



DISCUSSION PAPER

Superannuation Data Transformation Project Phase 2

April 2022

Disclaimer Text

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Executive summary

Australia's superannuation system is a large, growing and significant sector within the financial system and plays an important role supporting members in retirement. In fulfilling its function, the superannuation industry manages a key financial asset for many individual Australians.

Superannuation's place in the economy and the lives of everyday Australians brings with it a heightened need for scrutiny to ensure industry participants deliver in their role. Accurate and comparable data on the superannuation industry is essential to enable appropriate regulatory oversight, transparency and accountability for registrable superannuation entity (RSE) licensees.

It is crucial that superannuation members, RSE licensees, government, regulatory agencies and other interested stakeholders have access to high quality and consistent data to assess industry performance and the outcomes delivered for superannuation members. APRA commenced the Superannuation Data Transformation (SDT) project in 2019 to address gaps in the coverage and quality of superannuation data.

As the SDT has a broad scope, APRA divided this work into three phases. Having completed Phase 1, this discussion paper is providing an opportunity for stakeholder feedback on the proposed scope, approach and timetable for introducing further enhancements to APRA's superannuation data collections under Phase 2.

Phase 1 'Breadth' addressed the most urgent data gaps required to support APRA, the industry and other stakeholders in assessing member outcomes through industry operations and performance. A key improvement for Phase 1 was to boost coverage of the data collected, particularly to include all choice products and investment options. Other areas of improvement included expense reporting, insurance arrangements, member demographics and asset allocation classifications.

Phase 2 'Depth' will explore new and better approaches to data reporting, across all areas of RSE licensee operations, including governance and risk management. Leveraging the new granular style of collections that can be reported through APRA Connect, a key outcome from Phase 2 will be to improve the granularity of the superannuation data collection. The scope for Phase 2 includes:

- Understanding the broader data needs of APRA and other stakeholders and identifying further changes to the existing data collections to meet these needs;

- Reviewing all superannuation reporting standards on Direct to APRA (D2A) against these needs, including enhancements and redesign (if needed) of reporting standards and transition of remaining reporting standards to APRA Connect; and

- Discontinuing redundant data collections, with a view to decommissioning D2A for the Superannuation industry.

APRA proposes that consultation for Phase 2 will be conducted across three consultation periods in recognition of the challenges associated with consulting on a broad range of topics and welcomes feedback on the implementation timeframe proposed below:

Proposed Phase 2 Releases	Proposed Consultation Timing
Release 1 proposed topics: RSE licensee operations and profile and financial data	September to November 2022
Release 2 proposed topics: non-financial risk, insurance and investments	November to February 2023
Release 3 proposed topics: membership, retirement outcomes, defined benefits, disclosure and any other topics raised through consultation	March to June 2023

Phase 3 'Quality', the final stage of the SDT, will review and address any issues with quality, consistency or unintended consequences of the new reporting framework after the completion of Phases 1 and 2.

Reporting standards introduced under Phase 2 will greatly enhance the coverage, quality and granularity of information that is reported to APRA by RSE licensees. This will support the industry and other key stakeholders in understanding the drivers of outcomes provided for members and provide additional insights into the operations of the industry, including governance and risk management practices.

APRA intends to use this additional data to strengthen its prudential oversight of the superannuation industry by gaining deeper insight into RSE licensee's business operations. This will in turn support the work APRA is doing to improve outcomes for members and increase its supervisory intensity where RSE licensees are underperforming or where improvements in practices are needed.

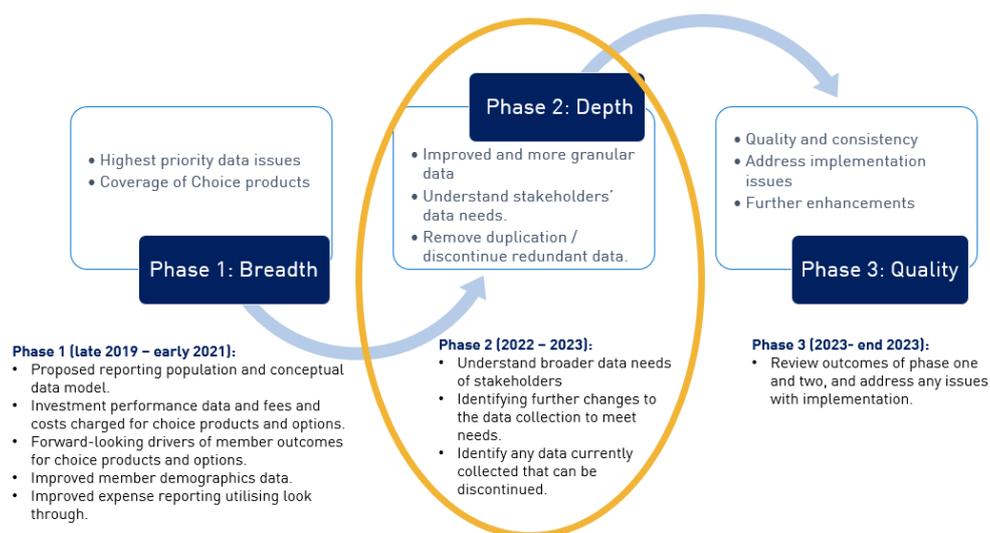
Chapter 1 – Background, objectives and scope

1.1 Background

APRA has broad data collection powers under the *Financial Sector (Collection of Data) Act 2001* (FSCODA) and has determined a number of reporting standards under this Act to require submission of specific data from RSE licensees. This data supports APRA's prudential supervision of these entities and public policy making, while delivering transparency on the industry for a wide range of stakeholders.

On 7 November 2019, APRA released a discussion paper launching the SDT. As the SDT is a multi-year project that is broad in scope, APRA divided the work into three phases:

Super Data Transformation: Three Phases



The 2019 discussion paper set out the approach for Phase 1 of the SDT, with consultation on seven topic areas to take place across three targeted consultation releases, each containing the proposed reporting standards and a template for the collection of pilot data. Consultation on the Phase 1 topics was undertaken in these three stages over 2019 and 2020 with a

response paper issued in March 2021. APRA determined ten new superannuation reporting standards in September 2021.¹

The ten new reporting standards from Phase 1 have addressed the coverage and granularity of reporting for choice products and investment options and have improved the visibility of performance and member outcomes.²

In addition to these new reporting standards, APRA also collects data under a further 41 reporting standards.³ Eleven of these existing reporting standards have been either wholly or partially replaced by the new reporting standards; refer to Attachment A for details of the reporting standards currently collected under D2A, including those which APRA proposes to repeal and the data items which will be included in Phase 2 proposals.

1.2 Objectives of the SDT

The SDT supports APRA's overarching objective to actively drive an RSE licensee culture of continuous improvement and delivering quality outcomes to members to and through retirement, including addressing underperformance in the superannuation industry.

In carrying out the SDT, APRA is seeking to:

- Improve the suite of data that supports APRA's prudential supervision;
- Improve the ability of RSE licensees to assess and compare their operations, performance and outcomes for members; and
- Improve the ability of other stakeholders in the superannuation industry (such as other regulators and policy makers) to make informed, data-enabled decisions.

As part of the project, APRA will also improve the efficiency and effectiveness of how APRA collects data for the superannuation industry. As signalled in APRA's *Direction for Data Collection* discussion paper, APRA intends to collect richer, more flexible data collections to inform decision-making across all industries.

¹ On 18 February 2022, APRA released a discussion paper on the publications and confidentiality proposals for the data collected under these ten new superannuation reporting standards. Consultation closes on 15 April 2022.

² Note that *Reporting Standard SRS 101.0 Definitions for Superannuation Data Collections* will be updated to include definitions introduced under Phase 2; the remaining nine new reporting standards are not in scope for further changes.

³ Consistent with APRA's principle of 'collect once and share' with other government agencies, three reporting forms outlined above are collected on behalf of the Australian Bureau of Statistics (ABS). APRA is proposing to transition these forms from D2A to APRA Connect in Phase 2.

APRA's Direction for Data Collections: collect richer, more flexible data to inform decision-making

Recent advances in financial services' data capability require APRA, as prudential supervisor, to enhance its own capability.

To support data-driven decisions by internal and external stakeholders and as a further step towards better regulation, APRA's Corporate Plan 2021-2025 makes data a strategic priority. APRA will continue to invest in and embed data as a core enabler for achieving its purpose and strategy.

APRA's plans align with the Australian Government's whole-of-economy vision for data. APRA's approach seeks to maximise the value of data collected by explaining benefits, removing barriers and sharing insights; keep it safe and secure; and enable greater use by investing in data infrastructure, management, skills and capability.

APRA intends to work with peer agencies to collect once and share, creating a single source of truth; reducing burden on industry; and improving alignment on common challenges.

A key element underpinning these objectives is transparency. A transparent industry enables stakeholders to hold RSE licensees accountable for their performance, using meaningful comparisons and analysis, which requires consistent, reliable and granular data.

1.3 Scope of Phase 2 of the SDT

The SDT is considering the complete suite of data needed to support APRA's prudential supervision and the needs of other industry stakeholders, including other regulators. While there is already a significant volume of data on the superannuation industry, there are important gaps in coverage and quality that inhibit deeper insights on RSE licensees' business operations and a better understanding of how outcomes are being delivered to their members.

Under Phase 1, APRA broadened the coverage and granularity of industry data collected, for example, to include all choice products and investment options; and improved granularity of expenses, insurance arrangements, member demographics and asset allocation classifications.

APRA is now considering stakeholder data needs on topics including, but not limited to, supporting the assessment of retirement outcomes for superannuation members, the performance and efficiency of the industry, governance, risk management practices, fund operations and industry risks.

As noted in APRA's *Direction for Data Collections*⁴ discussion paper, APRA is also considering cross-industry reporting requirements on a number of topics, including Remuneration, Financial Accountability Regime (FAR), climate change financial risks and other non-financial risks. APRA will consider alignment and integration of these collections with the broader superannuation collections through SDT Phase 2.

⁴ [Direction for Data Collections discussion paper](#)

While implementation of cross-industry collections is likely to vary by industry, APRA may engage and consult across all regulated industries on common data items at the same time. Beyond these common data items, the superannuation industry may have unique data items, specific to the arrangements and risks in superannuation. APRA will ensure that any superannuation specific data items remain connected to our activities on cross-industry data collections.

The relevant SDT working groups and strategic engagement group will be engaged on all cross-industry collections. APRA welcomes feedback on key differences for super that should be considered on an industry specific basis.

Recognising the challenges associated with consulting on a broad range of topics, APRA proposes to consult on the broad groupings of topics outlined below. APRA welcomes feedback on any additional topics or specific data items that APRA should consider in scope for Phase 2.

Proposed topics in scope for Phase 2	
RSE licensee operations and profile; including:	<ul style="list-style-type: none"> a) RSE licensee and RSE profile b) Service providers c) RSE fees collected d) RSE indirect investment costs with service providers e) Complex product features (including lifecycle features) f) RSE wind up information
Financial data; including:	<ul style="list-style-type: none"> a) Financial statements b) Use of reserves c) Financial resilience
Non-financial risk; including:	<ul style="list-style-type: none"> d) Board governance e) Other non-financial risks
Investments; including:	a) Investments including reporting collected on behalf of the Australian Bureau of Statistics
Insurance; including:	a) Self-insurance
Membership; including:	<ul style="list-style-type: none"> a) Member demographics and member flows b) Conditions of release
Retirement outcomes; including:	<ul style="list-style-type: none"> a) Retirement products b) Retirement outcomes
Defined benefits; including:	a) Defined benefit matters
Disclosure; including:	a) MySuper Product dashboard

APRA will consider all current reporting standards collected through Direct to APRA (D2A), as well as potential new reporting standards to support achievement of APRA's objectives under each topic and address gaps in the current data collection.

As highlighted in APRA's *Direction for Data Collections* discussion paper, APRA plans to progressively move all data collection for all industries to the new APRA Connect system over the next five years and be in a position to decommission D2A. By 2025, APRA expects to have all superannuation collections on APRA Connect. Under Phase 2, APRA will review the existing reporting standards with a view to identifying redundant reporting obligations that can be discontinued. APRA will also identify any areas for enhancement or redesign as part of the migration of all existing superannuation collections in D2A to APRA Connect.

Refer to Attachment A for the list of the current reporting standards collected through D2A.

The SDT covers all APRA-regulated RSE licensees and exempt public sector schemes (EPSSSs).⁵ Phase 2 will include consultation on reporting standards which apply to small APRA funds.

⁵ EPSSSs are not regulated by APRA but agree to report data in accordance with APRA's reporting standards.

Chapter 2 - Consultation process

2.1 Structure of the Phase 2 consultations

Consistent with APRA's approach in Phase 1, to assist stakeholders to consider the various elements of change proposed in Phase 2, APRA proposes to release proposals for each topic separately. APRA will release a 'topic paper' to accompany the draft proposed reporting standards for each topic. Each topic paper will set out the gaps and issues with relevant reporting requirements and proposals to rectify gaps and improve the data collected and questions on specific areas where feedback is sought.

Industry feedback has indicated challenges with capacity to engage with consultations, particularly over the August to September period due to a number of regulatory changes to respond to and implement including the expanded performance test. Unless exceptional circumstances arise, APRA is planning not to issue any consultations for the superannuation industry from August to mid-September 2022 in order to allow industry to focus on the performance test, and to ensure industry are able to engage meaningfully in APRA's consultations. The proposed timeline for Phase 2 consultations in this discussion paper reflects this approach, with the first consultation on reporting standards delayed until mid-September 2022.

APRA proposes to release these topic papers in three stages, according to the timetable set out below. APRA welcomes feedback on the proposed sequencing, grouping and timing of topics. Refer to Attachment A for the relevant topics for each of the existing reporting standards.

Release 1

1. RSE licensee operations and profile
2. Financial data

Release 2

1. Non-financial risks
2. Investments
3. Insurance

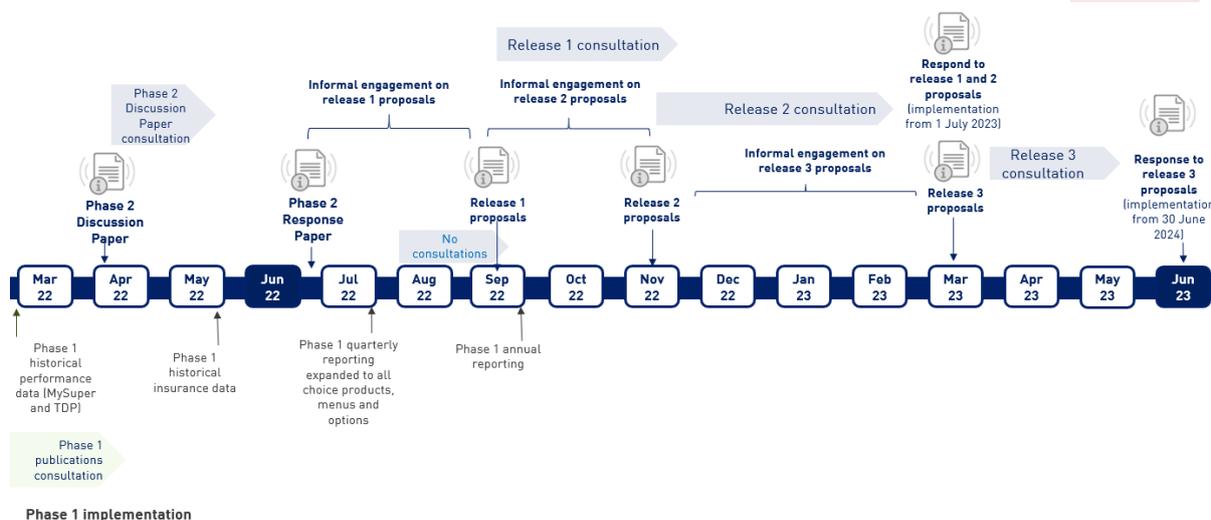
Release 3

1. Membership
2. Retirement outcomes
3. Defined benefits
4. Disclosure

The proposed release timeframes for the Phase 2 topic papers are included in the timeline below:

Phase 2– Industry Consultation Timeline

Phase 2 reporting standards



APRA welcomes feedback from industry on the proposed timing and sequencing of topics for consultation. APRA also welcomes early feedback on whether any specific topics would require different lead times for implementation. APRA will host a round-table discussion in May 2022 with RSE licensees and non-RSE licensee stakeholders.

To register for this round-table please email superdatatransformation@apra.gov.au.

APRA will consult on the implementation dates for proposed reporting standards under each topic paper. Recognising that some data will be new or significantly changed, APRA will consider the appropriateness of proposing an iterative implementation approach for some topics, with initial reporting on a best endeavours basis and feedback and submissions analysed to clarify the proposals prior to finalising the reporting standard.

2.2 Overview of consultation approach

APRA recognises that implementing new data collections takes time and the impact on RSE licensees' business operations will vary. This has informed APRA's planned staged consultation throughout Phase 2, and plans to consult through a range of different methods, including formal consultations and industry round-tables. APRA will also seek nominations for representatives on:

- a strategic project stakeholder forum to enable ongoing strategic engagement at a senior management level on issues impacting the industry throughout the project.
- industry working groups on specific topics to enable ongoing operational engagement on detailed proposals throughout the project.

Opportunities to engage on SDT Phase 2 are outlined in the table below:

Stage	Opportunities to engage
Phase 2 approach and planning	Express interest in attending round-tables to be held in May 2022. Stakeholders may also respond in writing to this paper.
Phase 2 strategic project updates and engagement	Express interest in representation on the strategic project stakeholder forum.
Formal consultation	Express interest in participating in working groups for specific topics. See section 2.4 for the proposed timelines for formal consultation.
Iterative design and testing of new collections	Join periodic webinars, regular meetings with industry bodies and/or working groups to develop and test each new collection. Entities may also explore collections in APRA Connect test environment (they will be made available early); or volunteer to participate in proof-of-concept and pilot activities.

2.3 Inter-agency collaboration

APRA will continue to collaborate with peer agencies on collective data requirements to reduce individual agency requests. This includes engagement with the Australian Securities and Investments Commission (ASIC), the ABS, the Australian Tax Office (ATO) and the Commonwealth Treasury. APRA welcomes other agencies that could be engaged.

2.4 Alignment with other reporting frameworks

APRA will also review other sources of data available in industry as part of Phase 2. This includes exploring sharing member-level data with the ATO (as the ATO collects transactions information for payments into member's accounts) and complaints information collected by ASIC.

APRA welcomes feedback on any existing reporting or classification frameworks that APRA should consider in developing reporting proposals and classifications for each topic.

2.5 Pilot data collection

For the draft reporting standards accompanying each topic paper, APRA will make draft reporting forms available in APRA Connect. For some reporting standards, APRA may also request pilot data from all entities or a sample of entities to be submitted by a specified date.

Past experience has shown that many implementation issues can be exposed during the initial collection of data. The submission of pilot data in Phase 1 was useful in identifying implementation challenges early, whether reporting definitions require clarification, and ensuring the proposals will meet user needs. Requiring the submission of data in the first and second release of the Phase 1 pilot data process identified implementation issues which were addressed through consultation. The voluntary submission of pilot data in the third release, however, had a low level of submissions and implementation issues that arose in the first submissions were not identified ahead of time.

APRA recognises the burden associated with compulsory submission of pilot data so will consider the following principles when considering how to approach the pilot collections in Phase 2:

1. Degree of change from existing collections is medium/high
2. Pilot forms will be made available in APRA Connect but may not be mandatory for all entities for all proposed collections
3. Appropriateness of a sample group of entities to pilot collections
4. Appropriateness of using subset or sample of data is sufficient
5. Appropriateness of extended timeframes (beyond the consultation period) for submission of pilot data

APRA welcomes feedback on the principles that APRA intends to apply to determine the approach to pilot collections, and on entities' experience with pilot collections under Phase 1.

2.6 Determining data to be non-confidential

To enable improved industry transparency, APRA's objective is that most data proposed under the SDT be non-confidential; and able to be made public. APRA intends to continue this approach in Phase 2, with each topic paper making clear the data items that APRA proposes to determine non-confidential. These proposals will include data items from existing collections that are being captured as part of Phase 2.

Determining data to be non-confidential will increase transparency, enabling APRA and stakeholders to use the data to make meaningful comparisons across the superannuation industry. APRA will consult on the determination of data to be made confidential once the reporting standards are finalised.

2.7 Publication of data

As a general principle, given SDT's objective to improve transparency, APRA intends to make as much data as possible publicly available and will consult on proposed publications once the Phase 2 reporting standards are finalised.

Chapter 3 - Feedback sought on Phase 2 proposals

To assist in consideration of the proposed scope and approach for Phase 2, a list of consultation questions on specific areas APRA is seeking feedback on is provided below:

#	Topic	Question
1	Scope	Do you have any feedback on the proposed Phase 2 topics?
2	Scope	Are there any additional topics or specific data items APRA should consider in scope for Phase 2?
3	Existing data sources	Are there any existing reporting or classification frameworks that APRA should consider in developing reporting proposals and classifications for each topic?
4	Approach	Do you have any feedback on the consultation approach?
5	Approach	Do you have any feedback on the principles that APRA intends to apply to determine the approach to pilot collections? Or your experience in pilot collections under Phase 1?
6	Approach	Do you have any feedback on the proposed iterative implementation approach for certain topics?
7	Current reporting standards	Do you have any initial views about existing reporting standards that are currently collected through D2A that could be amended or discontinued?
8	Timeline and sequencing	Do you have any feedback on the timing and sequencing of topics for consultation?
9	Timeline and sequencing	Do any of the topics require different lead times for implementation?
10	Timeline and sequencing	Are there any related upcoming activities or changes which may impact the timing, implementation or design of reporting for each topic?

3.1 Request for submissions

APRA invites written submission on the proposals set out in this Discussion Paper by 12 May 2022. APRA will invite further submissions as part of each Topic Papers released in Phase 2.

Written submissions from RSE licensees are requested to be submitted through APRA Connect.

Written submissions from other industry stakeholders should be sent to superdatatransformation@apra.gov.au and addressed to:

General Manager
Data Analytics & Insights
Risk and Data Analytics Division
Australian Prudential Regulation Authority
GPO Box 9836
SYDNEY NSW 2001

3.2 Information to include in submissions

APRA encourages stakeholders to provide information that will assist APRA in better understanding any impediments to providing the proposed data and requests comments made in submissions are as specific as possible, identifying specific data item(s) or instruction(s) where possible.

In order to perform a cost-benefit analysis, APRA invites feedback from interested parties on the financial impact of the proposed collection. This includes implementation and ongoing costs of reporting under the data collection proposals, and whether these costs are expected to increase or decrease over time. APRA also seeks specific feedback on any barriers or associated costs to implementing the changes within the proposed timeframes.

Submissions can also indicate whether there are any particular aspects of the proposals that could be improved or removed to reduce compliance costs, or if there are particular data items which are more or less difficult to provide.

Feedback on expected costs incurred under the proposed collection can be provided to APRA using the template for costings available on the APRA website at:

[Phase 2 - Consultation on SDT Phase 2 Scope and Approach](#)

Comment is invited on all areas covered in this Discussion Paper and the specific questions APRA is seeking comment on.

3.3 Information disclosure requirements – publications 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 *Freedom of Information Act 1982* (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 *Australian Prudential Regulation Authority Act 1998* and will therefore be exempt from production under the FOIA.

Attachment A: Current reporting standards

Reporting Standard Number	Reporting Standard Name	Reporting Level	Frequency	Topic	Proposed for discontinuation under Phase 1
SRS 001.0	Profile and Structure (Baseline)	RSE licensee	Annual, Adhoc	Profile	SRF 605.0 - parts to be considered for discontinuation
SRS 114.0	Operational Risk Financial Requirement	RSE licensee	Annual	Non-financial risk	
SRS 114.1	Operational Risk Financial Requirement	RSE	Annual	Non-financial risk	
SRS 160.0	Defined Benefit Matters	RSE	Annual	Defined benefits	
SRS 160.1	Defined Benefit Member Flows	RSE/Sub-fund	Quarterly	Defined benefits	
SRS 161.0	Self-Insurance	RSE	Annual	Insurance	
SRS 250.0	Acquired Insurance	RSE	Annual	Insurance	SRS 251.0 To propose discontinuation
SRS 320.0	Statement of Financial Position	RSE	Quarterly, Annual	Financial data	
SRS 320.1	Statement of Financial Position	Sub-fund	Annual	Financial data	
SRS 330.0	Statement of Financial Performance	RSE	Quarterly, Annual	Financial data	
SRS 330.1	Statement of Financial Performance	Sub-fund	Annual	Financial data	
SRS 330.2	Statement of Financial Performance	MySuper product	Annual	Financial data	

Reporting Standard Number	Reporting Standard Name	Reporting Level	Frequency	Topic	Proposed for discontinuation under Phase 1
SRS 331.0	Services	RSE	Annual	RSE operations	SRF 332.0 - parts to be considered for discontinuation
SRS 410.0	Accrued Default Amounts	RSE	Quarterly		
SRS 520.0	Responsible Persons Information	RSE Licensee	Annual, Adhoc		Migrated to corporate profile information in APRA Connect
SRS 530.0	Investments	RSE	Quarterly, Annual	Investments	SRF 550.1 - parts to be considered for discontinuation
SRS 531.0	Investment Flows	RSE	Quarterly, Annual	Investments	
SRS 532.0	Investment Exposure Concentrations	RSE	Quarterly	Investments	SRF 550.1 - parts to be considered for discontinuation
SRS 533.0	Asset allocation	MySuper	Quarterly, Annual	Investments	SRF 550.0 – propose to discontinue
SRS 533.1	Asset Allocation and Member Benefit Flows	Select Investment Options	Quarterly, Annual	Investments	SRF 550.0 – parts to be considered for discontinuation
SRS 534.0	Derivative Financial Instruments	RSE	Annual	Investments	SRF 550.2 - parts to be considered for discontinuation
SRS 535.0	Securities Lending	RSE	Annual	Investments	
SRS 540.0	Fees	RSE/MySuper product	Annual	RSE operations	
SRS 600.0	Profile and Structure (RSE licensee)	RSE licensee	Annual	RSE licensee operations	
SRS 601.0	Profile and Structure (RSE)	RSE	Annual	RSE operations	SRF 605.0 – parts to be considered for discontinuation
SRS 602.0	Wind up	RSE	Annual	RSE operations	

Reporting Standard Number	Reporting Standard Name	Reporting Level	Frequency	Topic	Proposed for discontinuation under Phase 1
SRS 610.0	Membership Profile	RSE	Annual	Membership	SRF 611.0 - parts to be considered for discontinuation
SRS 610.1	Changes in Membership Profile	RSE	Annual	Membership	
SRS 610.2	Membership Profile	MySuper product	Annual	Membership	SRF 611.0, SRF 606.0 - parts to be considered for discontinuation
SRS 700.0	Product Dashboard	MySuper Investment option	Annual, Adhoc	Disclosure	
SRS 702.0	Investment performance	MySuper Investment option	Quarterly, Annual	Member outcomes	SRF 705.0 To propose discontinuation
SRS 703.0	Fees Disclosed	MySuper product	Annual, Adhoc	Member outcomes	SRF 706.0, SRF 251.3 - parts to be considered for discontinuation
SRS 710.0	Conditions of Release	RSE	Annual	Membership / retirement	
SRS 720.0	ABS Statement of Financial Positions	RSE	Quarterly	Financial data	
SRS 721.0	ABS Securities Subject to Repurchase and Resale and Stock Lending and Borrowing	RSE	Quarterly	Investments	
SRS 722.0	ABS Derivatives Schedule	RSE	Quarterly	Investments	SRF 550.2 - parts to be considered for discontinuation
SRS 800.0	Financial Statements (Small APRA Funds)	RSE (Small APRA Funds)	Annual	Financial data	
SRS 801.0	Investments and Investment	RSE (Small APRA Funds)	Annual	Investments	

Reporting Standard Number	Reporting Standard Name	Reporting Level	Frequency	Topic	Proposed for discontinuation under Phase 1
	Flows (Small APRA Funds)				
SRS 802.0	Fund Profile (Small APRA Funds)	RSE (Small APRA Funds)	Annual	RSE operations	



APRA