

12 February 2019

Manager Regulatory Reporting
Data Analytics
Australian Prudential Regulation Authority
accountabilityregime@apra.gov.au

To Whom It May Concern,

Banking Executive Accountability Regime (BEAR) – Consultation on Proposed Registration Form

I refer to your letter, dated 18 December 2018, inviting comment on a draft form, *ARF 550.0 Banking Executive Accountability Regime – Registration Form (ARF 550.0)* that APRA intends ADIs to use for registering an accountable person as well as other obligations as specified under section 37F of the *Banking Act 1959*.

Thank you for the opportunity to provide feedback. The CBA welcomes any initiatives to improve the effectiveness of ADI reporting of their BEAR obligations.

The CBA is supportive of the new registration form and appreciates that the design of the new form will make it easier to make changes to multiple accountable persons at the same time.

In addition, the CBA asks APRA to consider the following feedback:

- Amending the title of the form to words similar to “...*Registration and Update Form*” to reflect the dual use of the form for the registration / deregistration of accountable persons as well as updates to accountability statements and maps.
- Including an option or field in section 1 of the form to nominate whether the accountable person is an employee of the ADI or a subsidiary.
- Providing clarity around the definition of “activity date” in section 1 of the form, specifically whether this reflects the effective date of the proposed change, or the date of submission.
- Enlarging the field “description of changes to accountability map” to enable sufficient space to describe any changes to an accountability map.

Should you wish to discuss or clarify any aspect of this letter, please do not hesitate to contact the APRA Portfolio Relationship Team.

Yours sincerely,

Trent White
Executive Manager
Banking Executive Accountability Regime
Office of the Deputy CEO
Commonwealth Bank of Australia