



HOUSING TRANSACTIONS DATA PORTAL (DOM): THEORETICAL ASPECTS AND POSSIBILITIES FOR PRACTICAL IMPLEMENTATION

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Abstract

This study aims to describe the government's concept for creating the Housing Transactions Data Portal (DOM), designed to present statistics on transaction prices in the housing market. The Ministry of Development and Technology proposed the portal, which is to be operated by the Insurance Guarantee Fund through an IT system. This is an innovative solution in the national housing market, with a nationwide scope, that will expand the bargaining power of homebuyers (thus aligning with the broader protection of financial consumer services and acting as a tool for safeguarding homebuyers). At the same time, this database will enable public authorities to conduct real-time analyses of the housing market, including assessing the impact of housing support instruments on the market. The considerations in this article focus on analyzing the potential benefits and possible problematic areas related to the implementation of the DOM portal.

**PORTAL DANYCH O OBROcie MIESZKANIAMi (DOM):
ASPEKTY TEORETYCZNE I MOŻLIWOŚCI PRAKTYCZNEGO WDROŻENIA**

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Słowa kluczowe: ochrona nabywcy nieruchomości mieszkaniowej, statystyki cen transakcyjnych mieszkań, rynek mieszkaniowy, bazy danych, ceny nieruchomości mieszkaniowych.

A b s t r a k t

W opracowaniu opisano rządową koncepcję utworzenia portalu danych o transakcjach mieszkaniowych (DOM), mającego prezentować statystyki dotyczące cen transakcyjnych na rynku mieszkaniowym. Ministerstwo Rozwoju i Technologii zaproponowało portal, który ma być obsługiwany przez Ubezpieczeniowy Fundusz Gwarancyjny za pośrednictwem systemu informatycznego. Jest to innowacyjne rozwiązanie na krajowym rynku mieszkaniowym, o zasięgu ogólnopolskim, które zwiększy siłę przetargową nabywców mieszkań (wpisując się tym samym w szerszą ochronę finansowych usług konsumenckich i działając jako narzędzie ochrony nabywców mieszkań). Jednocześnie baza ta umożliwi organom publicznym przeprowadzanie analiz rynku mieszkaniowego w czasie rzeczywistym, w tym ocenę wpływu instrumentów wsparcia mieszkaniowego na rynek. Rozważania w artykule koncentrują się na analizie potencjalnych korzyści i obszarów problematycznych związanych z wdrożeniem portalu DOM.

List of Abbreviations

CSO	– Central Statistical Office
DFG	– Developer Guarantee Fund
DOM	– Housing Transactions Data Portal
EPC	– Electronic Property Card
FSC	– Financial Supervision Commission
IGF	– Insurance Guarantee Fund
MDT	– Ministry of Development and Technology
NBP	– National Bank of Poland
NTA	– National Tax Administration
OCCP	– Office of Competition and Consumer Protection
PBA	– Polish Bank Association
Record	– Developer Guarantee Fund Registry
REPR	– Real Estate Price Register
SIM	– Social Housing Initiative

Introduction

For most Poles, purchasing residential property is one of the most important financial decisions they make in their lives. The real estate market in Poland struggles with persistent imbalances (Kucharska-Stasiak, 2016), cyclical price increases (Główka, 2018), and the absence of publicly accessible databases providing information on the market's condition. Access to information in the housing real estate market is one of the key factors determining its development, influencing market equilibrium and price levels. As J. Brzezicka notes, the real estate market is characterized by insufficient availability of information, information asymmetry, and difficulties in data accessibility (Brzezicka, 2021).

In response to these problems, the Ministry of Development and Technology (MDT) developed the concept for creating the nationwide Housing Transactions Data Portal (DOM). The portal will be launched based on an amendment to the Act of May 20, 2021, on the Protection of Homebuyers of Residential Units or Single-Family Homes and the Developer Guarantee Fund (Journal of Laws 2024, item 695). The amendment draft has already been submitted for public consultations, reviews, and inter-ministerial agreements, and it has been published on the Government Legislation Centre website (Projekt ustawy o zmianie ustawy o ochronie praw..., 2024). This portal will present transaction price statistics for the housing market. The primary solutions included in the legislative draft involve establishing the DOM portal, defining the catalog of data and information collected for the portal, determining the processing of this information, and specifying the principles for accessing the statistics.

The primary objective of this article is to present the assumptions behind the operation of the Housing Transactions Data Portal (DOM) as an innovation in the national housing real estate market. The considerations focus on analyzing potential benefits and identifying possible problematic areas related to the implementation of the DOM portal. The article sets out the following specific goals:

1. What is the purpose of the DOM portal, its basic conceptual assumptions, and its target groups?
2. Determining the sources of information feeding the database and defining the functionality of the data.
3. Assessing the opportunities, threats, and risks associated with the operation of the discussed instrument, along with an attempt to estimate the effectiveness of government actions in housing policy after the project's implementation.

The research methodology used in this study includes a review of the subject literature and national legislation, including documents in the legislative pipeline, such as the draft and explanatory memorandum to the Act on the Protection of Homebuyers of Residential Units or Single-Family Homes.

Legal Foundations for the Creation of the DOM Portal

The Housing Transactions Data Portal (DOM) will be launched based on the amendment to the Act of May 20, 2021, on the Protection of Homebuyers of Residential Units or Single-Family Homes, the Developer Guarantee Fund, and Certain Other Acts (Journal of Laws 2024, item 695)¹. The provisions will enter into force, with exceptions, 20 months after the amendment's publication. Currently, the draft act is undergoing external consultations.

The concept of universal and free access to the Housing Transactions Data Portal (DOM) fits into the broader idea of protecting homebuyers of residential real estate, initiated with the enactment of the Developer Act (Act of May 21, 2022, on the Protection of Homebuyers of Residential Units or Single-Family Homes and the Developer Guarantee Fund, consolidated text: Journal of Laws 2024, item 695). Additionally, it aligns with constitutional provisions and citizens' rights to satisfy housing needs and consumer protection against unfair market practices.

In accordance with Article 75(1) of the Constitution of the Republic of Poland, public authorities conduct policies aimed at meeting citizens' housing needs, particularly combating homelessness, supporting the development of social housing, and promoting citizen initiatives to acquire their own housing. Furthermore, Article 76 of the Constitution stipulates that public authorities protect consumers, users, and tenants from actions threatening their health, privacy, and safety, as well as from unfair market practices (Constitution of the Republic of Poland of 2 April 1997).

The concept of implementing the DOM portal increases the protection of residential real estate buyers and complements earlier measures undertaken by the national legislator. Notably, since July 1, 2022, thanks to the Developer Guarantee Fund (DGF)², buyers of homes and apartments in the primary market have gained effective protection of their interests. The DGF guarantees the reimbursement of all invested funds, both in cases of developer bankruptcy and bank insolvency regarding the escrow accounts where clients' funds are deposited. The legal changes leading to the establishment of the DGF were

¹ This Act amends the following legal acts: the Act of 6 July 1982 on land and mortgage registers, the Act of 14 February 1991 – Notary Public Law, the Act of 29 August 1997 – Tax Ordinance, the Act of 22 May 2003 on compulsory insurance, the Insurance Guarantee Fund and the Polish Motor Insurers' Bureau, and the Act of 1 March 2018 on the prevention of money laundering and the financing of terrorism.

² The DGF was established by the Act of 20 May 2021 on the protection of the rights of the purchaser of a dwelling or a detached house and the Developer Guarantee Fund, Journal of Laws, i.e. 2024, item 695. The DGF collects and processes a range of data provided by banks and developers on concluded development contracts, the related housing trust accounts (MRPs), payments and withdrawals from these accounts and the history of changes made to the contracts. From 1 July, full protection for buyers of houses and flats from the primary market (mb, aleBank.pl, 2022).

initiated by the Office of Competition and Consumer Protection (OCCP), with the fund being managed by the Insurance Guarantee Fund (IGF).

As B. Gliniecki (2022) emphasizes, the Developer Act extended the scope of protection for homebuyers in the primary residential real estate market and culminated years of OCCP's efforts to strengthen the rights of buyers of residential units and single-family homes. It is worth noting that legal issues related to developer agreements had been of interest to the OCCP President since at least 2003 and to the Commissioner for Human Rights since at least 2007 (Jurczyński, 2022).

Considering the above, the DOM portal thus fulfills the state's constitutional obligations to its citizens and meets OCCP's requirements while strengthening the bargaining position and ensuring the protection of homebuyers in Poland.

Objectives, Conceptual Assumptions, and Target Groups of the DOM Portal

As envisioned by its proponent, the Ministry of Development and Technology (MDT), the main purpose of the Housing Transactions Data Portal (DOM) is to strengthen the bargaining position of individuals purchasing residential properties. Additionally, the portal is intended to serve as a tool to assist public institutions responsible for supporting housing policy.

It is worth emphasizing that the operation of the DOM Portal has been entrusted to the Insurance Guarantee Fund (IGF) due to its existing management of another instrument for protecting homebuyers – the Developer Guarantee Fund Registry (hereinafter referred to as the “Record”)³. This entity already has established automated communication channels with professional entities (developers, banks) reporting transaction data. Expanding the range of data collected for the Registry will be quicker and more cost-effective than building a new system from scratch (Krupa-Dąbrowska, 2024). Data and information collected within the Record will partially support the DOM portal, which will disclose average transaction prices of residential units and single-family homes. Developers, the primary source of information on transactions in the primary market, already have automated communication channels for feeding the Record. To cover the entire primary market, data obtained from the Record will be supplemented by information provided by other professional entities. Additional data from both the primary and secondary markets will be supplied by the National Tax Administration (NTA), which collects transaction data for tax

³ On the basis of the amended Act of 20 May 2021 on the protection of the rights of the purchaser of a dwelling or a detached house and the Developer Guarantee Fund.

purposes and for combating money laundering and terrorist financing. Utilizing existing structures and databases is considered a reasonable approach⁴.

The legislative draft specifies central institutions exclusively as the entities responsible for housing policy. According to the draft law, the IGF will generate or process information and make it available to the following entities: The Prime Minister, The Minister responsible for construction, planning, spatial development, and housing, The Minister responsible for internal affairs, The Minister responsible for public finances, The Head of the National Tax Administration, Heads of regional tax chambers, heads of tax offices, or customs-tax offices, The President of the Office of Competition and Consumer Protection (OCCP), The President of the National Bank of Poland (NBP), and The President of the Central Statistical Office (CSO).

These entities will use the information to fulfil their statutory duties within housing policy frameworks (Article 1, point 6 of the draft amendment, Article 56d, point 1). According to the draft law, information will be generated or processed and provided in a format that prevents the identification of individuals or specific properties. As noted above, the data passed to CSO and NBP will already be anonymized and statistically processed, which may complicate integration with existing statistics and analyses prepared by these entities.

Of greater concern is the exclusion of municipalities and cities from the list of entities that may access data, reports, or analyses. Local governments are also responsible for meeting the housing needs of their communities and may take actions such as building homes within SIM (Social Housing Initiative) frameworks or implementing spatial policies if they identify problems with meeting local demand. Legislative measures are only one aspect of housing policy implemented by local governments, often in collaboration with central institutions. If the DOM Portal is intended to monitor housing policy instruments, local governments should also have access to the analyses.

The division proposed in this draft, where central offices rely on data from one source while local governments, courts, and the banking system rely on different data, does not contribute to greater transparency in the housing market.

Additionally, the regulation does not foresee access to data, even anonymized for specific research purposes, for scientific studies, analyses, and comparisons at various levels, including international ones. Scientific research often serves as the first step in introducing housing policy instruments. Collaborating with research institutions on the DOM Portal, not only at the level of publicly available reports but also through access to underlying data, could be invaluable for housing policy at both central and local levels. The scientific purposes are mentioned in the explanatory memorandum to the draft law.

⁴ Explanatory Memorandum to the Draft Law on Amendments to the Law on the Protection of the Rights of the Purchaser of a Dwelling or Single-Family House and the Developer Guarantee Fund and Certain Other Laws, Ministry of Development and Technology, Draft of 9 September 2024, p. 4.

Improving housing monitoring in Poland is in the public interest and thus benefits the government, local governments, non-governmental organizations, scientific and market communities, and all citizens who wish to base their housing decisions on reliable information sources (Milewska-Wilk & Nowak, 2022).

The real estate market functions with the active participation of many stakeholders, all of whom play equally important roles. One such stakeholder is the notary, whose involvement is indispensable for real estate transactions (Gołabeska (ed.), 2024). Notaries, as public officials overseeing the execution of real estate purchase and sale transactions, will be a key element in feeding the database. This raises the question of whether notaries in Poland are prepared for such detailed descriptions of transactions and the daily feeding of the database with completed transactions.

In this context, it is worth considering the Polish Bank Association's (PBA) repeatedly proposed introduction of the Electronic Property Card (EPC). PBA submitted this proposal in early August 2024, in the context of the public consultation on the DOM Portal project, to three ministries – the Ministry of Development and Technology, the Ministry of Digital Affairs, and the Ministry of Justice.

According to PBA, creating the DOM Portal to present actual property prices is a step toward greater transparency in the real estate market. Unfortunately, the DOM Portal is designed for individual buyers, who purchase residential properties relatively infrequently. The project targets no more than 200,000 potential individual buyers per year. Given the significant effort and financial resources invested, it seems reasonable to enable the banking sector to utilize data collected in the DOM Portal, for instance, through an external (interbank) real estate database, as referenced in Recommendation by the Financial Supervision Commission on the principles of gathering and processing real estate data by banks. The AMRON system is an example of such a database, used by over 600 entities active in the real estate market, including 25 major commercial banks, 391 cooperative banks, as well as the National Bank of Poland, the Financial Supervision Authority, the National Prosecutor's Office, and the police. Establishing a framework for cooperation with banks to access data (e.g., via API connections) should be considered, especially given that banks are expected to contribute data to the system.

Utilizing existing information sources, such as data from the DFG and information collected by the NTA (via forms completed by notaries), is a good solution. However, a significant breakthrough would be the standardization of data describing properties involved in purchase transactions. As previously noted, PBA recommends revisiting discussions on implementing the EPC, which should be annexed to notarial deeds for real estate purchases. The scope of data collected in the EPC would significantly expand the list of characteristics and attributes of the property, allowing for transaction price verification, including technical condition and energy efficiency attributes.

By implementing the EPC, notarial deeds submitted to tax offices, county geodetic and cartographic documentation centers, and the land registry divisions of district courts could include a standardized and unified set of basic information about the properties involved in transactions. This would enable complete identification of transactions in the real estate market and eliminate the risk of errors in public registries caused by manual data entry in various public administration units.

Considering the above, introducing the EPC into the Polish legal framework should be deemed both necessary and fully justified.

It is worth pointing out at this point that there are other property databases in Poland. These include, among others, a few land registers, geoportals and all kinds of records, registers and lists, which are maintained by both public and private sector entities. Access to these is often difficult or chargeable.

The primary source of information holding data on the legal status of real estate is the Land and Mortgage Register⁵. Land and mortgage registers are maintained to ensure the security of property transactions. It is an established register to establish the rights in rem in real property. Land and Mortgage Registers are maintained for individual real properties regardless of any changes concerning the owner (Zaremba, 2009).

The Land and Building Register⁶ is maintained by starosties, which means that, in effect, there are 380 units in Poland responsible for maintaining this database. The data, and in particular the data on registered parcels, are the basic reference data for the presentation of various other objects collected in spatial databases.

It should be noted that the above-mentioned sources of property data are detailed as to the property, not publicly available and intended for a different purpose as in the DOM Data Portal.

Mention should also be made of the operation in Poland of the Register of Real Estate Prices and Values⁷, maintained by the Land and Building Register Departments in the county offices. This is a public register which contains data on real estate prices specified in notarial deeds and on real estate values specified by property valuers in appraisal reports, extracts of which are submitted to the Land and Building Register. These registers are appropriate for market analysis, but their main disadvantage is that they are chargeable and the database is incomplete (e.g. cooperative ownership of premises is not shown).

J. Zyga (2018) pointed out a number of flaws in the functioning of the Polish Register of Real Estate Prices and Values. In his research, he has shown that the contents of the real estate price and value register currently operating in

⁵ In polish: Księgi Wieczyste.

⁶ In polish: Ewidencja gruntów i budynków.

⁷ In polish: Polski Rejestr Cen i Wartości Nieruchomości.

Poland cannot be used as an independent information basis for property valuation in accordance with the requirements of the Real Estate Management Act.

In addition, there are public real estate databases, run by the National Bank of Poland and the Central Statistical Office. Their disadvantage, however, is the fact that the data they obtain are general and the data they contain are aggregated and averaged.

In response to the lack of access to a public and free register of residential property transaction prices in Poland, real estate listing data is used. There are a number of advertising portals, e.g. *nieruchomości-online*, *otodom*, *morizon*, operating as databases of residential property prices, which present data subject to errors that reduce the transparency of the residential property market. All of these databases contain price data, but present either a different type of data, or the acquisition of this data is paid for, or the data is averaged, or scattered, or outdated. This justifies the creation of the DOM portal in Poland, given the lack of free access to the public to a portal of transaction price data on a micro level (to a specific property and not to an average value).

The analysis of shortcomings in the existing system of collecting, acquiring and presenting institutional information on transactional prices of residential real estate in Poland predestines the implementation of the DOM portal to be recommended.

Sources of Information Feeding the Database

The DOM Portal will be based on the following data and information sources derived from notarial deeds: primary market data on agreements for residential units and single-family homes subject to the requirement of maintaining housing escrow accounts, obtained from professional entities obligated to report data to the Developer Guarantee Fund Registry (hereinafter referred to as the “Record”); primary market data on sales agreements for residential properties not subject to the housing escrow account requirement, obtained from professional entities not obligated to report data to the Registry; and primary and secondary market data provided by the Head of the National Tax Administration (NTA) based on information from notarial deeds submitted by notaries⁸.

The operation of the DOM Portal aims to increase the transparency of the housing real estate market and provide essential information for implementing state housing policy and parameterizing housing support instruments. It should be noted that, to date, Poland has lacked tools to verify the effectiveness

⁸ Regulatory Impact Assessment of the draft Act on amending the Act on the protection of the rights of the purchaser of a dwelling or a single-family house and the Developer Guarantee Fund and some other acts, Ministry of Development and Technology.09.09.2024, No. in the list of legislative and programme works of the Council of Ministers: UD110.

of government housing programs. Furthermore, the absence of universal and free access to up-to-date and reliable information on transaction prices in the housing market makes it challenging for individuals intending to purchase a home or single-family house to understand actual market prices.

The collected data and information will enable the presentation of statistical data in territorial, temporal, and categorical dimensions, allowing individuals interested in purchasing a residential property to evaluate housing prices in a specific area and time frame. This will facilitate selecting the most advantageous offer among those available to them⁹.

This issue is particularly significant from the perspective of real estate market practices. Given current economic conditions, it seems that this aspect has not yet been thoroughly examined from the perspective of residential unit or single-family home buyers.

This issue also corresponds to the broader challenge of accessing universal and free data on the housing market in selected EU countries. It is worth noting that such information, reflecting the state of the housing market, including transaction volumes and real (transactional) property prices, is publicly available in countries with developed real estate markets. Spain, for instance, provides very detailed market analyses. Another example is Ireland's Residential Property Price Register, maintained by the Property Services Regulatory Authority (PSRA) under Section 86 of the Property Services (Regulation) Act of 2011. This register includes the date of sale, price, and address of all residential properties sold in Ireland since January 1, 2010, as reported to the Revenue Commissioners for stamp duty purposes.

It is important to emphasize that the Residential Property Price Register should not be considered a "Property Price Index" (Explanatory Memorandum to the Draft Amendment, 2024). A key argument for implementing the DOM Portal is the need to present transactional property prices rather than asking prices. As R. Trojanek (2007) highlights, transactional property prices are the most reliable indicator of the market value of a property, and in countries with advanced real estate market monitoring systems, this data is readily accessible.

I. Dittmann (2013) conducted research on the formation of transactional and asking prices in the primary and secondary housing markets of selected Polish cities. According to her findings, average transactional prices were generally lower than asking prices, and average prices in the secondary market were lower than in the primary market. However, there were cities where these relationships were reversed.

⁹ Detailed Explanatory Memorandum of the proposed solutions – Draft Act on amending the Act on the protection of the rights of the purchaser of a dwelling or a detached house and the Developer Guarantee Fund and certain other acts, Ministry of Development and Technology, Draft of 9 September 2024, p. 12.

Assessment of Opportunities, Threats, and Risks Associated with the Functioning of the Proposed Instrument

The proposal to establish the DOM Portal constitutes a significant innovation in the national housing real estate market. On one hand, it will expand the negotiation opportunities for homebuyers, contributing to broader financial consumer protection. On the other hand, it will enable public authorities to conduct ongoing analyses of the housing market, including evaluating the impact of housing support instruments on this market. The portal is intended to provide essential information for state housing policy and the parameterization of housing support measures.

Attention must be drawn to the increasing requirements of supervisory authorities in Poland regarding data collection, particularly the necessity for banks to supply real estate data. The growing importance of mortgage loans and the increasing share of these products in banks' portfolios highlight the clear need for reliable information to conduct analyses, ensure high-quality collateral, and address other critical credit parameters. Over the years, successive versions of Recommendation J have emphasized the importance of banks contributing to high-quality interbank databases alongside their internal systems. The DOM database is expected to meet the banking sector's needs in this regard.

A significant conceptual flaw of the DOM Portal, however, is its omission of data on the technical condition of properties, including key details such as:

- the date the building was commissioned for use. Data in the Developer Guarantee Fund Registry predominantly relates to newly built investments. As data is sourced more broadly from other professional entities and the Head of the National Tax Administration (NTA), the properties in question will become increasingly diverse. This will complicate the distinction between primary and secondary markets, which in CSO statistics currently relies on whether the seller is a private individual (secondary market) or another entity (primary market). A more effective solution would be to record the building's commissioning date, linked to applicable technical standards, as this significantly impacts property prices, especially for homes requiring substantial renovation. This information is particularly critical for real estate insurers;

- another key omission is the lack of integration with energy performance certificates. These documents are mandatory for real estate transactions, and since April 28, 2023, digital versions are stored in a dedicated registry, which also includes the building's commissioning date. Linking this registry to the DOM database could fill gaps regarding the age and technical condition of buildings. This is especially relevant for properties subject to heritage protection. The connection between building standards and price often hinges on energy efficiency, with the need for improvements translating into measurable costs.

From a housing policy perspective, the IGF, as the administrator of the DOM database, generates or processes information and makes it available to specific entities for the execution of statutory tasks aimed at meeting citizens' housing needs. These entities include the Prime Minister, the minister responsible for construction, planning, spatial development, and housing; the minister responsible for internal affairs; the minister responsible for public finances; the Head of the National Tax Administration; heads of regional tax chambers; tax and customs office directors; the President of the Office of Competition and Consumer Protection (OCCP); the President of the National Bank of Poland (NBP); and the President of the Central Statistical Office (CSO) (art. 56d(1) Projekt ustawy o zmianie ustawy o ochronie praw..., 2024). Importantly, the legislature has stipulated that the information (referred to in Article 56a(2)(2) Projekt ustawy o zmianie ustawy o ochronie praw..., 2024) is generated or processed and shared in a format that prevents the identification of individuals or specific properties.

Regarding the security of individual data collected in the portal, the legislative proponent assures that such data will be protected under personal data and tax confidentiality regulations. The IGF and its employees may use this data exclusively for tasks defined by the law¹⁰. The categories of information and data collected for the DOM Portal include: the date of the developer agreement and identifiers for ownership transfer agreements, the real estate land and mortgage register number, property address, type of property (apartment/single-family home), price, usable area, number of rooms, floor, in some cases, the total number of floors in the building, and basic buyer identification data (e.g., PESEL). The inclusion of PESEL numbers for residential property owners has raised the most significant controversy. Despite assurances that access to sensitive data will be limited to a strictly defined group of government institutions, concerns persist regarding personal data protection.

The legislative proponent has noted that during extensive consultations, the most frequently raised concerns included personal data protection, particularly regarding the collection of PESEL numbers and land and mortgage register numbers, additional administrative requirements imposed on developers and notaries, the scope of data collected for the DOM Portal (e.g., energy performance characteristics, transactions between legal entities), the scope of data presented within the portal (e.g., minimum transaction volume thresholds), and the financing of the DOM Portal's operations from the Developer Guarantee Fund (DGF). These issues were highlighted during a presentation by A. Polak of the Housing Department, Ministry of Development and Technology, at the Real Estate Financing Congress, October 24-25, 2024.

¹⁰ Detailed justification of the proposed solutions – Projekt ustawy o zmianie ustawy o ochronie praw... (2024, p. 18).

Assessment of the Justification for the Preparation and Implementation of the Nationwide DOM Portal

In the context of Poland's still underdeveloped real estate market, the institutional factor represented by the idea of the DOM database can significantly contribute to the development and increased transparency of the housing market in Poland.

The operation of such a database, on a broader scale, will help align residential property prices with their actual market value by presenting data on transactional prices rather than asking prices. This will improve the quality of scientific research in this area and enhance the international comparability of housing price indices.

It is essential to emphasize the critical aspect of protecting residential property buyers in Poland. Currently, individuals face challenges in accessing reliable information about housing prices and often rely primarily on data provided by market entities, especially classified ad portals and other specialized platforms (Milewska-Wilk & Nowak, 2022).

High demand for housing in Poland places developers in a stronger position compared to buyers. In situations of information asymmetry and local monopolies held by developers, homebuyers are often unaware whether the price proposed to them (individually negotiated) is an asking price or a transactional price. Similarly, potential homebuyers lack sufficient information, which limits their decision-making capabilities and may lead to a waiting stance, delaying the decision to purchase property. As J. Łaszek and K. Olszewski (2016, p. 71-91) highlight, housing is sold through individual contact with the developer, which creates conditions typical of a monopoly, allowing developers to differentiate prices based on buyer characteristics.

Another important argument for implementing the DOM Portal is its potential as a tool for shaping appropriate housing policy. Until now, government is lacking an effective instrument to verify the impact of implemented housing programs. As a result, public assistance has often been directed toward social groups with sufficient creditworthiness to purchase property at market prices. For example, the recent government housing program (named Bezpieczny Kredyt 2%) benefited young, educated individuals living in large cities who held high-ranking positions and had not previously owned a home.

In summary, the wide range of information collected by the DOM Portal is intended to enable analysis and use across various dimensions and levels. Given the above analysis of the legal situation, the academic discussion on data accessibility, and the presented justification for developing the portal, it is strongly recommended to proceed with the implementation of this concept while addressing the noted observations.

Conclusion

The study analyzed the issue at hand by utilizing selected legislation and subject literature, which allowed for the formulation of research objectives. Subsequently, the synthesis of knowledge on the examined topic, based on these sources, enabled the development and fulfillment of the stated goals. As a result of this research, final conclusions were presented.

The most important conclusion from the research is that the new legislative initiative in the form of the Housing Transactions Data Portal (DOM), which will provide Polish residential property buyers with universal and free access to transaction price statistics in the housing market, has the potential to become a highly valuable tool for real estate market participants.

While the DOM Portal, as a tool for providing information about the real estate market to individuals and other market participants, offers advantages in its current proposed form, it is selective and incomplete. By leveraging administrative and existing data sources, processing them as early as possible, enabling digital transmission, and adhering to interoperability principles, it can deliver reliable data quickly. However, it will not cover parts of the market where buyers are legal entities.

For monitoring the effectiveness of housing policy tools, the portal will not be a comprehensive instrument, as it is primarily designed to monitor prices in the developer market, supplemented by data on other transactions but lacking necessary details about older apartments and buildings. It cannot be used to monitor improvements in energy efficiency, the introduction of renewable energy sources in housing stock, or the trading of residential properties by professional entities.

The project overlooks the existing Real Estate Price Register and its functions, the role of local governments in implementing housing policy, and possible areas of collaboration with the academic sector. The rental market is still neglected, with no proposed solutions for monitoring its size, prices, or the effectiveness of implemented policies.

In conclusion, the draft amendment to the Act on the Protection of Homebuyers of Residential Units or Single-Family Homes and the Developer Guarantee Fund, as well as certain other acts, requires further consultations and the enhancement of the DOM Portal's functionalities.

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