

From: Andrew Watts
Sent: Thursday, 28 March 2013 3:44 PM
To: datamgt
Cc: Mark Wickett; Will Conlan; Andrew Watts
Subject: Draft Prudential Practice Guide 235 for the Management of Data Risk - response from Bendigo and Adelaide Bank Limited

Importance: High

To: Mr Neil Grummitt, General Manager, Policy Development, Policy, Research & Statistics, Australian Prudential Regulation Authority
From: Andrew Watts, Executive – Change & Chairman of Information Management Committee, Bendigo and Adelaide Bank Limited

Dear Neil

Bendigo and Adelaide Bank Limited recognises the efforts of APRA in publishing a prudential practice guide for the management of data risk (PPG235) and considers the intent and themes of the document to be good practice in the industry.

Given the importance of data and information across all areas of the business, Bendigo and Adelaide Bank Limited considers that data risk is the responsibility of the entire business, and is rarely an issue that can be addressed solely by an information technology system or process. Therefore, Bendigo and Adelaide Bank Limited would like to see paragraph 12 amended such that data risk is considered to be a subset of operational risk, that overlaps with information technology risk, rather than it being a subset of information & information technology risk alone.

Thank you for the opportunity to respond to this draft prudential practice guide for the management of data risk.

Yours sincerely
Andrew Watts

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