members should not be considered the designated agent for all clients of the team. Team members should be able to separate their duties to clients from other team members.</p>	<p>It is unclear what purpose a team would serve other than the collective provision of real estate services to clients. Long-standing regulatory practice considers all team members collectively to be the designated agent of the team’s clients. Many of the comments disputing this existing practice demonstrate a fundamental misunderstanding of how agency is formed, and the duties agents owe to their clients. RECBC offers a variety of resources for licensees to inform themselves of their agency and fiduciary duties to clients, including when acting as a member of a team. These include continuing education courses, Knowledge Base guidelines and informational articles in newsletters.</p>
<p>Regulators are not providing adequate enforcement of existing requirements. Respondents provided anecdotal reports of non-compliant licensee business practices (e.g. unregistered teams, team members representing multiple parties in the same transaction, confidentiality and conflicts of interest involving family members).</p>	<p>Licensees must hold themselves, and each other, to the highest ethical standards and have an ethical duty to report allegations of misconduct promptly. Licensees have a unique perspective on the conduct of their peers and are well-positioned to identify and report potential misconduct to the regulator.</p>

The regulator needs to provide additional consideration and guidance related to the operational considerations and consequences of the proposed regulatory definition, such as giving consideration to what happens when one member of a 2-member team decides to strike out on their own or guidance on how to distinguish between a team and other forms of licensee cooperation (e.g. co-listing, vacation coverage, hosting open houses, referral networks).

If this proposal moves forward, the regulator will give further consideration to how to manage changes in team membership as part of its administrative practices, similar to the transition period being considered for existing single-licensee teams. The regulator will also give guidance on the issues flagged, including co-listings, vacation coverage, hosting open houses and referral networks.

Respondents provided alternative proposals that would create new regulatory requirements for teams (e.g. team leader qualifications, maximum team size).

These proposals are out of scope for the current work, which is looking at establishing a strong regulatory framework for real estate by clarifying existing requirements and practices. These comments and suggestions may be considered in future work.

Requiring All Teams to Register with the Regulator - Information

The consultation sought feedback on a proposed Rule amendment requiring all teams to register with the regulator. Currently, the Rules require that a group of licensees that advertise under a team name must register with and have the team name approved by the regulator.

Mandatory registration for all real estate teams, including those that currently operate under a registration exemption, will enable the regulator to collect complete and share accurate teams-based data, including how many teams are in operation, which licensees are operating as a team, the size of teams, and other data that will provide a better understanding of this business practice. Requiring all teams to register with the regulator will also provide consumers and licensees with a clearer understanding of the representation being provided and duties owed to a team's client.

Two questions were posed on this subject, seeking feedback on:

- The timing of a reasonable transition period to allow existing teams to come into compliance with new rules, and
- Other general comments regarding team registration requirements.

Key themes from survey participants' feedback related to the proposed team registration requirement, along with regulator comments, are provided in the table below.

Requiring All Teams to Register with the Regulator – Feedback Themes

Key Theme	Regulator Comments
<p>The proposal to require all teams to register with the regulator was met with broad support from most respondents.</p>	<p>The proposed Rule amendment requiring all teams to register with the regulator is not too different than existing practice, as RECBC currently requires teams to register their team name if the team intends to advertise. The proposed change to the Rules will provide the regulator with more relevant and accurate teams-based data, and will more clearly lay out the requirements of what makes a team, what representation is being provided, and what duties are owed to clients.</p>
<p>Respondents indicated that a transition period of 3-6 months would be reasonable.</p>	<p>There are many different considerations at play in determining an appropriate amount of time for existing teams to come into compliance with any proposed Rule changes. There are also timing considerations relating to advertising and naming requirements and existing unregistered teams that will need to be examined when considering a reasonable transition period.</p>
<p>Teams should be limited to a maximum number of licensed members.</p>	<p>These proposals are out of scope for the current work, which is looking at establishing a strong regulatory framework for real estate by clarifying <u>existing</u> requirements and practices. These comments and suggestions may be considered in future work.</p>
<p>As part of this new requirement to register all teams with the regulator, some individuals wanted to see additional rules introduced that outline and clarify the role of team leader.</p>	<p>These proposals are out of scope for the current work, which is looking at establishing a strong regulatory framework for real estate by clarifying <u>existing</u> requirements and practices. These comments and suggestions may be considered in future work.</p>

<p>The regulator should reduce barriers and red tape related to registering teams and updating team membership. An online registration system was proposed to make updates instantaneous.</p>	<p>The regulator agrees that the registration process should be an easy and straightforward process. Online options will be explored, but an analysis of internal systems capability and brokerage compliance needs to be undertaken before any decision is made. If an electronic registration system is not feasible, electronic filing of required documents may be explored.</p>
<p>The regulator must ensure there is better enforcement of these new requirements and a clear path to report non-compliance once these Rules come into force.</p>	<p>Licensees must hold themselves, and each other, to the highest ethical standards and have an ethical duty to report allegations of misconduct promptly. Licensees have a unique perspective on the conduct of their peers and are well-positioned to identify and report potential misconduct to the regulator. Non-compliance can be reported to OSRE and RECBC through their respective websites.</p>
<p>Additional regulatory requirements for teams are unnecessary. There are more pressing issues that the regulator should be investigating.</p>	<p>Through consultation on the Role of Managing Brokers in B.C.'s Changing Real Estate Landscape, the regulator heard concerns about real estate teams, including a general lack of consumer and licensee understanding of agency relationships and a lack of proper disclosure of representation at the outset of a relationship. A review of the feedback from this consultation confirmed that there may be a lack of understanding of agency relationships as they apply to teams. A stronger regulatory framework with clearer requirements and guidelines is expected to resolve a number of team-based issues and provide a better understanding of agency relationships as they apply to teams.</p>

Reserving the Term “Team” Only for Use by Teams - Information

The consultation sought feedback on the development of guidelines or a new Rule that would prevent brokerages from registering a trade name that includes the term “team.”

For members of the public, the distinction between brokerages and teams can be confusing, as can the difference between brokerage agency and designated agency. Since teams always operate collectively under designated agency (each team member owes the same duties to all of the team’s clients), it can be confusing for the public when they are faced with a brokerage model that is fundamentally different, especially if the brokerage uses the word “team” in their name but practices designated agency.

Restricting brokerages from using the word “team” in their brokerage name will more clearly delineate brokerages from teams, which will help prevent public confusion. The discussion paper noted that legacy options would be considered for the limited number of brokerages that currently use the term “team” in their name.

Three questions were posed to survey participants, seeking feedback on:

- Which terms, other than “team,” should be reserved for exclusive use of real estate teams, if any,
- Which terms should be reserved for the exclusive use of brokerages, if any, and
- Any other comments regarding team name considerations.

Key themes from survey participants’ feedback related to reserving the term “team” only for use by teams, along with regulator comments, are provided in the table below.

Reserving the Term “Team” Only for Use by Teams – Feedback Themes

Key Theme	Regulator Comments
<p>Most respondents were in favour of reserving the term “team” for the exclusive use of teams.</p>	<p>There are currently a small number of brokerages that use the term “team” in their name. The purpose of this proposal is to prevent new brokerages from using the term “team” in order to reduce any public confusion surrounding the difference between brokerages and teams and what agency duties are owed under the different service models.</p>
<p>Respondents suggested additional terms that should be reserved for exclusive use by real estate teams, including “group,” “associates,” “partnership,” and “collective.”</p>	<p>In determining whether any additional terms should be reserved for the exclusive use of real estate teams, the regulator will look at existing naming conventions and uses of additional terms to determine the impacts of doing so. Careful consideration of the potential consequences of such a change will need to take place before any decision is made.</p>
<p>Teams should be required to have the term “team” in their name.</p>	<p>As noted in the discussion paper, approximately 56% of teams currently registered with the regulator do not use the term “team” in their name. Requiring the usage of the term “team” would impact a significant subset of teams and licensees. Careful consideration of the potential consequences of such a change will need to take place before any decision is made.</p>
<p>Respondents suggested additional terms that should be reserved for exclusive use by brokerages, including “brokerage,” “realty,” and “real estate.”</p>	<p>The intention of restricting or reserving specific terms for exclusive use by brokerages is to increase public understanding and reduce public confusion regarding brokerages. The regulator already provides guidance regarding team names to ensure that team names do not give the impression of being a separately licensed brokerage. In determining whether any additional terms should be reserved for the exclusive use of real estate brokerages, the regulator will look at existing naming conventions and uses of additional terms to determine the impacts of doing so. Careful consideration of the potential consequences of such a change will need to take place before any decision is made.</p>

<p>Brokerages should have to identify their business using the term “brokerage” in their name.</p>	<p>This proposal is out of scope for the current work, which is looking at establishing a strong regulatory framework for real estate teams by clarifying <u>existing</u> requirements and practices for teams. These comments and suggestions may be considered in future work.</p>
<p>Licensees who were not part of a registered team but employed a “team” of unlicensed people to assist with various aspects of their business, were concerned that the exclusive use of the term “team” would make it difficult for them to advertise their additional services.</p>	<p>Licensees should be mindful of ensuring that their marketing materials comply with regulatory requirements, including avoiding suggesting to the public that they are a team if they are not registered as such. If changes are made to team advertising requirements, the regulator will publish guidance to help navigate issues related to team registration and advertising, including references to unlicensed persons.</p>
<p>Teams should have additional restrictions related to their operations and advertising so as not to appear as “mini-brokerages” or as being independent from their brokerage.</p>	<p>Current advertising requirements for teams require that teams prominently display their brokerage name on any advertisement. The name must be easily readable in relation to the rest of the advertisement. Licensees are advised to choose a team name that clearly conveys to the public that they are working as a team. The purpose of these requirements is to make sure the public is neither misled nor confused as to who is providing real estate services. Scenarios that were provided by respondents describing situations where teams may not be acting in accordance with the Rules and regulatory guidelines may be considered in accordance with this proposal or at a later time, as the regulator works to strengthen the regulatory framework.</p>

Enhancing Managing Broker and Brokerage Control of Teams – Information

The consultation sought feedback on the idea of amending existing forms and developing regulatory guidelines to strengthen the managing broker's role in the oversight of teams.

Managing brokers play a central role in ensuring brokerages and individual licensees uphold regulatory requirements. Managing brokers have expressed an interest in having a stronger role in overseeing teams, consistent with their supervision and compliance duties at brokerages. Neither the Rules, nor existing team-related forms, require managing broker or brokerage involvement/approval to create teams or add team members.

To support managing broker oversight of teams, the regulator proposed to develop regulatory guidelines and related tools and resources that will help managing brokers identify issues related to teams and set appropriate brokerage controls, policies, and procedures to address them.

Two discussion questions were provided, seeking feedback on:

- The role of managing brokers in approving the creation of teams or team membership, and
- Other general comments regarding oversight of teams.

Enhancing Managing Broker and Brokerage Control of Teams – Feedback Themes

Key Theme	Regulator Comments
<p>Many respondents expressed general support for the idea of enhancing managing broker and brokerage oversight of teams, including a more formal role for managing brokers in approving team creation and membership. This theme was consistently expressed by respondents from all licence levels.</p>	<p>Managing brokers are responsible for overseeing the real estate services provided on the brokerage’s behalf by its related licensees. This includes, for example, setting policies and procedures in relation to licensee business practices, such as the creation of teams and changes to team membership. While it is expected that managing brokers are already involved in these matters at their brokerages, this proposal would provide additional tools and guidance for managing brokers to support them in establishing robust supervisory practices in relation to teams of related licensees.</p>
<p>Managing brokers and brokerages should <u>not</u> have greater influence and control over team business practices, including in relation to team creation and membership. This theme was consistently expressed by respondents from all licence levels.</p>	<p>Managing brokers are responsible for overseeing the real estate services provided on the brokerage’s behalf by its related licensees. Similarly, licensees are required to keep the managing broker informed of the services they provide on behalf of the brokerage. The regulator expects managing brokers to establish robust supervisory practices that ensure that their brokerage’s related licensees’ business practices, including the business practices of any teams, comply with regulatory requirements.</p>
<p>Managing brokers already have broad responsibilities under the regulatory framework and may be overextended. This theme was consistently expressed by respondents from all licence levels.</p>	<p>The regulator recognizes the breadth of duties managing brokers perform and have published a variety of resources to assist them in their work. Ultimately, managing brokers are expected to establish effective brokerage controls, policies and procedures to ensure that the brokerage’s related licensees comply with the regulatory framework. Additional information and resources are available on the regulator’s website.</p>

<p>Additional oversight of teams would not be required if managing brokers provided robust oversight of all the brokerage's related licensees.</p>	<p>The regulator expects managing brokers to establish robust supervisory practices that ensure that their brokerage's related licensees' business practices comply with regulatory requirements. This expectation applies equally to licensees who are members of teams as to those who are not. This proposal does not alter existing regulatory requirements; rather, it proposes providing additional tools and guidance for managing brokers to support them in upholding their current supervisory duties in relation to teams.</p>
<p>Managing brokers may be engaging in conflicts of interest that impair their ability to adequately oversee teams, particularly where they are also a team member.</p>	<p><u>All</u> licensees have a duty to take reasonable steps to avoid conflicts of interest. While managing brokers are able to provide real estate services directly to clients, doing so gives rise to an obvious conflict between their duties to clients and their duty to treat the interests of the brokerage's clients in an even handed, objective and impartial manner. In order to resolve this conflict, managing brokers are expected to delegate their supervisory duties in relation to any transactions in which they are directly involved in representing a client to another related licensee (e.g. an associate broker or another managing broker). The regulator has published guidance on this matter on the Knowledge Base.</p>
<p>Respondents provided a number of alternate proposals that would create new regulatory requirements for real estate teams and their members (e.g. establishing a formal role for team leaders, establishing vicarious liability for team leaders).</p>	<p>These proposals are out of scope for the current work, which is looking at establishing a strong regulatory framework for real estate teams by clarifying <u>existing</u> requirements and practices. However, these comments and suggestions have been noted and may be considered at a later time.</p>

General Feedback

The consultation survey included two general comment opportunities in relation to the regulation of real estate teams and other general feedback.

Other Feedback on the Regulation of Real Estate Teams

Key Theme	Regulator Comments
Unlicensed assistants should be able to remain as part of a team, given their integral services and activities.	The proposed approach to unlicensed assistants is intended to better mirror the approach to unlicensed assistants in brokerages more generally, where such positions are not formally reported or registered with the regulator. Existing advertising guidelines state that if an advertisement includes the names of an unlicensed team member, they must be identified as being unlicensed; this guidance would likely continue. While unlicensed individuals would not be required to register with the regulator as a team member, should this proposal proceed, the regulator will consider providing additional guidance with respect to teams working with unlicensed assistants or other unlicensed individuals.
Teams should have to operate out of the brokerage office so as not to give the impression to the public that they are independent from the brokerage.	Section 4-3 of the Rules outlines the restrictions relating to home and other personal offices. Although the regulator offers guidelines with respect to this Rule, the need for additional guidance with respect to teams will be considered.
The regulator needs to provide additional detailed guidance on what makes a team (e.g. regularly hosting open houses for each other's listings, and having a standard commission sharing agreement between multiple licensees).	The Teams Discussion Paper provided a number of examples of activities that may indicate to the regulator and consumers that a group of licensees may be working as a team. Doing one of the activities on the list in and of itself may not be enough of an indicator that a group of licensees are operating as a team; however, if there is a pattern of activity that could lead a

reasonable person to believe that two or more licensees from the same brokerage are working together to represent clients, the regulator may determine that the licensees are part of a team, and act accordingly. The list is not meant to be exhaustive and may be revised further as this work continues. Licensees are reminded that they have an obligation to comply with all of the provisions of the *Real Estate Services Act*, the Real Estate Services Regulation, and Rules; if two or more licensees are acting in a team capacity, under the proposed changes, they would have to register with the regulator.

Other General Feedback

Key Theme	Regulator Comments
The regulator needs to provide additional outreach and education initiatives targeted to real estate consumers.	The regulator agrees that an informed consumer is a protected consumer and are committed to strengthening resources for consumers related to real estate teams.
The regulator needs to actively monitor licensee business practices and enforce regulatory requirements.	The regulator takes allegations of licensee misconduct very seriously. Further, licensees must hold themselves, and each other, to the highest ethical standards and should report allegations of misconduct to the regulator. Licensees have a unique perspective on the conduct of their peers and are well-positioned to identify and report potential misconduct to the regulator.
The regulator needs to ensure adequate education and qualification requirements for licensees, both at the pre-licensing stage	RECBC recently completed a review of licensing education and identified opportunities to enhance it, including through a new "apprenticeship" component in the Applied Practice Course. In addition, RECBC has introduced a number of new continuing education requirements, including revising the structure of Legal

<p>and through continuing education after licensing.</p>	<p>Update, introducing education related to significant Rule changes related to agency and disclosure, and introducing a program of ethics education. The regulator will continue to monitor education and qualification requirements for licensees to ensure licensees have an adequate foundation to support competent practice.</p>
<p>Licensees have experienced a lot of change in recent years and are experiencing change fatigue.</p>	<p>The policy proposals outlined in the discussion paper are intended to establish a strong regulatory framework for real estate by clarifying <u>existing</u> requirements and practices for real estate teams. For the most part, these proposals would not create significant new requirements or changes to current practice. Where there are impacts, consideration will be given to how any changes are implemented so that licensees have time to adjust their operations and practices.</p>

About the Regulator

OSRE is a regulatory agency of the BC government that protects consumers who are buying and selling or otherwise acquiring or disposing of real estate in the province. OSRE provides oversight and support to the real estate industry in BC and is mandated to protect the public interest and prevent harm to consumers.

Under the *Real Estate Services Act (RESA)*, the Superintendent of Real Estate has broad powers to make rules governing licensee conduct. OSRE works closely with RECBC to fulfil its consumer protection mandate.

Additional information about OSRE is available at www.gov.bc.ca/osre.

RECBC is a regulatory agency established by the provincial government in 1958. Its mandate is to protect the public interest by enforcing the licensing and licensee conduct requirements of RESA. RECBC is responsible for licensing individuals and brokerages engaged in real estate sales, rental and strata property management. RECBC also enforces entry qualifications, investigates complaints against real estate licensees and imposes disciplinary sanctions under the Act.

RECBC's mission is to protect the public interest by promoting and enforcing standards to raise the competency and conduct of real estate licensees in British Columbia. In collaboration with OSRE, RECBC works to achieve the shared goal of a fair, transparent and consistent regulatory system for real estate services in British Columbia.

Additional information about RECBC is available at www.recbc.ca.

On November 12, 2019, the Government of British Columbia announced that OSRE and RECBC would be amalgamated with the BC Financial Services Authority (BCFSA) into a single financial services regulator. The amalgamation is anticipated to take effect in the summer of 2021.

Appendix A: Background

On February 9, 2021, the Office of the Superintendent of Real Estate (**OSRE**) and the Real Estate Council of BC (**RECBC**) opened a policy intentions consultation on potential enhancements to the regulation of real estate teams. The consultation was supported by a [discussion paper](#) that identified issues related to teams and proposed improvements to the regulatory framework by:

1. Defining “teams” in the Rules
2. Requiring all teams to register with the regulator
3. Reserving the term “team” only for use by teams; and
4. Enhancing managing broker and brokerage control of teams

The four policy proposals to enhance the regulation of real estate teams were developed jointly by OSRE and RECBC. In addition, preliminary consultations were conducted with RECBC’s Trading Services Advisory Group (**TSAG**) and the BC Real Estate Association (**BCREA**) in August and September 2020. Public and licensee feedback on the policy proposals was provided through an online survey, which closed on April 2, 2021 following a seven-week consultation period. Details on the consultation as well as a link to the survey were posted on OSRE’s website and over 25,000 real estate licensees received an email in which they were asked to provide feedback using the survey. OSRE and RECBC also encouraged the public and licensees to participate through their website and social media accounts.

Invitations to participate in the policy intentions consultation were also sent to various industry groups, including BCREA, the Professional Association of Managing Agents (**PAMA**), Strata Property Agents of BC (**SPABC**), the Real Estate Brokers Association of BC (**REBA**) and Landlord BC. All local real estate boards were also invited to participate in the public consultation. During the consultation period, OSRE received a joint written submission from BCREA and the 11 real estate boards as well as a handful of email submissions from individual licensees.

The primary source of public feedback on the proposed rules was an online survey. OSRE and RECBC received a total of 356 survey responses during the 7-week consultation period. Individual survey

responses were anonymous and all responses are confidential. The survey questions focused on gathering public and licensee feedback on the policy proposals provided in the discussion paper.

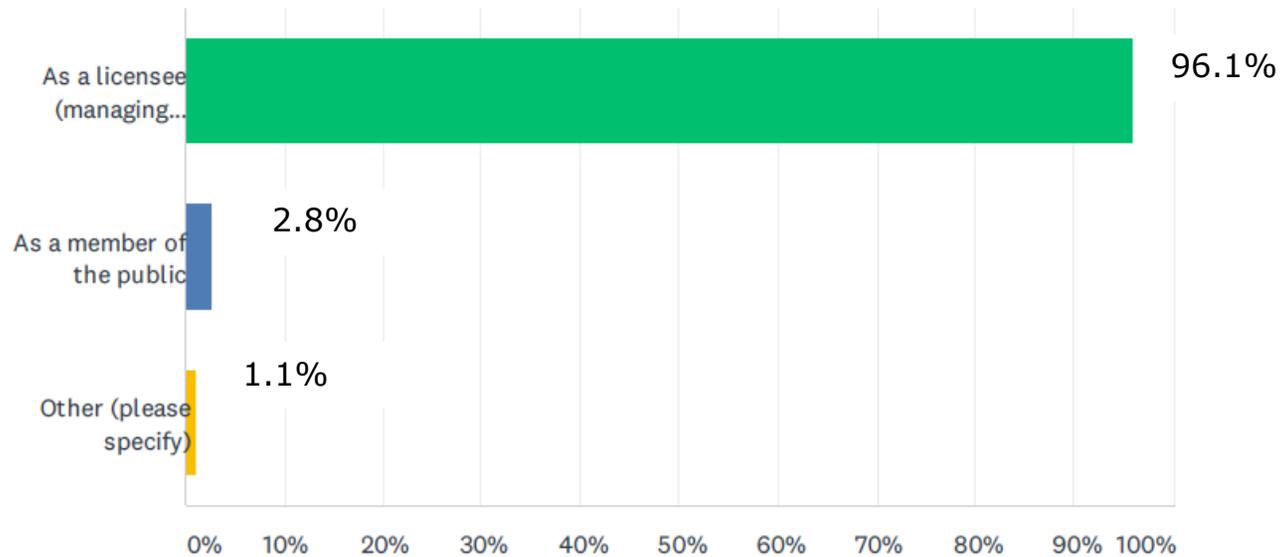
The survey included 17 questions, as follows:

- Five questions were included to obtain demographic information about respondents;
- Three questions related to the proposal to define “teams” in the Rules. Two questions asked respondents for free-text comments about the proposed definition and its potential consequences. A third question provided an opportunity to share other general comments regarding a regulatory definition of teams;
- Two questions related to requiring all teams to register with the regulator. One question asked respondents for free-text comments about the duration of the transition period for teams to come into compliance with the proposed change to registration requirements. The second question provided an opportunity to share other general comments regarding team registration;
- Three questions related to reserving the term “teams” only for use by teams. One question asked respondents for free-text comments on terms which should be reserved for teams only and for brokerages only. The second question provided an opportunity to share other general comments regarding reserved terms; and
- Two questions related to enhancing managing broker and brokerage oversight of teams. One question asked respondents for free-text comments about the role for managing brokers in approving the creation of teams or team membership. The second question provided an opportunity to share other general comments regarding oversight of teams; and
- Two free-text questions were included at the end of the survey where respondents could provide any other general comments not addressed elsewhere in the survey.

Appendix B: Survey Demographics

Respondent Demographics

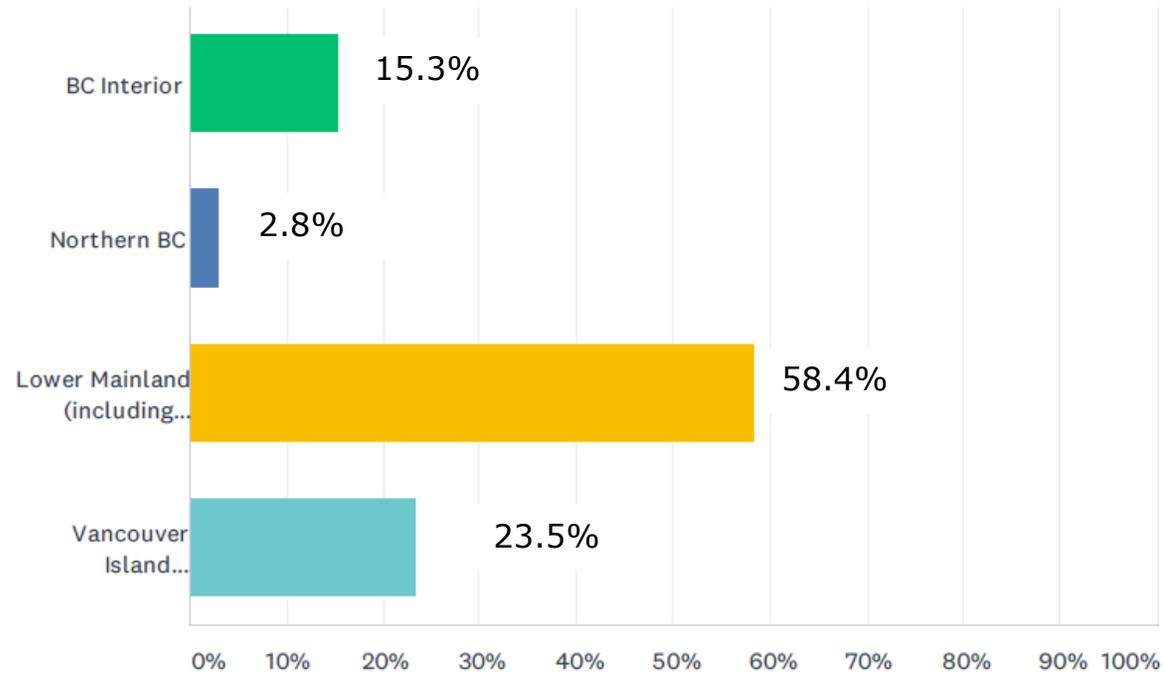
Capacity in which respondents commented on the policy proposals:



ANSWER CHOICES	RESPONSES	
As a licensee (managing broker, associate broker, representative)	96.07%	342
As a member of the public	2.81%	10
Other (please specify)	1.12%	4
TOTAL		356

Respondent Demographics

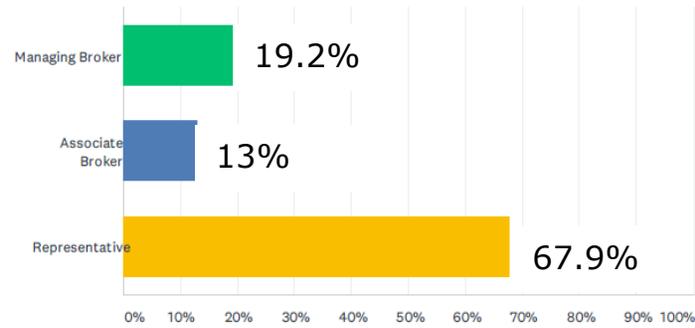
Region of the province that best describes where survey respondents live/work:



ANSWER CHOICES	RESPONSES	
BC Interior	15.30%	54
Northern BC	2.83%	10
Lower Mainland (including Metro Vancouver, Fraser Valley, Sunshine Coast and Sea-to-Sky Region)	58.36%	206
Vancouver Island (including the Gulf Islands)	23.51%	83
TOTAL		353

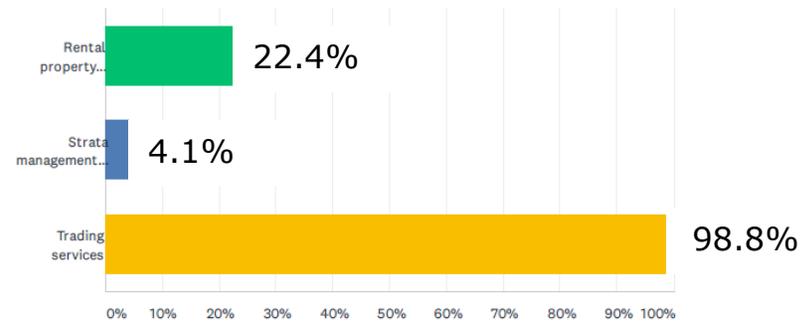
Licensee Demographics

Level of licence held by licensee survey respondents:



ANSWER CHOICES	RESPONSES	
Managing Broker	19.17%	65
Associate Broker	12.98%	44
Representative	67.85%	230
TOTAL		339

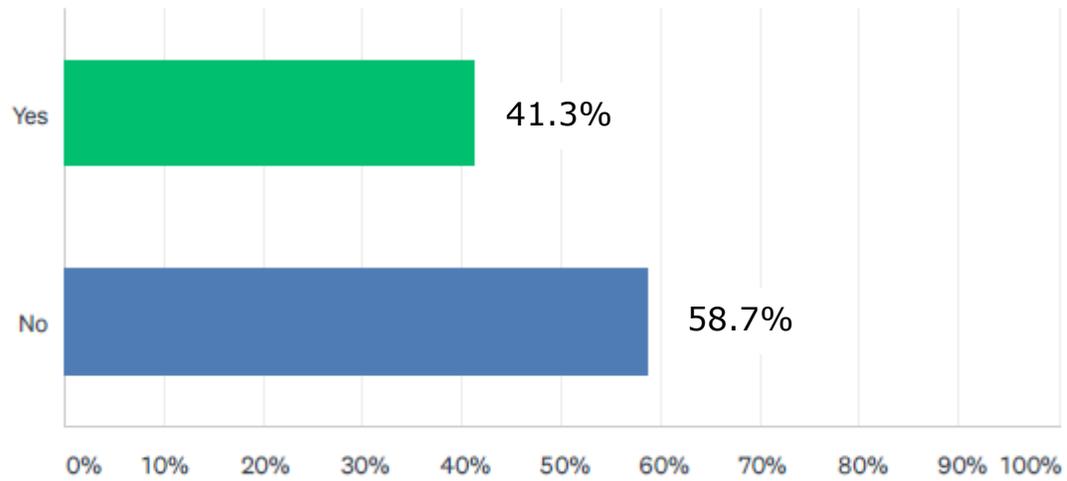
Category of licence held by licensee survey respondents:



ANSWER CHOICES	RESPONSES	
Rental property management services	22.42%	76
Strata management services	4.13%	14
Trading services	98.82%	335
Total Respondents: 339		

Licensee Demographics

Self-reported team membership by licensee survey respondents:



ANSWER CHOICES	RESPONSES	
Yes	41.30%	140
No	58.70%	199
TOTAL		339