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File Name: [REDACTED]

28 March 2013

Neil Grummitt  
General Manager, Policy Development  
Policy, Research and Statistics  
Australian Prudential Regulation Authority  
GPO Box 9836  
Sydney NSW 2001

Email: [superannuation.policy@apra.gov.au](mailto:superannuation.policy@apra.gov.au)

Dear Mr Grummitt,

**RE: Draft Prudential Practice Guide PPG 235 Managing Data Risk**

The Association of Superannuation Funds of Australia (ASFA) is pleased to provide this submission in response to the consultation draft *Prudential Practice Guide PPG 235 Managing Data Risk* (PPG 235) released on 11 December 2012.

ASFA strongly supports the release of a PPG on managing data risk..

**About ASFA**

ASFA is a non-profit, non-political national organisation whose mission is to protect, promote and advance the interests of Australia's superannuation funds, their trustees and their members. We focus on the issues that affect the entire superannuation system. Our membership, which includes corporate, public sector, industry and retail superannuation funds, plus self-managed superannuation funds and small APRA funds through its service provider membership, represent over 90% of the 12 million Australians with superannuation.

**General comments**

We note that this is cross-industry guidance that is applicable to all APRA regulated entities.

Within the superannuation industry, management of data risk is important for a broad range of business outcomes, including meeting financial and other obligations to beneficiaries. Hence, Board and senior management of an APRA-regulated institution need to have an understanding of the risks associated with the management of data, including its collection, retention and use, and of the practices that would safeguard data quality across the data life-cycle. In that context, this PPG is a welcome addition to existing APRA guidance material.

We also note that this PPG covers a subset of information technology (IT) risk, which is addressed more broadly in *Prudential Practice Guide 234 Management of security risk in information and information technology* (PPG 234).

ASFA is in agreement with this focus and commends APRA on the efforts made to give these particular matters priority and include them in its guidance material.

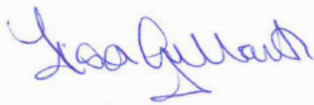
In support of the PPG, ASFA will be giving consideration to the preparation of a Best Practice Paper to provide further guidance and assistance to trustees of superannuation entities.

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I trust that the information contained in this submission is of value. We would be pleased to meet with you to discuss our submission.

If you have any queries or comments regarding the contents of our submission, please contact ASFA's Principal Policy Adviser, Robert Hodge, on [REDACTED] or by email [REDACTED]

Yours sincerely



Fiona Galbraith  
Director, Policy