



5 December 2019

**TO: ALL AUTHORISED DEPOSIT-TAKING INSTITUTIONS**

**CONSULTATION ON THE CONFIDENTIALITY OF DATA USED IN ADI QUARTERLY PUBLICATIONS AND ADDITIONAL HISTORICAL DATA**

The purpose of this letter is to advise ADIs, ADI industry associations and other representatives of ADIs that APRA is proposing to determine data sources for its quarterly publications to be non-confidential and to provide an opportunity to ADIs to make submissions on these proposals.

From 2020, APRA proposes to publish:

- entity-level data specified in this consultation (that is related to current ADI quarterly publications);
- historical data series for entity level data for *all data* from reporting forms used in its ADI publications (Attachment 1) with a three-year lag from when it is given to APRA; and
- specific commentary from individual ADIs explaining material revisions to, or large movements in their data, including whether or not APRA requested the revision.

This letter also provides information about the impact on APRA's ADI quarterly publications of changes due to the cessation of some forms belonging to the Domestic Books data collection.<sup>1</sup> Some published quarterly data series are now being collected for non-consolidated domestic and foreign banks using the new Economic and Financial Statistics (EFS) collection, under section 13 of the *Financial Sector (Collection of Data) Act 2001* (FSCODA).<sup>2</sup>

**Background**

APRA currently publishes the following quarterly aggregate ADI statistical publications:

- *Quarterly Authorised Deposit-taking Institution Performance Statistics* (QADIP) provides bank, credit union and building society industry aggregate statistics, comprising data on financial performance, financial position, capital adequacy, asset quality, liquidity and key financial performance ratios.
- *Quarterly Authorised Deposit-taking Institution Property Exposures Statistics* (QPEX) provides bank, credit union and building society aggregate statistics on commercial property exposures, residential property exposures and new residential loan

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<sup>1</sup> Reporting Form ARF 320.0 *Statement of Financial Position (Domestic Books)* and Reporting Form ARF 320.8 *Housing Finance Reconciliation*.

<sup>2</sup> See [Modernised economic and financial statistics \(EFS\)](#).

approvals. APRA recently consulted the ADI industry on publishing more detailed aggregated data on residential property exposures and new housing loan approvals. These changes are due to take effect in March 2020.

The above publications are used by regulators, industry participants and analysts, researchers, policy makers and other interested parties. APRA acknowledges that by shifting to publish individual ADI data this will improve transparency of the data APRA collects, and aligns with wider government open data policies. The approach will bring the ADI industry more into line with the accessibility of data for the insurance and superannuation industries.

### **Data proposed to be determined as non-confidential**

#### *Quarterly publications*

APRA is proposing to determine as non-confidential all the individual data items sourced from the forms (i.e. reporting documents, listed in Attachment 1) used in QADIP. The proposed determination will include specific data items reported by ADIs, highlighted in Attachment 2.

APRA also proposes to determine non-confidential in their entirety the main forms used for the new version of QPEX, and similar forms in the EFS data collection, due to the significant public interest in and usage of these statistics:

- *Reporting Form ARF 223.0 Residential Mortgage Lending*
- *Reporting Form ARF 230.0 Commercial Property*
- *Reporting Form ARF 743.0 ABS/RBA Housing Finance*
- *Reporting Form ARF 744.0 ABS/RBA Housing Credit Stocks, Flows and Interest Rates (Standard/Reduced)*

The proposed non-confidentiality determination would apply to all such data from the date the ADI was required to provide the information to APRA under the relevant reporting standard. The determination will apply prospectively to data of the kind specified in the determination in reporting documents yet to be received by APRA.

All statistics will be sourced from ADIs' existing reporting. ADIs will not be required to submit any additional data to APRA to enable the proposed statistical publications.

#### *Additional historical data*

APRA is also proposing to determine as non-confidential *all remaining data* in all the ADI quarterly publication source forms listed in Attachment 1. This determination would operate on the basis that *all remaining data* would become non-confidential three years after the date the ADI was required to provide that information to APRA under the relevant reporting standard. From the second quarter of 2020, APRA intends to begin publishing at an entity level a historical data series for all these remaining data items that are sourced from the forms listed in Attachment 1, (including former versions) with a three-year lag.

#### *Commentary regarding significant movements*

APRA intends to make future requests for specific commentary explaining material movements in submitted data. This includes large month-to-month and quarter-to-quarter movements as part of the regular data collection process and material resubmissions of an entity's data.

APRA seeks the consent of entities to publish this commentary. This will improve the transparency of the data APRA collects and support informed decision-making for all market participants, consultants, analysts and other data users in relation to interpreting changes in published data. APRA also intends to publish if an entity declines to provide this commentary.

### *Publications refresh*

Publication of a number of financial statement data series will be impacted for some domestic and foreign banks, as their equivalent, although conceptually similar, are not the same as those in the EFS data collection, which is replacing the former Domestic Books data collection. A few of these EFS data items, available on a monthly basis, will also be published in *Monthly Authorised Deposit-taking Institution Performance Statistics*.

### **Non-confidentiality determination process**

Data collected by APRA under a reporting document that is required to be given to APRA under the *Financial Sector (Collection of Data) Act 2001* is protected information under section 56 of the *Australian Prudential Regulation Authority Act 1998* (APRA Act).

APRA may only disclose protected information in accordance with the APRA Act. This includes where APRA determines that all or a part of reporting document does not contain confidential information under section 57 of the APRA Act.

Before APRA determines that all or a part of reporting document does not contain confidential information, it is required to consult with ADIs, ADI industry associations and other representatives of ADIs ('the interested parties') and provide them with an opportunity to make representations as to whether or not a reporting document contains confidential information.

Please note, APRA can determine a reporting document non-confidential if, after considering responses to the consultation, it considers that the benefit to the public from the disclosure of the reporting document, outweighs any detriment to commercial interests that the disclosure may cause.

Determining that all or a part of reporting document does not contain confidential information under section 57 of the APRA Act will not affect APRA's obligations under the *Privacy Act 1998*. In the case of ADI data, APRA does not intend to disseminate any data where an individual's personal information could reasonably be identified and will withhold such data from all statistical releases.

### **Invitation**

APRA is seeking representations from all interested parties and also other market participants, analysts, academics and any other potential user of APRA statistics whether these data sources should be determined non-confidential. APRA encourages all parties to make representations and submissions on:

- details of the specific data items that should remain confidential;
- if certain data items present sensitivity issues, the time period within which these items might be regarded as no longer being confidential or sensitive;
- the impact associated with a proposal that an ADI provides commentary on material revisions to, or large period-to-period movements in, its data, for inclusion in APRA's statistical publications;

- specific information on how the disclosure of these data items and the ADI's commentary on significant movements would lead to detriment to the ADI's or other parties' commercial interests, and the extent to which that could occur;
- the demand for equivalent historical series at an entity level; and
- any other comments regarding APRA's proposal.

The proposed changes to the sources of data to be determined non-confidential for the ADI quarterly publications will be subject to a 12 week public consultation. Written submissions on the proposed changes should be sent to [dataanalytics@apra.gov.au](mailto:dataanalytics@apra.gov.au) by 28 February 2020 and addressed to Manager, Regulatory Reporting, Data Analytics, or write to:

Manager, Regulatory Reporting, Data Analytics  
Australian Prudential Regulation Authority  
GPO Box 9836  
Sydney NSW 2001

Yours sincerely,

Alison Bliss  
General Manager  
Data Analytics and Insights

#### **Important disclosure notice – publication of submissions**

All information in submissions will be made available to the public on the APRA website unless a respondent expressly requests that all or part of the submission is to remain in confidence. Automatically generated confidentiality statements in emails do not suffice for this purpose. Respondents who would like part of their submission to remain in confidence should provide this information marked as confidential in a separate attachment.

Submissions may be the subject of a request for access made under the FOIA. APRA will determine such requests, if any, in accordance with the provisions of the FOIA. Information in the submission about any APRA-regulated entity that is not in the public domain and that is identified as confidential will be protected by section 56 of the APRA Act and will therefore be exempt from production under the FOIA.

## **Attachment 1: List of forms used in ADI quarterly publications**

The data in the ADI quarterly publications are sourced from the following returns submitted to APRA under *the Financial Sector (Collection of Data) Act 2001* by ADIs.

### **Quarterly authorised deposit-taking institution performance statistics (QADIP)**

*ARF 110.0 Capital Adequacy (Level 1 and Level 2);*

*ARF 210.1A Liquidity Coverage Ratio - all currencies (Level 1 and Level 2);*

*ARF 210.1B Liquidity Coverage Ratio - AUD only (Level 1 and Level 2);*

*ARF 210.2 Minimum Liquidity Holdings Ratio (Level 1);*

*ARF 220.0 Impaired Facilities (Licensed ADI and Consolidated Group Books);*

*ARF 322.0 Statement of Financial Position (Consolidated Group Books);*

*ARF 323.0 Statement of Financial Position (Licensed ADI);*

*ARF 330.0 Statement of Financial Performance (Licensed ADI and Consolidated Group Books);*

*ARF 330.1 Interest Income and Interest Expense (Licensed ADI and Consolidated Group Books);*

*ARF 330.2 Other Operating Income (Licensed ADI and Consolidated Group Books);*

*ARF 330.3 Other Operating Expense (Licensed ADI and Consolidated Group Books);*

*ARF 720.0 ABS/RBA Statement of Financial Position (Standard/Reduced);*

*ARF 720.1 ABS/RBA Loans and Finance Leases (Standard/Reduced);*

*ARF 720.2 ABS/RBA Deposits (Standard/Reduced);*

*ARF 720.3 ABS/RBA Intra-group Assets and Liabilities; and*

*ARF 720.6 ABS/RBA Securities on issue*

Historical series for:

*ARF 110.0 Capital Adequacy (Licensed ADI and Consolidated Group Books);*

*ARF 210.0 Statement of High Quality Liquid Assets Calculation (Licensed ADI and Consolidated Group Books); and*

*ARF 320.0 Statement of Financial Position (Domestic Books)*

**Quarterly authorised deposit-taking institution property exposures statistics (QPEX)**

*ARF 223 Residential Mortgage Lending (Level 1 or Level 2)*

*ARF 230.0 Commercial Property (Licensed ADI and Consolidated Group Books)*

*ARF 743.0 ABS/RBA Housing Finance*

*ARF 744.0 ABS/RBA Housing Credit Stocks, Flows and Interest Rates (Standard/ Reduced)*

Historical series for:

*ARF 320.0 Statement of Financial Position (Domestic Books)*

*ARF 320.8 Housing Loan Reconciliation (Domestic or Licensed ADI Books)*

*ARF 323.0 Statement of Financial Position (Licensed ADI)*