



# Discussion Paper

## Authorised Deposit-taking Institutions' *Points of Presence* statistics

September 2015

## **Disclaimer and Copyright**

While APRA endeavours to ensure the quality of this publication, it does not accept any responsibility for the accuracy, completeness or currency of the material included in this publication and will not be liable for any loss or damage arising out of any use of, or reliance on, this publication.

© Australian Prudential Regulation Authority (APRA)

This work is licensed under the Creative Commons Attribution 3.0 Australia Licence (CCBY 3.0). This licence allows you to copy, distribute and adapt this work, provided you attribute the work and do not suggest that APRA endorses you or your work. To view a full copy of the terms of this licence, visit [www.creativecommons.org/licenses/by/3.0/au/](http://www.creativecommons.org/licenses/by/3.0/au/).

## Preamble

The Australian Prudential Regulation Authority (APRA) is the prudential regulator of the Australian financial services industry. It oversees banks, credit unions, building societies, general insurance and reinsurance companies, life insurers, friendly societies, and most of the superannuation industry. APRA collects a broad range of financial and risk data from regulated institutions as inputs to its supervisory assessments. Data collected from regulated and unregulated institutions also assist the Reserve Bank of Australia (RBA), the Australian Bureau of Statistics (ABS) and other financial sector agencies to perform their roles. APRA also collects some data to enable APRA to publish information about regulated institutions, and in other cases, to assist the Minister to formulate financial policy. Much of the data APRA collects are used for multiple purposes to reduce the burden of reporting.

APRA publishes as much of the data collected as are considered useful and as resources permit, subject to APRA's confidentiality obligations with respect to individual institutions' data. Publication of industry-level statistics enhances understanding of the industries regulated by APRA, aids public discussion on policy issues, and supports well-informed decision-making by regulated institutions, policy-makers, market analysts and researchers. Publication of institution-level data, where possible, is also consistent with promoting the understanding of the financial soundness of regulated institutions.

APRA observes international statistical standards in developing, producing and managing its statistics (except in the few cases where doing so would conflict with APRA's primary role as a prudential regulator). By doing so, APRA helps protect commercially-sensitive information provided by institutions, whilst providing statistics that are useful and reliable, and that meet the needs of users.

APRA publishes detailed banking services provided within Australia by Authorised Deposit-taking Institutions (ADI) in its ADI *Points of Presence* (PoP) statistics. APRA is reviewing the PoP statistics to

ensure that the statistics remain relevant and useful. This paper focuses on two options for the future of the PoP statistics and data collection:

1. streamline the PoP statistics and data collection; or
2. cease the PoP statistics and data collection.

APRA is seeking feedback on the proposed changes. Written submissions should be forwarded by 18 November 2015, preferably by email to:

Manager, Banking Statistics,  
Australian Prudential Regulation Authority  
GPO Box 9836  
Sydney NSW 2001  
Email: [statistics@apra.gov.au](mailto:statistics@apra.gov.au)

## Important

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* (APRA Act) and will therefore be exempt from production under the FOIA.

## Table of contents

Glossary	5
Chapter 1 – Introduction	7
Chapter 2 – Proposed changes to ADI Points of Presence statistics	9
Chapter 3 – Proposed changes to ADI Points of Presence reporting requirements	13
Chapter 4 – Request for cost-benefit analysis information	15

## Glossary

Term	Definition
ABS	Australian Bureau of Statistics
ADI	Authorised deposit-taking institution
APMRC	Australian Population and Migration Research Centre
APRA	Australian Prudential Regulation Authority
ARIA	Accessibility and Remoteness Index of Australia
ASGC	Australian Standard Geographical Classification. The ASGC was used from 1984 to 2011 by the ABS for the collection and dissemination of geographically classified statistics.
ASGS	Australian Statistical Geography Standard. The ASGS is the Australian Bureau of Statistics' new geographical framework. The ASGS replaces the ASGC.
ATMs	An automated teller machine or ATM is an electronic banking outlet which allows an authorised cardholder to complete basic transactions without the assistance of an ADI's employee. These outlets allow the user to withdraw cash from a cheque /savings or credit account. Authorisation is via a Personal Identification Number (PIN). Access is unassisted and may be 24 hours per day, depending on the terminal's location. The outlets may also provide access to a varying range of other services such as balance inquiry, transfer of funds and acceptance of deposits.
Branch	See Points of Presence
EFTPOS terminals	Electronic funds transfer at point of sale terminals or EFTPOS are electronic payment systems. EFTPOS terminals are located at retail outlets and enable an authorised cardholder to purchase goods and services using either debit or credit funds at the point of sale. Some terminals may also enable cash withdrawals using deposit funds.
Electronic (points of presence)	See Points of Presence
Geocode	Geocode, or specifically an address code, is the geographic coordinates on the ground (longitude/latitude) for an address.
Other face-to-face (points of presence)	See Points of Presence

Term	Definition
Non face-to-face (points of presence)	See Points of Presence
Points of presence	<p>The individual points of banking presence provided by ADIs. Points of presence are categorised by type of service channel: branch; other face-to-face; electronic; non face-to-face; and post office.</p> <p>Branches are an ADI service channel that meets APRA’s definition of a branch level of service:</p> <ul style="list-style-type: none"> <li>• accepts cash and other deposits (including business deposits) and provides change;</li> <li>• facilitates the keeping of accounts for customer access, including the provision of account balances;</li> <li>• opens and closes accounts;</li> <li>• can facilitate or arrange the assessment of the credit risk of existing and potential customers; and</li> <li>• offers additional services in the one establishment such as financial services, business banking and specialist lending.</li> </ul> <p>Other face-to-face includes all points of presence that provide face-to-face services but do not meet the definition of a branch level of service.</p> <p>Electronic points of presence include ATMs, EFTPOS, RediPOS, Credit Authorised Transfer (CAT) and CAT with Merchant Data CAPture (CAT/CAP).</p> <p>Non face-to-face comprises service channels which provide no face-to-face services, for example internet / telephone banking.</p> <p>Bank@Post points of presence are selected Australia Post offices that offer personal banking services on behalf of participating ADIs.</p> <p>Post office points of presence are selected Australia Post offices that offer business banking services on behalf of participating ADIs.</p>
PoP	ADI Points of Presence publication
Post Office	See Points of Presence

# Chapter 1 – Introduction

## 1.1 Background

APRA collects a broad range of financial and risk data from regulated institutions as inputs to its supervisory assessments. Data collected from regulated and unregulated institutions also assist the RBA, the ABS and other financial sector agencies to perform their roles. APRA also collects some data to enable it to publish information about regulated institutions, and in other cases, to assist the Minister to formulate financial policy. Much of the data APRA collects are used for multiple purposes to reduce the burden of reporting.

APRA's *ADI Points of Presence* (PoP) statistics are part of APRA's ADI statistical suite. APRA has released the statistics annually since 2001. They detail banking services provided within Australia by ADIs. The statistics include the number, location (state, town, and postcode) and remoteness indicator of the points of presence (e.g. branch, agency, ATM) of each ADI. The individual points of presence are categorised using the Australian Population and Migration Research Centre's (APMRC) Accessibility and Remoteness Index of Australia (ARIA), which classifies the locations according to accessibility or remoteness.<sup>1</sup> PoP statistics are published on APRA's website at <http://www.apra.gov.au/adi/Publications/Pages/points-of-presence.aspx>

PoP statistics are based on data submitted to APRA by ADIs on ADI Reporting Form *ARF 396.0 Points of Presence* (ARF 396.0) as at 30 June each year. ARF 396.0 is available to view on APRA's website at <http://www.apra.gov.au/adi/ReportingFramework/Pages/reporting-forms-and-instructions-adis.aspx>.

Publishing PoP statistics stemmed from the Commonwealth Government's response to the recommendations of the House of Representatives

Standing Committee on Economics, Finance and Public Administration review of the Australian Prudential Regulation Authority: *Who will Guard the Guardians?* in 2000.<sup>2</sup> In its response to the committee's recommendations, the Government committed:

*That APRA provide yearly statistics which include the location and level of face to face banking in Australia.*

The PoP statistics also contribute to the International Monetary Fund's Financial Access Survey, which collects and disseminates comparable data on the geographic and demographic outreach of basic consumer financial services within a country.

Consistent with international statistical standards to regularly review the relevance of statistics, and APRA's commitment to look for opportunities to reduce compliance costs for business and the community, APRA is reviewing the PoP statistics and consequently, the data collection. APRA is reviewing the value of the statistics that are published and investigating ways to ease reporting burden.

The Government has advised APRA that consistent with its deregulation agenda, the Government is supportive of APRA's proposal to conduct a public consultation to determine the need for continuing the publication. If the costs of reporting are found to outweigh the benefits to users, the Government has indicated that APRA could discontinue the data collection.

This paper focuses on two options for the future of the PoP statistics and data collection:

<sup>1</sup><http://www.adelaide.edu.au/apmrc/research/projects/category/aria.html>

<sup>2</sup>[http://www.aph.gov.au/parliamentary\\_business/committees/house\\_of\\_representatives\\_committees?url=efpa/apra/report.htm](http://www.aph.gov.au/parliamentary_business/committees/house_of_representatives_committees?url=efpa/apra/report.htm)

1. streamline the PoP statistics and data collection; or
2. cease the PoP statistics and data collection.

Chapter 2 describes the two options for the PoP statistics; chapter 3 describes the resulting changes to ARF 396.0 and the impact on reporting burden. Chapter 4 invites information to assist APRA conduct a cost-benefit analysis on the impact of the proposals.

If, after considering the feedback received in response to the discussion paper, APRA continues to publish PoP statistics, APRA intends to issue a response paper and finalise the content and format of the streamlined statistics and the PoP data collection in early 2016.

If, however, the benefits of the PoP statistics to users do not appear to outweigh the costs of reporting for ADIs, based on feedback provided in response to this paper, APRA will cease the PoP statistics and data collection.



## Chapter 2 – Proposed changes to ADI Points of Presence statistics

### 2.1 Option 1: publish streamlined PoP statistics

Under this option APRA would streamline the PoP statistics to provide users with the most relevant information on the ADI points of presence in Australia, and in particular, their accessibility. The proposals are in line with feedback on the current needs of users, sourced from informal feedback, stakeholder surveys and public use of the current PoP statistics. There are three main changes to the statistics APRA would publish: APRA would publish information on comparable service channels; more useful information about locations; and additional information about remoteness. Each of these changes is explained below.

#### 2.1.1 Service channels

The PoP statistics currently contain details about many service channels offered by ADIs, and every point of presence of each service channel. APRA also publishes industry-level statistics on the remoteness of ‘branch’ or ‘other face-to-face’ points of presence.

Excluding branches, which must meet minimum requirements to be characterised as a branch, ADIs are able to segment their own channels into types of outlet. This results in a wide variety of service channels being published that are not always easily comparable. As at 30 June 2015, the PoP statistics contained information on over 100 different types of service channels.

For each individual point of presence, for each type of service channel, APRA reports whether they offer personal and/or business cash transactions and operate on a part-time basis. APRA also publishes a detailed description of each point of presence for each service channel type.

Under option 1, APRA proposes to streamline the types of service channels so they are more easily identifiable, measurable and comparable, as well as easily understood by users. APRA proposes to publish information on just four types of service

channels: branches; other face-to-face points of presence; ATMs; and EFTPOS terminals.

APRA proposes that the definition of branch level of service remain unchanged. However, the definition of other face-to-face will now only include those service channels that have a fixed address, for example, bank agencies. The previous definition of other face to face included mobile lenders and travelling employees. By tightening the definition of other face to face, APRA intends to produce a more reliable and useful measure of this service channel.

Given that the majority of points of presence offered by ADIs are either ATMs or EFTPOS terminals, and these are the most widely used service channels, APRA proposes to publish more useful information about them. The current PoP statistics group these service channels together under the electronic category and these have not been included in the industry-level statistics. APRA proposes to separate the statistics on ATMs and EFTPOS terminals and publish industry-level statistics for these channels.<sup>3</sup>

APRA proposes to cease publishing information that users suggest do not add much value to the statistics, but adds reporting burden for ADIs. Feedback to APRA suggests that service channels other than branches, other face-to-face, ATMs and EFTPOS terminals are not well understood by users and not easily identifiable due to naming conventions and characteristics of service channels varying between ADIs. For example, APRA currently publishes many variations of service channels that all appear to be classifiable as ‘internet banking’, including ‘internet/ mobile/ telephone banking’; ‘telephone and internet’; ‘internet banking service’; ‘internet banking’; and ‘internet kiosks’. APRA has no evidence that

<sup>3</sup> The ADI Points of Presence publication for June 2015 is available on the APRA website: <http://www.apra.gov.au/adi/Publications/Pages/points-of-presence.aspx>

information like this is used or useful; however information on some of these alternative service channels is also available on ADI websites.

APRA proposes therefore to limit publication of service channels to branches, other face-to-face, ATMs and EFTPOS terminals. Publication of other service channels would be ceased, including other non face-to-face service channels and post offices that offer business banking services on behalf of participating ADIs.

APRA also proposes to cease publishing a description of the points of presence and publishing whether they offer personal and/or business cash transactions and operate on a part-time basis.

### 2.1.2 Locational data

The PoP statistics currently contain details about the town or suburb, postcode and state of every point of presence.

APRA will continue to publish the locations of the points of presence in standard address format (town/suburb, postcode, and state) unless users indicate that this is of limited value.

In addition, APRA proposes to publish geocodes for each point of presence at the ADI-level, specifically latitude and longitude.<sup>4</sup> For example, the address of APRA's Sydney office is: 400 George Street, Sydney, NSW, 2000. The equivalent geocode is -33.869053 (latitude), 151.207244 (longitude). Most ADIs already record geocodes for their points of presence for their own purposes.

By publishing geocoded addresses, APRA intends to facilitate better analysis and greater use of the statistics. PoP users can use the geocoded information to aggregate the unit record data for larger regions and obtain summary statistics. Users

<sup>4</sup> Geocoding is the process of transforming a description of a location—such as an address, or a name of a place—to a location on the earth's surface. The resulting locations are output as geographic features with attributes, which can be used for mapping or spatial analysis. More information is available here: <http://www.nss.gov.au/nss/home.nsf/pages/Statistical%20Spatial%20Framework%20Guidance%20Material>

will also be able to spatially display geocoded addresses (using their own analysis tools), which may be useful for visualisation and to assess and analyse trends.

Deriving these addresses from geocodes will improve the consistency of published addresses. The current format allows ADIs to submit addresses in a free text format which can make comparability difficult.

### 2.1.3 Remoteness classification

The PoP statistics contain information about the remoteness of each point of presence. APRA uses the APMRC's ARIA index where remoteness measures the accessibility to service centres based on road distances.

PoP originated from concerns over the access to financial services available to people living in rural areas and consequently the ARIA index is used to identify the more remote locations and the access to services in these areas.

The ARIA remoteness categories used in the PoP statistics are: highly accessible, accessible, moderately accessible, remote and very remote. Highly accessible areas have relatively unrestricted accessibility to a wide range of goods and services and opportunities for social interaction, while very remote areas have very little accessibility of goods, services and opportunities for social interaction.

While ARIA reports the geographic remoteness of a location, it does not capture the population of each location and therefore is limited in discerning the proportion of the population that have limited access to financial services.<sup>5</sup>

Since the ARIA categories were first used in the PoP statistics, alternate measures of remoteness have become available. The Australian Statistical Geography Standard (ASGS): Volume 5 Remoteness Structure is one example, made available free of

<sup>5</sup>[http://www.adelaide.edu.au/apmrc/research/projects/category/about\\_aria.html](http://www.adelaide.edu.au/apmrc/research/projects/category/about_aria.html)

charge from the ABS.<sup>6</sup> The Department of Health also offers an interactive map that allows users to search any address and obtain its ASGS remoteness area.<sup>7</sup> Users can also now acquire their own ARIA licence to obtain remoteness categories for each location.<sup>8</sup>

APRA proposes to improve the remoteness classification in the PoP statistics by replacing ARIA with the ASGS Remoteness Areas (RAs).<sup>9</sup> The ASGS RAs divides each state and territory into several regions based on their relative access to services taking population size and ARIA remoteness measure into account.<sup>10</sup> The ASGS RAs provide a more meaningful measure of access to ADIs' points of presence as it takes the population for each point into account, as well as its remoteness.

Based on the use of ASGS RAs, APRA proposes to publish statistics in five new remoteness categories: major cities of Australia, inner regional Australia, outer regional Australia, remote Australia and very remote Australia. APRA proposes to publish certain industry-level statistics for branches, other face-to-face and ATMs categorised by remoteness. APRA also proposes to publish the ASGS RA for every point of presence,

<sup>6</sup> The Australian Standard Geographical Classification (ASGC) was used from 1984 to 2011 by the ABS for the collection and dissemination of geographically classified statistics. From 2011 onwards the ABS adopted a new statistical geography classification called the Australian Statistical Geography Standard (ASGS), Volume 5 - Remoteness Structure is available here:  
<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/1270.0.55.005Main+Features1July%202011?OpenDocument>

<sup>7</sup> <http://www.doctorconnect.gov.au/internet/otd/Publishing.nsf/Content/ra-intro>

<sup>8</sup> <http://www.adelaide.edu.au/apmrc/research/projects/category/aria.html>

<sup>9</sup> <http://www.abs.gov.au/ausstats/abs@.nsf/mf/1270.0.55.005?OpenDocument>

<sup>10</sup> Statistical Areas Level 1 (SA1s) have been designed by the ABS as the smallest area of output for the Census of Population and Housing, covering the whole of Australia without gaps or overlaps. The ASGS SA1 boundaries are overlaid onto the ARIA+ grid and an average score is calculated based upon the grid points that are contained within each SA1. The resulting average score determines which remoteness category is allocated to each SA1.

excluding EFTPOS where locational data will only be published at the state level.

In addition, APRA proposes to link locational data of each branch, other face-to-face and ATM points of presence to census population data. Users will then have access to services in a location alongside the usual resident population of that location, providing an insight into the varying access to services available in different locations. EFTPOS data will not be linked to population as information will only be published at a state level.

#### 2.1.4 Publication formats

APRA proposes to continue to publish the statistics in three formats: publications in Adobe PDF; reports in Excel and a database in Excel.

The PDF statistical publication will contain industry-level summary statistics on each of the four service channels broken down by location. Branches, other face-to-face and ATMs will be categorised by state and remoteness, and EFTPOS terminals by state. The publication will also include a time series covering the most recent 10 years, however some of the proposed changes will not be retrospective including changes to locational and remoteness statistics. Publishing PoP statistics in a PDF publication format will enable users to readily access the statistics that are considered the most important aspects of ADIs' points of presence in a self-contained, printable publication.

The statistical report is an Excel version of the PDF publication, with a longer time series in the trend tables, extending back to 2003. Publishing PoP statistics in this format will enable users to readily access and analyse the information that is of most relevance to them.

The Excel database contains all PoP data reported by ADIs at an institution-level, as well as the ASGS RAs and each ADI's industry segment (bank, credit union, building society or other ADI). Users will be able to analyse all PoP data and also import data into various tools to conduct more in-depth analysis with their own statistical tools or applications and create their own custom reports.

Drafts of the proposed PoP statistics are provided on APRA's website.<sup>11</sup> As the Excel report and database are designed to be used online, they are best viewed in Excel online rather than as a printed report.

APRA intends that the proposed PoP statistics will provide users with the most relevant information on accessibility of ADI service channels in Australia. The proposals are in line with feedback on the current needs of users, sourced from informal feedback, stakeholder surveys and public use of the current PoP statistics.

If, based on feedback received in response to this discussion paper, APRA publishes streamlined statistics then APRA proposes to publish the annual PoP statistics for the 12 months to 30 June, in keeping with the normal timeframes for the release of its annual statistics. APRA proposes to release the first edition of the new PoP statistics, which covers the 12 months to 30 June 2016, in late-2016.

## 2.2 Option 2: cease publication of PoP statistics

Under this option, APRA would cease publishing any PoP statistics.

If the feedback on the benefit of the PoP statistics does not sufficiently outweigh the costs to ADIs of reporting the data to APRA, APRA will cease the PoP statistics and consequently, ARF 396.0.

Should APRA cease to publish the statistics, users may be able to compile similar information through other publically available sources, including the ABS, Department of Health and ADIs' websites.

<sup>11</sup> [www.apra.gov.au/adi/Pages/September-2015-Consultation-ADI-Points-of-Presence.aspx](http://www.apra.gov.au/adi/Pages/September-2015-Consultation-ADI-Points-of-Presence.aspx)

## Chapter 3 – Proposed changes to ADI Points of Presence reporting requirements

### 3.1 Option 1: streamline PoP data collection

Under this option, APRA is proposing revisions to ARF 396.0, which has remained unchanged since 2004, to support the proposed enhancements to the PoP statistics.

APRA expects the proposed revisions outlined below will reduce the costs to industry of reporting PoP data. As part of this consultation, APRA is seeking feedback on the financial impact of the proposals. More detail on the cost-benefit impact analysis information requested is provided in Chapter 4.

#### 3.1.1 Service channels

ADIs currently report all service channels on ARF 396.0. The form requires ADIs to identify if any of the service channels offer branch, other face-to-face or electronic services. ADIs must also provide a free-text description of the services offered at each channel. There is no limit to the number of service channels ADIs report. ADIs must complete a separate form for each type of service channel. Some ADIs reported over 10 different service channels as at 30 June 2015.

APRA proposes to amend ARF 396.0 in two ways. Firstly, APRA proposes to limit the types of service channels that must be reported to:

- branches;
- other face-to-face points-of-presence;
- ATMs; and
- EFTPOS terminals.

The revised ARF 396.0 will consist of three forms: a form for face-to-face service channels; a form each for ATMs; and for EFTPOS terminals. ADIs will indicate on the face-to-face service channels form whether or not each point of presence meets APRA's minimum branch requirements. The requirement for further descriptive information on

the service channels, including whether the service channels offers personal and/or business services and operates on a part-time basis, will no longer be required. APRA intends to cease the requirement for ADIs to report a description of each service channel.

By limiting the information that ADIs must report about service channels, APRA intends to reduce the number of data items that ADIs submit, and consequently, reporting burden on ADIs.

#### 3.1.2 Locational data

For each point of presence, ADIs are currently required to report the town or suburb, postcode and state where the service is physically located.

APRA proposes to amend ARF 396.0 by requiring that locational data are reported in geocode format. This would involve reporting the longitude and latitude coordinates for each branch, other face-to-face service channel and ATM instead of the current town/suburb, postcode and state format. ADIs would not be required to report the geocode location of each EFTPOS terminal, just the state.

ADIs have indicated to APRA that they already record geocodes within their management information systems in a format that would enable the information to be populated into ARF 396.0 with little manual intervention. By removing the manual data entry to ARF 396.0, APRA anticipates that many reporting errors can be avoided and the reporting burden on ADIs will be reduced.

APRA has observed that the town/postcode/state data often contains spelling mistakes, incorrectly matched towns to postcodes and mistyped postcodes. Identifying and correcting erroneous data is a burden on reporting institutions and APRA. These types of errors would be significantly reduced or potentially eliminated through the use of geocodes.

A draft of the proposed form is provided on the APRA website.<sup>12</sup>

APRA does not propose that ARS 396.0 would become subject to specific audit requirements. APRA expects that ARF 396.0 would continue to be included with the forms considered in the ADI auditor's review of the ADI's internal processes.<sup>13</sup>

### 3.2 Option 2: cease PoP data collection

Under this option, APRA would cease the PoP statistics and consequently ARF 396.0.

<sup>12</sup>[www.apra.gov.au/adi/Documents/ARF\\_396.0\\_Points\\_of\\_Presence\\_proposed\\_form.xlsx](http://www.apra.gov.au/adi/Documents/ARF_396.0_Points_of_Presence_proposed_form.xlsx)

<sup>13</sup> A copy of the prudential standard *APS 310 Audit and Related Matters* is available on APRA's website at: <http://www.apra.gov.au/adi/PrudentialFramework/Pages/prudential-standards-and-guidance-notes-for-adis.aspx>

## Chapter 4 – Request for cost-benefit analysis information

In order to perform a cost-benefit analysis, APRA welcomes information from interested parties on the financial impact of the changes proposed under both options in this review and any other substantive costs associated with the proposed reforms. Submissions are encouraged to include analysis of the level of cost savings achievable for each option.

### 4.1 Costs

Feedback is sought on the implementation of, and ongoing compliance costs of, the requirements under option 1 and whether these costs are expected to increase or decrease over time. APRA expects the proposed requirements to result in the removal of some compliance and implementation costs. Respondents may also wish to indicate whether there are any other reporting requirements relating to PoP that should be improved or removed to reduce compliance costs. In doing so, please explain what they are, why they need to be improved or removed and what the compliance impact would be if the proposed change was made.

Feedback is also sought on the cost saving potential under option 2 of ceasing the PoP data collection compared to the current reporting burden.

Feedback on compliance cost savings realisable under the proposed changes can be provided to APRA using the template for costings available on the APRA website at:

[www.apra.gov.au/adi/Documents/Template-for-cost-savings-2015.xlsx](http://www.apra.gov.au/adi/Documents/Template-for-cost-savings-2015.xlsx)

The template is designed to capture the relevant costs in a structured way, including a separate assessment of upfront costs and ongoing costs.

### 4.2 Benefits

APRA seeks feedback from interested parties on the usefulness and value attributed to the PoP statistics. In particular, this would include

information on the impact on users if APRA ceased publication of PoP statistics.

APRA also seeks feedback from users on the proposed changes to the PoP statistics. Are the proposed service channels relevant and how are they used? Would other service channel categories be of greater use?

APRA seeks feedback from users on the proposed changes to the locational statistics. Are locational data still relevant and how are they used? Would geocode data improve the usefulness of the locational statistics?

APRA seeks feedback on whether the proposed remoteness categorisation would be more relevant to users and how it would be used. Would other remoteness measures be of greater use?

### 4.3 Analysis

Any feedback received will be considered when finalising any changes to the publication and data collection.

APRA will cease the publication of PoP statistics, and collection of data using ARF 396.0, if the benefit to the public from publication of the statistics does not outweigh the ongoing compliance costs of submitting data on the proposed form.





Telephone  
1300 55 88 49

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

Website  
[www.apra.gov.au](http://www.apra.gov.au)

Mail  
GPO Box 9836  
in all capital cities  
(except Hobart and Darwin)