

6 March 2020

Manager, Regulatory Reporting, Data Analytics Australian Prudential Regulation Authority 1 Martin Place Sydney, NSW, 2000 By email: DataAnalytics@apra.gov.au

Dear Michael,

Consultation on the confidentiality of data used in ADI quarterly publications and additional historical data

The Australian Prudential Regulation Authority (APRA) proposes that a substantial amount of data collected from ADIs on a quarterly basis be made non-confidential from the date of submission. Some non-confidential data will be published immediately from the second quarter of 2020 and a significant proportion will be published with a three-year lag.

We understand APRA's proposed approach is driven by the:

- changing expectations around data and transparency, as outlined in the Public Data Policy Statement of 2015¹ and as recommended in the APRA Capability Review,
- costs associated with maintaining confidential data, and
- benefits of researchers accessing data.

However, making some data non-confidential and available to the market could result in investor confusion & market instability, constrain competition and impinge on client privacy. Further, ADIs require time to develop governance frameworks and explanatory messages for senior executives who have responsibility for the data.

The ABA has developed a set of recommendations which, collectively, should meet APRA's objectives while avoiding these issues.

Table 1: How recommendations overcome issues associated with making data non-confidential

| | Market stability | Competition | Privacy |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------|---------|
| Publish entity-level data 12 months after ADIs have reported to the market, where the data may result in investor confusion | \checkmark | | |
| Publish entity-level data five years after ADIs have reported to the market, where the data may disclose commercial strategy | | \checkmark | |
| Keep confidential entity-level data which reveals profit & loss, margins, costs of funds, impairments and interest rates as well as data which could be used to extrapolate these | \checkmark | \checkmark | |
| Do not publish parallel run or best endeavour basis return submissions | \checkmark | | |
| Make aggregated data non-confidential and published except where only one ADI makes up most of the balance within one cell | \checkmark | \checkmark | |
| Conduct an exercise to ensure the conformity of all data available to the market | \checkmark | | |

¹¹ Office of Prime Minister & Cabinet (2015), Australian Government Public Data Policy Statement, Australian Government, https://www.pmc.gov.au/sites/default/files/publications/aust_govt_public_data_policy_statement_1.pdf



| | Market stability | Competition | Privacy |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------|--------------|
| Do not publish cells with a value less than \$20m and/or with three or less facilities, and to involve industry in consultation to any changes to this threshold | | | \checkmark |
| Do not publish commentary on movements | \checkmark | \checkmark | \checkmark |

Implementation recommendations

APRA should not make <u>any</u> entity-level data non-confidential until the issues raised in this submission have been resolved. This is because data which is deemed non-confidential is subject to freedom of information requests and could be made available to the public within 30 days of reporting. To meet APRA's objectives in the short term, aggregated data could be made non-confidential and published.

Changes should be implemented over a 24-month timeline which include a more encompassing consultation process including consideration of alternative approaches to meeting APRA's objectives. The current proposed approach requires a binary determination of data as non-confidential or confidential to be consistent with the *APRA Act*. Other options are possible but may require legislative reform.

Finally, before implementation, APRA should clearly explain demand for, and usage of, entity level data by identifying the users and how they intend to use the data. APRA could then tailor data access to the needs of intended users, rather than making commercially sensitive data available to market competitors. This would ensure the benefits of any changes are fully realised with minimal disruption to current market reporting disclosures and practices.

Attachments

To aid APRA's determination of non-confidentiality for QPEX returns, please find attached to this document ARFs 223.0, 230.0, 743.0 and 744.0 with each cell colour coded according to the below legend. Given the level of sensitivity of some data items in QADIP we suggest APRA undertake a longer exercise to identify industry consensus on non-confidentiality on the QADIP returns. In the interim no QADIP returns should be made non-confidential or published.

 Non-confidential on submission

 Non-confidential 12 months after ADIs have published data to market

 Non-confidential 5 years after ADIs have published data to market

 Confidential at all times and should not be published on an entity level

Non-confidential when aggregated (except where one ADI makes up most of the balance of one cell)

Yours sincerely,



Michelle Jakubauskas Director, Research and Data Management



Appendix A. Explanation of issues and recommendations

Collectively, the recommendations in this submission are designed to meet APRA's objectives while overcoming market and operational issues associated with making data public.

Investor confusion and market instability

ADIs publicly report data twice yearly as part of their annual reporting cycle and on an ongoing basis as part of their continuous disclosure obligations. This data is used by market participants to value stock prices and make investment decisions.

Investor confidence in market disclosure is essential to maintaining market stability. Making data available to the market that does not have consistent definitions or has not been prepared for investors is likely to be confusing for investors. A large volume of new granular data without sufficient context could be misinterpreted, which may lead to investors making ill informed decisions and is inconsistent with the general obligation on companies to provide clear and concise disclosure. Confusion could result in a loss of investor confidence and may impact trading in an ADIs shares which in turn could impact the stability of the banking sector.

It is unclear if APRA has consulted with other regulators to explore how making quarterly data reported to them by ADIs non-confidential would impact on market stability. If this consultation has occurred, it would be beneficial to share the responses with industry. The sections below explain definitional and timing issues and outline the steps APRA should take before making data non-confidential at an entity level.

Definitions

Data reported by entities to the market often have different definitions to the data they report to APRA. This is partly driven by the different purposes of market and regulatory reporting. Data reported to APRA is generally for the purposes of macro-economic analysis and consequently the data reflects economic concepts. On the other hand, data reported to the market is for the purposes of financial reporting and reflects accounting concepts and standards. Economic and accounting data concepts often overlap but may not be identical.

Given the expectation that data reported by APRA will be inconsistent with data reported by entities to the market, *ADIs require time to develop explanations and provide context for these differences.* This will ensure they satisfy the requirements of the *Corporations Act s.297* (providing a true and fair view of position / performance) and ASX Listing Rule 3.1 (ensuring an informed market in listed securities). Providing time for ADIs to develop explanations and educate the market may avoid data misinterpretation and associated volatility.

Further, data reported by ADIs to APRA is not always comparable. Differences exist for all ADIs but is particularly stark for non-Australian ADIs who often have very different reporting fields which align to international standards rather than Australian standards. This is also truer of some reporting forms than others. For example, data reported in the recently introduced EFS 743/744 series may not have yet reached conformity between ADIs: FAQs are yet to be incorporated into the reporting requirements, while bilateral discussions continue and some reporting treatments have been bilaterally agreed with APRA.

To overcome definitional issues, we recommend that APRA conduct an exercise which ensures the conformity of all data available to the market. This exercise would, for example, examine each data cell and assess whether each ADI uses the same methodology and definitions. Where differences exist APRA could determine that the data remain confidential or update guidance to improve consistency. Until this takes place data which lacks consistency should remain confidential.

Timing

The proposal that data reported by ADIs to APRA is made non-confidential upon submission would result in data being available to market participants before ADIs have disclosed it directly. APRA



reporting time frames are on a quarterly basis, while most banks report twice yearly to the market. ABA members have not been able to identify any data items which could be made non-confidential upon submission.

Further, the short timeframes in which APRA requires ADIs to report to them does not provide sufficient time to put the data through the governance and approval processes typical of market disclosures. Governance arrangements required of market reporting that differ from regulatory reporting include development of commentary appropriate for market (e.g. greater emphasis on business context and relationship to other disclosures), preparation of disclosure materials (e.g. slides / MD&A) as well as preparation of FAQ's for senior executives; subsequent review/approval of additional disclosures by committees, board, investor relations and legal.

To overcome timing issues, we recommend that APRA keep entity-level data confidential until 12 months after ADIs have reported to market. A secondary benefit of this approach is that the timeframe should mean that any data revisions have taken place and that commentary on substantial movements are already in the public sphere as part of regular market disclosures.

Current market updates allow ADIs to provide context and comment on results, metrics and disclosures. Providing commentary at regulatory line item level is not flexible enough to give context which will be meaningful to market participants. Although releasing the data may achieve APRA's goal of transparency there are no clear benefits to data users. Further, questions on movements can still be directly addressed to ADIs, which would be consistent with the current approach for Pillar 3. *Consequently, ABA recommends that commentary on movements are not published by APRA*. This recommendation also overcomes competition and privacy issues where material changes result from changes to client positions or commercial strategy is revealed.

Parallel run and best endeavour basis return submissions

The returns which APRA is proposing to make non-confidential are more likely to be subject to clarification and change requiring iterations or updates. This is primarily a consideration for newly introduced returns and historical submissions. For example, parallel run EFS reports submitted to APRA should not be released.

Entity level data which makes it way to the public and later requires revision will lead to misinformed investors and data users. *To ensure user confidence of the published data we propose that APRA does not publish any returns which are received on a parallel run or best endeavours basis.*

Competition

ADIs operating in Australia are subject to rigorous competition laws. The ABA considers the publication of data exposing ADIs' commercial strategy to have the potential to lead to a lessening of competition in the Australian financial system.

Commercial strategy can be identified by revealing asset class distributions, key customer target markets, product allocations and regional concentrations. Competition issues may be disproportionately borne by smaller and regional ADIs where these ADIs service key regions or focus on a more limited range of products.

Commercial strategies are typically in place for around five years before they are altered to respond to changing consumer preferences, product development and/or the economic context. *Given this, we recommend data that could reveal commercial strategy remain confidential for five years after ADIs have published data to the market.* We believe that this approach will not disrupt competition while also alleviating the costs associated with maintaining confidentiality of data for ten years, as required under APRA's current approach.

The ABA and its members are cognisant of the benefits of data collected by APRA being available to researchers, academics, consultancies and policy makers. *To enable analysis of ADI data the ABA recommends that data be made publicly available at an aggregated level, except where only one*



ADI makes up most of the balance within one cell. This could occur soon after the data is collected, similar to APRA's quarterly insurance data releases.

Privacy

Given the level of granularity in quarterly reporting, some large movements in data can be specific to the interactions that ADIs have with individual clients. For example, movements in data may make it possible to identify regional businesses that have, or no longer have, lines of credit / loans. Again, this risk is greater for smaller and regional ADIs who are likely to have fewer clients in single cells.

As a government agency, APRA is required to comply with the *Privacy Act*. The current approach is to ensure that cells with values less than \$20m are not published. *The ABA recommends that cells with values of less than \$20m and/or with three or less facilities should remain confidential, and requests that any changes to the approach involve consultation with industry.*



Appendix B. Data item confidentiality: ARF 223.0 - Residential mortgage lending

Section A: Outstanding loans secured by residential property

- 1. Credit limits (including redrawable amounts)
 - 1.1. Term loans owner-occupied
 - 1.2. Term loans investment
 - 1.3. Term loans non-housing purposes
 - 1.4. Revolving credit
- 2. Balances in offset accounts

| Secured in Australia | Secured overseas |
|----------------------|------------------|
| -1 | -2 |
| <u>BSA027807</u> | <u>BSA027808</u> |
| <u>BSA027809</u> | |
| <u>BSA027810</u> | |
| <u>BSA027811</u> | |
| <u>BSA027812</u> | |
| <u>BSAO27813</u> | |

| Secured in Australia | Secured in Australia: Past-due or impaired |
|----------------------|--------------------------------------------|
| -1 | -2 |
| <u>BSA027814</u> | <u>BSAO27815</u> |
| <u>BSA027816</u> | <u>BSAO27817</u> |
| <u>B5A027818</u> | <u>BSA027819</u> |
| <u>B5A027820</u> | <u>BSA027821</u> |
| <u>BSA027822</u> | <u>BSA027823</u> |
| <u>BSA027824</u> | <u>BSA027825</u> |
| <u>BSA027826</u> | <u>BSA027827</u> |
| <u>BSA027828</u> | <u>BSA027829</u> |
| <u>BSA027830</u> | |
| <u>BSA027831</u> | |
| <u>BSA027832</u> | <u>BSA027833</u> |
| <u>BSA027834</u> | <u>BSA027835</u> |
| <u>BSA027836</u> | <u>BSA027837</u> |
| | |

| tation BSA027838 BSA027839 | |
|----------------------------|--|
|----------------------------|--|

3. Credit outstanding

- 3.1. Term loans owner-occupied
 - 3.1.1. of which : interest-only
 - 3.1.2. of which : third-party originated
- 3.2. Term loans investment
 - 3.2.1. of which : interest-only
 - 3.2.2. of which : third-party originated
- 3.3. Term loans non-housing purposes
 - 3.3.1. of which : interest-only
 - 3.3.2. of which : third-party originated
- 3.4. Revolving credit
 - 3.4.1. of which : third-party originated
 - 3.4.2. of which: reverse mortgages
- 3.5. Credit outstanding

3.5.1. of which: low-documentation



- 3.5.2. of which: loans to non-residents
- 3.5.3. of which: loans to SMSFs
- 3.5.4. of which: with lenders mortgage insurance
- 3.5.5. of which: loans for units or apartments
- 4. Term loans credit outstanding by vintage
 - 4.1. Loans funded <= 3 years ago
 - 4.2. Loans funded > 3 years and <= 5 years ago
 - 4.3. Loans funded > 5 years ago
- 5. New past-due or impaired loans in the quarter
- 6. Mortgagee in possession
- 7. Loans 30-89 days past-due
- 8. Loans currently subject to temporary modifications due to financial difficulty

| <u>BSAO27840</u> | <u>BSAO27841</u> |
|------------------|------------------|
| <u>BSA027842</u> | <u>BSA027843</u> |
| <u>BSA027844</u> | <u>BSAO27845</u> |
| <u>BSA027846</u> | <u>BSAO27847</u> |

| <u>BSA027850</u> | <u>BSA027851</u> |
|-------------------|------------------|
| <u>BSA027852</u> | <u>BSA027853</u> |
| <u>BSA027854</u> | <u>BSA027855</u> |
| | <u>BSA027856</u> |
| | <u>BSA027857</u> |
| <u>BSA027858</u> | <u>BSA027859</u> |
| <u>B\$A027860</u> | <u>B5A027261</u> |

| LVR<60 | 60<=LVR<80 | 80<=LVR<85 | 85<=LVR<90 | 90<=LVR<95 | LVR>=95 | Missing LVR |
|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| -1 | -2 | -3 | -4 | -5 | -6 | -7 |
| <u>BSA027862</u> | <u>BSAO27863</u> | <u>BSAO27864</u> | <u>BSAO27865</u> | <u>BSAO27866</u> | <u>BSA027867</u> | <u>BSAO27868</u> |
| <u>BSAO27869</u> | <u>BSAO27870</u> | <u>BSAO27871</u> | <u>BSAO27872</u> | <u>BSA027873</u> | <u>BSAO27874</u> | <u>BSA027875</u> |
| <u>BSA027876</u> | <u>BSA027877</u> | <u>BSAO27878</u> | <u>BSAO27879</u> | <u>BSAO27880</u> | <u>BSAO27881</u> | <u>BSAO27882</u> |
| <u>BSA027883</u> | <u>BSAO27884</u> | <u>BSAO27885</u> | <u>BSAO27886</u> | <u>BSAO27887</u> | <u>BSAO27888</u> | <u>BSAO27889</u> |
| <u>BSA027890</u> | <u>BSAO27891</u> | <u>BSAO27892</u> | <u>BSAO27893</u> | <u>BSAO27894</u> | <u>BSAO27895</u> | <u>BSAO27896</u> |

- 9. Term loans outstanding by LVR Australia
 - 9.1. of which: owner-occupied
 - 9.2. of which : investment
 - 9.3. of which : third-party originated
 - 9.4. of which : past-due or impaired



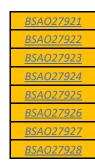
Section B: New loans funded during the quarter, secured by residential property

| Secured in | Secured | | |
|------------------|------------------|--|--|
| Australia | overseas | | |
| -1 | -2 | | |
| <u>BSAO27897</u> | <u>BSAO27898</u> | | |

10. New loans funded - total committed amount

| Owner- occupied | Investment | Non- housing purposes | Total |
|--------------------|------------------|-----------------------------|------------------|
| -1 | -2 | -3 | -4 |
| <u>BSAO27899</u> | <u>BSA027900</u> | <u>BSA027901</u> | <u>BSA027902</u> |
| <u>BSAO27903</u> | <u>BSAO27904</u> | <u>BSAO27905</u> | <u>BSAO27906</u> |
| <u>BSAO27907</u> | <u>BSA027908</u> | <u>BSA027909</u> | <u>BSAO27910</u> |
| <u>BSAO27911</u> | <u>BSA027912</u> | | |
| <u>BSAO27913</u> | <u>BSA027914</u> | | |
| <u>BSA027915</u> | <u>BSA027916</u> | | |
| <u>BSAO27917</u> | <u>BSA027918</u> | | |

- 10.1. Term loans Australia
 - 10.1.1. of which: interest-only
 - 10.1.2. of which: third-party originated
 - 10.1.3. of which : loan-to-income $\ge 4x < 6x$
 - 10.1.4. *of which* : loan-to-income >= 6x
 - 10.1.5. of which : debt-to-income $\ge 4x < 6x$
 - 10.1.6. of which : debt-to-income >= 6x
- 10.2. Revolving credit Australia
- 10.3. New loans funded total committed amount Australia
 - 10.3.1. Externally refinanced
 - 10.3.2. Loans to SMSFs
 - 10.3.3. Loans to non-residents
 - 10.3.4. With lenders mortgage insurance
 - 10.3.5. Impaired customer credit history
 - 10.3.6. Exceptions to serviceability policy
 - 10.3.7. Serviceability verification waivers
 - 10.3.8. Loans for units or apartments





- 11. New term loans funded by LVR Australia
 - 11.1. of which : owner-occupied
 - 11.2. of which : investment
 - 11.3. of which : interest-only
 - 11.4. of which : third-party originated

| LVR<60 | 60<=LVR<80 | 80<=LVR<81 | 81<=LVR<85 | 85<=LVR<90 | 90<=LVR<95 | LVR>=95 |
|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| -1 | -2 | -3 | -4 | -5 | -6 | -7 |
| <u>BSA027929</u> | <u>BSA027930</u> | <u>BSA027931</u> | <u>BSA027932</u> | <u>BSA027933</u> | <u>BSA027934</u> | <u>BSA027935</u> |
| <u>BSA027936</u> | <u>BSA027937</u> | <u>BSAO27938</u> | <u>BSA027939</u> | <u>BSA027940</u> | <u>BSA027941</u> | <u>BSA027942</u> |
| <u>BSA027943</u> | <u>BSA027944</u> | <u>BSA027945</u> | <u>BSA027946</u> | <u>BSA027947</u> | <u>BSA027948</u> | <u>BSA027949</u> |
| <u>BSA027950</u> | <u>BSA027951</u> | <u>BSA027952</u> | <u>BSA027953</u> | <u>BSA027954</u> | <u>BSA027955</u> | <u>BSA027956</u> |
| <u>BSAO27957</u> | <u>BSA027958</u> | <u>BSA027959</u> | <u>BSA027960</u> | <u>BSA027961</u> | <u>BSA027962</u> | <u>BSA027963</u> |

| Weighted |
|----------|
| average |
| -1 |

BSA027964

BSAO27965

12. Interest rates - new loans funded during the quarter - Australia

12.1. Average variable rate

- 12.2. Average loan serviceability assessment rate
- 13. Increase in credit limits for existing term loans during the quarter 13.1. *of which:* interest-only loans

Section C: Loans to private unincorporated businesses secured by residential mortgages

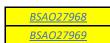
14. Loans to private unincorporated businesses - Australia

14.1. Credit outstanding

14.2. New loans funded during the quarter - total committed amount

| Amount -1 |
|------------------|
| <u>BSAO27966</u> |
| <u>BSA027967</u> |







Appendix C. Data item confidentiality: ARF 230.0 – Commercial property

Part A: COMMERCIAL PROPERTY

| | | Australia | | | |
|------------------------------|--------------------------|------------------------|---------------------|------------------------|---------------|
| | T () | T (1) (1) | Impaired Exposures | | |
| | Total exposure limits | Total actual exposures | Balance outstanding | Specific provisions | Security held |
| Office | <u>E00041</u> | <u>E01800</u> | <u>E01808</u> | <u>E01816</u> | <u>E01824</u> |
| Retail | <u>E00042</u> | <u>E01801</u> | <u>E01809</u> | <u>E01817</u> | <u>E01825</u> |
| ndustrial | <u>E00043</u> | <u>E01802</u> | <u>E01810</u> | <u>E01818</u> | <u>E01826</u> |
| and development/subdivisions | <u>E00044</u> | <u>E01803</u> | <u>E01811</u> | <u>E01819</u> | <u>E01827</u> |
| Other residential | <u>E00045</u> | <u>E01804</u> | <u>E01812</u> | <u>E01820</u> | <u>E01828</u> |
| ourism & leisure | <u>E00046</u> | <u>E01805</u> | <u>E01813</u> | <u>E01821</u> | <u>E01829</u> |
| Dther | <u>E00047</u> | <u>E01806</u> | <u>E01814</u> | <u>E01822</u> | <u>E01830</u> |
| I | <u>E00048</u> | <u>E01807</u> | <u>E01815</u> | <u>E01823</u> | <u>E01831</u> |

| | Overseas | | | | |
|-------------------------------|--------------------------|---------------------------|---------------------|------------------------|---------------|
| | Tatal | Total actual exposures | Impair | | |
| | Total exposure limits | | Balance outstanding | Specific provisions | Security held |
| Office | <u>E00049</u> | <u>E01832</u> | <u>E01840</u> | <u>E01848</u> | <u>E01856</u> |
| Retail | <u>E00050</u> | <u>E01833</u> | <u>E01841</u> | <u>E01849</u> | <u>E01857</u> |
| Industrial | <u>E00051</u> | <u>E01834</u> | <u>E01842</u> | <u>E01850</u> | <u>E01858</u> |
| Land development/subdivisions | <u>E00052</u> | <u>E01835</u> | <u>E01843</u> | <u>E01851</u> | <u>E01859</u> |
| Other residential | <u>E00053</u> | <u>E01836</u> | <u>E01844</u> | <u>E01852</u> | <u>E01860</u> |
| Tourism & leisure | <u>E00054</u> | <u>E01837</u> | <u>E01845</u> | <u>E01853</u> | <u>E01861</u> |
| Other | <u>E00055</u> | <u>E01838</u> | <u>E01846</u> | <u>E01854</u> | <u>E01862</u> |
| tal | <u>E00056</u> | <u>E01839</u> | <u>E01847</u> | <u>E01855</u> | <u>E01863</u> |

Total

Total



Part B: ADIS OWN INVESTMENT IN COMMERCIAL PROPERTY

| | | Australia | | | | |
|-------------------------------|----------------|------------------------------------|----------------------------------------------------------------|--|--|--|
| | | Write-offs during reporting period | | | | |
| | Carrying value | Written-off directly to P&L | Written-off against provisions/asset revaluation reserve | | | |
| Office | <u>E01864</u> | <u>E01872</u> | <u>E01880</u> | | | |
| Retail | <u>E01865</u> | <u>E01873</u> | <u>E01881</u> | | | |
| Industrial | <u>E01866</u> | <u>E01874</u> | <u>E01882</u> | | | |
| Land development/subdivisions | <u>E01867</u> | <u>E01875</u> | <u>E01883</u> | | | |
| Other residential | <u>E01868</u> | <u>E01876</u> | <u>E01884</u> | | | |
| Tourism & leisure | <u>E01869</u> | <u>E01877</u> | <u>E01885</u> | | | |
| Other | <u>E01870</u> | <u>E01878</u> | <u>E01886</u> | | | |
| I | <u>E01871</u> | <u>E01879</u> | <u>E01887</u> | | | |

| | Overseas | | | | |
|-------------------------------|----------------|--------------------------------|----------------------------------------------------------------|--|--|
| | | Write-offs d | uring reporting period | | |
| | Carrying value | Written-off directly to P&L | Written-off against provisions/asset revaluation reserve | | |
| Office | <u>E01888</u> | <u>E01896</u> | <u>E01904</u> | | |
| Retail | <u>E01889</u> | <u>E01897</u> | <u>E01905</u> | | |
| Industrial | <u>E01890</u> | <u>E01898</u> | <u>E01906</u> | | |
| Land development/subdivisions | <u>E01891</u> | <u>E01899</u> | <u>E01907</u> | | |
| Other residential | <u>E01892</u> | <u>E01900</u> | <u>E01908</u> | | |
| Tourism & leisure | <u>E01893</u> | <u>E01901</u> | <u>E01909</u> | | |
| Other | <u>E01894</u> | <u>E01902</u> | <u>E01910</u> | | |
| tal | <u>E01895</u> | <u>E01903</u> | <u>E01911</u> | | |

Total

Total



Appendix D. Data items confidentiality: ARF 743.0 - housing finance

New applications for housing loans 1.

| | -1 |
|-----------------------------------------------------------|------------------|
| 1.1. Applications received for housing loans by residents | <u>BSAO28468</u> |
| 1.1.1. Owner-occupied | <u>BSAO28470</u> |
| 1.1.1.1. Fixed interest rate | <u>BSAO28472</u> |
| 1.1.1.2. Variable interest rate | <u>BSAO28474</u> |
| 1.1.2. Investment | <u>BSAO28476</u> |
| 1.1.2.1. Fixed interest rate | BSAO28478 |

- 1.1.2.1. Fixed interest rate
- 1.1.2.2. Variable interest rate
- 1.2. Applications received for housing loans by non-residents

2. New borrower-accepted commitments for housing loans - by location and purpose

| Location of property | Resident loan purpose sub-class | Property purpose | Number of facilities | Value |
|-----------------------------------------|-----------------------------------------------------|---------------------|-------------------------|------------------|
| -1 | -2 | -3 | -4 | -5 |
| <u>OI14262</u> | <u>OI14263</u> | <u>0114264</u> | <u>BSAO28484</u> | <u>BSAO28485</u> |
| New South Wales | Finance for the purchase of residential land | Owner-occupied | | |
| Victoria | Finance for the construction of new dwellings | Investment | | |
| Queensland | Finance for the purchase of newly erected dwellings | | | |
| South Australia | Finance for the purchase of existing dwellings | | | |
| Western Australia | Finance for alterations, additions and repairs | | | |
| Tasmania | External refinance | | | |
| Northern Territory | Internal refinance | | | |
| Australian Capital Territory | | | | |
| Other Australian territories & overseas | | | | |

Number of

facilities -1

BSAO28480

BSAO28482

Value

-2 **BSAO28469**

BSA028471

BSA028473

BSAO28475

BSA028477

BSA028479

BSAO28481

BSAO28483

- 2.1. Total new borrower-accepted commitments for housing loans to residents
 - 2.1.1. Owner-occupied
 - 2.1.1.1. of which: Serviced by foreign-sourced income
 - 2.1.2. Investment
 - 2.1.2.1. of which: Serviced by foreign-sourced income
- 2.2. Total new borrower-accepted commitments for housing loans to non-residents
 - 2.2.1. of which: Serviced by foreign-sourced income

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| <u>BSAO28486</u> | <u>BSAO28487</u> |
|------------------|------------------|
| <u>BSAO28488</u> | <u>BSAO28489</u> |
| <u>BSAO28490</u> | <u>BSAO28491</u> |
| <u>BSAO28492</u> | <u>BSAO28493</u> |
| <u>BSAO28494</u> | <u>BSAO28495</u> |
| <u>BSAO28496</u> | <u>BSAO28497</u> |
| <u>BSAO28498</u> | <u>BSAO28499</u> |



3. New borrower-accepted commitments for housing loans to resident first-home buyers - by location

| Location of property -1 | Property purpose -2 | Number of facilities -3 | Value -4 |
|-----------------------------------------|---------------------------|-------------------------------|------------------|
| <u>OI14265</u> | <u>0I14266</u> | <u>BSAO28500</u> | <u>BSA028501</u> |
| New South Wales | Owner- occupied | | |
| Victoria | Investment | | |
| Queensland | } | - | |
| South Australia |] | | |
| Western Australia | } | | |
| Tasmania |] | | |
| Northern Territory |] | | |
| Australian Capital Territory | ļ | | |
| Other Australian territories & overseas | j | | |

3.1. Total new borrower-accepted commitments for housing loans to resident first home buyers

- 3.1.1. Owner-occupied
 - 3.1.1.1. of which: Serviced by foreign-sourced income
- 3.1.2. Investment
 - 3.1.2.1. of which: Serviced by foreign-sourced income

4. Revolving housing loans to residents

- 4.1. New borrower-accepted commitments during the month
- 4.2. Cancellations of and reductions in previously committed (and accepted) credit limits during the month
- 4.3. Total credit limits available (including credit outstanding) as at the end of the month

| <u>BSAO28502</u> | <u>BSAO28503</u> |
|------------------|------------------|
| <u>BSAO28504</u> | <u>BSAO28505</u> |
| <u>BSAO28506</u> | <u>BSAO28507</u> |
| <u>BSAO28508</u> | <u>BSAO28509</u> |
| <u>BSAO28510</u> | <u>BSAO28511</u> |

| Owner-occupied -1 | Investment -2 |
|----------------------|------------------|
| <u>BSAO28512</u> | <u>BSAO28513</u> |
| <u>BSAO28514</u> | <u>BSAO28515</u> |
| <u>BSAO28516</u> | <u>BSAO28517</u> |



5. Fixed-term housing loans to residents - stocks and flows reconciliation

- 5.1. Fixed-term housing loan credit outstanding at the end of the previous month
- 5.2. Drawdowns for new loans
- 5.3. Other drawdowns
- 5.4. Credit sold
 - 5.4.1. of which: Off-balance sheet securitised
- 5.5. Credit purchased
- 5.6. Interest charged
- 5.7. Scheduled repayments
- 5.8. Excess repayments due to discharge of loan
- 5.9. Other excess repayments
- 5.10. Repayment deficiencies
- 5.11. Net write-offs
- 5.12. Net change in opening balances due to switching between investment and owner-occupied
- 5.13. Other changes to the balance of loan credit outstanding between reporting periods
- 5.14. Fixed-term housing loan credit outstanding as at the end of the month

| Owner-occupied -1 | Investment -2 |
|----------------------|------------------|
| <u>BSAO28518</u> | <u>BSAO28519</u> |
| <u>BSAO28520</u> | <u>BSAO28521</u> |
| <u>BSAO28522</u> | <u>BSAO28523</u> |
| <u>BSAO28524</u> | <u>BSAO28525</u> |
| <u>BSAO28526</u> | <u>BSA028527</u> |
| <u>BSAO28528</u> | <u>BSA028529</u> |
| <u>BSAO28530</u> | <u>BSAO28531</u> |
| <u>BSAO28532</u> | <u>BSAO28533</u> |
| <u>BSAO28534</u> | <u>BSAO28535</u> |
| <u>BSAO28536</u> | <u>BSAO28537</u> |
| <u>BSAO28538</u> | <u>BSAO28539</u> |
| <u>BSAO28540</u> | <u>BSAO28541</u> |
| <u>BSAO28542</u> | <u>BSAO28543</u> |
| <u>BSAO28544</u> | <u>BSAO28545</u> |
| <u>BSAO28546</u> | <u>BSAO28547</u> |



6. Fixed-term housing loans outstanding to residents - offset accounts, redraw facilities and excess repayments

| 6.1. Closina | balance of offset accounts |
|--------------|----------------------------|
| 0.1.01001119 | |

6.2. Number of facilities with offset accounts

6.3. Available redraw balances

6.4. Number of facilities with redraw accounts

6.5. Stock of other excess repayments that can be used to meet future scheduled payments

6.6. Value of offset balances, available redraw balances and other excess repayments

7. Fixed-term housing loans outstanding to residents - future scheduled repayments

| Funds available to meet future repayments | Property purpose | Repayment type | Number of facilities | Average facility credit limit |
|-------------------------------------------|---------------------|-------------------|----------------------|-------------------------------------|
| -1 | -2 | -3 | -4 | -5 |
| <u>0/14267</u> | <u>0114268</u> | <u>0114269</u> | <u>BSAO28558</u> | <u>BSA028559</u> |
| >=0 to <=1 month | Owner- occupied | Amortising | | |
| >1 to <=3 months | Investment | Interest-only | | |
| >3 to <=6 months | | | | |
| >6 to <= 9 months | | | | |
| >9 to <= 12 months | | | | |
| >12 to <= 24 months | | | | |
| >24 months | | | | |

Owner-

occupied

-1 BSL22458

BSA028548

BSA028550

BSA028552

<u>BSAO28554</u>

BSAO28556

Investment

-2

<u>BSL22459</u>

BSAO28549

BSA028551

BSA028553

<u>BSAO28555</u>

BSAO28557



Appendix E. Data items confidentiality: ARF 744.0 – Housing credits, stocks, flows and interest rates

1. Housing loans outstanding

| | Number of facilities | Value (net of offset balances) | Interest rate (net of offset balances) | Value | Interest rate | Cost of funds | Margin |
|-------------------------------------------------------------------|----------------------------|-----------------------------------------|-------------------------------------------------|------------------|------------------|------------------|------------------|
| | -1 | -2 | -3 | -4 | -5 | -6 | -7 |
| 1.1. Total owner-occupied housing credit outstanding to residents | <u>BSAO28796</u> | <u>BSAO28797</u> | <u>BSAO28798</u> | <u>BSAO28799</u> | <u>BSAO28800</u> | <u>BSAO28801</u> | <u>BSAO28802</u> |
| 1.1.1. of which: Revolving credit | <u>BSA028803</u> | <u>BSAO28804</u> | <u>BSAO28805</u> | <u>BSAO28806</u> | <u>BSAO28807</u> | <u>BSAO28808</u> | <u>BSAO28809</u> |
| 1.1.2. By interest rate type | | | | | | | |
| 1.1.2.1. Fixed interest rate | <u>BSAO28810</u> | <u>BSAO28811</u> | <u>BSAO28812</u> | <u>BSAO28813</u> | <u>BSAO28814</u> | <u>BSAO28815</u> | <u>BSAO28816</u> |
| 1.1.2.2. Variable interest rate | <u>BSAO28817</u> | <u>BSAO28818</u> | <u>BSAO28819</u> | <u>BSAO28820</u> | <u>BSAO28821</u> | <u>BSAO28822</u> | <u>BSAO28823</u> |
| 1.1.3. By repayment type | | | | | | _ | |
| 1.1.3.1. Interest-only | <u>BSAO28824</u> | <u>BSAO28825</u> | <u>BSAO28826</u> | <u>BSAO28827</u> | <u>BSAO28828</u> | | |
| 1.1.3.2. Amortising | <u>BSAO28829</u> | <u>BSAO28830</u> | <u>BSAO28831</u> | <u>BSAO28832</u> | <u>BSAO28833</u> | | |
| 1.2. Total investment housing credit outstanding to residents | <u>BSAO28834</u> | <u>BSAO28835</u> | <u>BSAO28836</u> | <u>BSAO28837</u> | <u>BSAO28838</u> | <u>BSAO28839</u> | <u>BSAO28840</u> |
| 1.2.1. of which: Revolving credit | <u>BSAO28841</u> | <u>BSAO28842</u> | <u>BSAO28843</u> | <u>BSAO28844</u> | <u>BSAO28845</u> | <u>BSAO28846</u> | <u>BSAO28847</u> |
| 1.2.2. By interest rate type | | | | | | | |
| 1.2.2.1. Fixed interest rate | <u>BSAO28848</u> | <u>BSAO28849</u> | <u>BSAO28850</u> | <u>BSAO28851</u> | <u>BSAO28852</u> | <u>BSAO28853</u> | <u>BSAO28854</u> |
| 1.2.2.2. Variable interest rate | <u>BSAO28855</u> | <u>BSAO28856</u> | <u>BSAO28857</u> | <u>BSAO28858</u> | <u>BSAO28859</u> | <u>BSAO28860</u> | <u>BSAO28861</u> |
| 1.2.3. By repayment type | | | | | | | |
| 1.2.3.1. Interest-only | <u>BSAO28862</u> | <u>BSAO28863</u> | <u>BSAO28864</u> | <u>BSAO28865</u> | <u>BSAO28866</u> | | |
| 1.2.3.2. Amortising | <u>BSAO28867</u> | <u>BSAO28868</u> | <u>BSAO28869</u> | <u>BSAO28870</u> | <u>BSAO28871</u> | | |
| 1.3. Total housing credit outstanding to non-residents | <u>BSAO28872</u> | BSA028873 | <u>BSAO28874</u> | <u>BSAO28875</u> | <u>BSAO28876</u> | <u>BSAO28877</u> | <u>BSAO28878</u> |



2. Housing loans funded in the month

| | | wner-occupie | | Investment | | | | | | |
|-------------------------------------------------------------------|----------------------------|------------------|------------------|------------------|------------------|----------------------------|------------------|------------------|------------------|------------------|
| | Number of facilities | Value | Interest rate | Cost of funds | Margin | Number of facilities | Value | Interest rate | Cost of funds | Margin |
| | -1 | -2 | -3 | -4 | -5 | -6 | -7 | -8 | -9 | -10 |
| 2.1. Housing loans to residents funded in the month | <u>BSAO28879</u> | <u>BSAO28880</u> | <u>BSAO28881</u> | <u>BSAO28882</u> | <u>BSAO28883</u> | <u>BSAO28884</u> | <u>BSAO28885</u> | <u>BSAO28886</u> | <u>BSAO28887</u> | <u>BSAO28888</u> |
| 2.1.1. of which: Revolving credit | <u>BSAO28889</u> | <u>BSAO28890</u> | <u>BSAO28891</u> | <u>BSAO28892</u> | <u>BSAO28893</u> | <u>BSAO28894</u> | <u>BSAO28895</u> | <u>BSAO28896</u> | <u>BSAO28897</u> | <u>BSAO28898</u> |
| 2.1.2. of which: Finance for the construction of new dwellings | <u>BSAO28899</u> | <u>BSAO28900</u> | <u>BSAO28901</u> | | | <u>BSAO28902</u> | <u>BSAO28903</u> | <u>BSAO28904</u> | | |
| 2.1.3. By interest rate type | | | | | | | | | | |
| 2.1.3.1. Fixed interest rate | <u>BSAO28905</u> | <u>BSAO29547</u> | <u>BSAO28907</u> | <u>BSAO29548</u> | <u>BSAO28909</u> | <u>BSAO28910</u> | <u>BSAO28911</u> | <u>BSAO29549</u> | <u>BSAO28913</u> | <u>BSAO28914</u> |
| 2.1.3.1.1. of which: First-home buyers | <u>BSAO28915</u> | <u>BSAO28916</u> | <u>BSAO28917</u> | | | <u>BSAO28918</u> | <u>BSAO28919</u> | <u>BSAO28920</u> | | |
| 2.1.3.2. Variable interest rate | <u>BSAO28921</u> | <u>BSAO28922</u> | <u>BSAO28923</u> | <u>BSAO28924</u> | <u>BSAO28925</u> | <u>BSAO28926</u> | <u>BSAO28927</u> | <u>BSAO28928</u> | <u>BSAO28929</u> | <u>BSAO28930</u> |
| 2.1.3.2.1. of which: First-home buyers | <u>BSA029550</u> | <u>BSAO28932</u> | <u>BSAO28933</u> | | | <u>BSAO28934</u> | <u>BSAO28935</u> | <u>BSAO28936</u> | | |
| 2.1.4. By repayment type | | | | I | | | | | | |
| 2.1.4.1. Interest-only | BSA028937 | <u>BSA029551</u> | <u>BSAO28939</u> | | | <u>BSAO28940</u> | <u>BSAO28941</u> | <u>BSAO28942</u> | | |
| 2.1.4.2. Amortising | BSA028943 | <u>BSAO28944</u> | <u>BSAO28945</u> | | | <u>BSAO28946</u> | <u>BSAO28947</u> | <u>BSAO28948</u> | | |
| 2.2. Housing loans to non-residents funded in the month | <u>BSAO28949</u> | <u>BSAO28950</u> | <u>BSAO28951</u> | | | <u>BSAO28952</u> | <u>BSAO28953</u> | <u>BSAO28954</u> | | |



3. Housing loans to residents funded in the month – by size

| Property purpose | Value at commitment | Number of facilities | Value | Interest rate |
|------------------|-------------------------------|----------------------|------------------|------------------|
| -1 | -2 | -3 | -4 | -5 |
| <u>0114282</u> | <u>0114283</u> | <u>BSAO28955</u> | <u>BSAO28956</u> | <u>BSAO28957</u> |
| Owner-occupied | >\$0 to <=\$200,000 | | | |
| Investment | >\$200,000 to <=\$400,000 | | | |
| | >\$400,000 to <=\$600,000 | | | |
| | >\$600,000 to <=\$800,000 | | | |
| | >\$800,000 to <= \$1,000,000 | | | |
| | >\$1,000,000 to <=\$1,500,000 | | | |
| | >\$1,500,000 to <=\$2,000,000 | | | |
| | >\$2,000,000 to <=\$3,000,000 | | | |
| | >\$3,000,000 | | | |

4. Housing loans to residents funded in the month – by loan-to-valuation ratio (at commitment)

| -2 <u>0/14285</u> | -3 BSAO28958 | -4 | -5 |
|----------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <u>0114285</u> | R\$4028958 | | |
| | DJA020550 | BSA028959 | <u>BSAO28960</u> |
| <40% | | | |
| >=40% to <60% | | | |
| >=60% to <80% | | | |
| >=80% to <81% | | | |
| >=81% to <85% | | | |
| >=85% to <90% | | | |
| >=90% to <95% | | | |
| >=95% | | | |
| Unsecured | | | |
| Unknown LTV ratio | | | |
| | >=40% to <60% >=60% to <80% >=80% to <81% >=81% to <85% >=85% to <90% >=90% to <95% >=95% Unsecured | >=40% to <60% >=60% to <80% >=80% to <81% >=81% to <85% >=85% to <90% >=90% to <95% >=95% Unsecured | >=40% to <60% >=60% to <80% >=80% to <81% >=81% to <85% >=85% to <90% >=90% to <95% >=95% Unsecured |

4.1. Average LVR

SAO28961



5. Fixed interest rate housing loans to residents - by residual term

| | | Cre | Funded in the month | | | | | | |
|------------------------|------------------------------------------------|----------------------------|-----------------------------|------------------------|-----------------------------------|----------------------------------|----------------------|------------------------|------------------------------------|
| Property purpose -1 | Residual term of fixed rate period -2 | Number of facilities -3 | Value -4 | Interest rate -5 | Weighted average term -6 | Number of facilities -7 | Value -8 | Interest rate -9 | Weighted average term -10 |
| <u>OI14286</u> | <u>0114287</u> | <u>BSA029539</u> | <u>BSAO2954</u> <u>0</u> | <u>BSAO2954</u> 1 | <u>BSA02954</u> <u>2</u> | <u>BSAO2954</u> <u>3</u> | <u>BSAO2954</u> 4 | <u>BSAO2954</u> 5 | <u>BSAO2954</u> <u>6</u> |
| Owner-occupied | <=1 year | | _ | _ | _ | _ | | _ | _ |
| Investment | >1 year to <=2 years | | | | | | | | |
| | >2 years to <=3 years | | | | | | | | |
| | >3 years to <=5 years | | | | | | | | |
| | >5 years | | | | | | | | |



About the ABA

The Australian Banking Association advocates for a strong, competitive and innovative banking industry that delivers excellent and equitable outcomes for customers.

We promote and encourage policies that improve banking services for all Australians, through advocacy, research, policy expertise and thought leadership.