AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY

GPO Box 9836 In your capital city

W www.apra.gov.au





12 March 2019

Ms Diane Smith-Gander Capability Review Panel c/o The Treasury

Dear Ms Smith-Gander

APRA CAPABILITY REVIEW SECTION 56 OF THE AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY ACT 1998 (APRA ACT)

You have been appointed as a member of the panel to conduct the APRA Capability Review (the Review).

APRA may from time to time disclose protected information and/or produce protected documents to you for the purposes of the Review. For example, protected documents may include information specific to entities regulated by APRA.

Pursuant to paragraph 56(5)(b) of the APRA Act, APRA has approved the disclosure of protected documents and information to you for the purposes of the Review. This letter summarises the terms of that approval, including the conditions imposed by APRA upon your access to and use of such information and documents.

Pursuant to subsection 56(9) of the APRA Act, when APRA discloses protected information and/or produces protected documents to you under the instrument made by APRA, such disclosure or production is subject to the following conditions (these conditions are deemed to be imposed by APRA on each occasion that such disclosure or production occurs):

- 1. protected information and protected documents may be used by you only for the purposes of the Review;
- 2. without limiting paragraph 1 above, protected information and protected documents must not be released by you to any person (except as part of the Review report in accordance with this letter) other than for the strict and sole purposes of the Review, unless APRA gives you its prior written consent;
- 3. you must not use in the Review report comments from a prior APRA staff survey in a manner which would be contrary to assurances previously provided to staff and as such compromise staff confidences;
- 4. the Review report must not expressly refer to individual entities regulated by APRA. However:

- a. If an APRA regulated entity has already been subject to public coverage in a context relevant to the Review (e.g. in the CBA Prudential Inquiry or by the Royal Commission) then an express, appropriate and relevant reference to that entity in the Review report may be made:
- A reference to APRA's general approach to regulating an industry, or to a number of regulated entities as a class, may be made in the Review report; and
- c. Subject to paragraph 5 of this letter, an express, appropriate and relevant reference to a regulated entity in the Review report may be made where considered necessary by the Panel for the purposes of the Review.
- You must provide APRA with a reasonable opportunity to make a submission to you on any proposal to refer to a specific regulated entity in the Review report before the report is made public;
- You must take reasonable care not to prejudice any matters before a Court of law or other tribunal;
- 7. To the maximum extent permitted by law and applicable Government policies, at the conclusion of the Review, all protected information and protected documents must be returned to APRA or destroyed; and
- 8. If you have any concerns or doubts regarding the implementation of these conditions you must promptly raise them directly with APRA.

Please note that upon receiving or having access to protected information or a protected document you will be an "officer" as defined in s 56 of the APRA Act and therefore subject to the obligations imposed upon an officer by s 56.

In this letter:

"panel" means the panel established to conduct the Review;

"protected information" and "protected document" have the meanings respectively given in s 56 of the APRA Act.

Yours sincerely

MELISANDE WATERFORD

General Manager Strategic Programs

AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY

GPO Box 9836 In your capital city

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FOI 2525

12 March 2019

Mr Graeme Samuel AC Chair Capability Review Panel c/o The Treasury

Dear Mr Samuel

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Yours sincerely

MELISANDE WATERFORD General Manager

Strategic Programs

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FOI 2525

12 March 2019

Mr Grant Spencer Capability Review Panel c/o The Treasury

Dear Mr Spencer

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Yours sincerely

MELISANDE WATERFORD General Manager

Strategic Programs

From: Waterford, Melisande (APRA - Protected)

To: "Graeme Samuel (Monash)"; "Diane Smith-Gander"; \$ 47F

Cc: <u>Tease, Warren</u>

Subject: FW: First Review Draft [SEC=UNCLASSIFIED]

Date: Thursday, 13 June 2019 5:45:51 PM

Attachments: image001.png

CR COVER NOTE.DOCX
Summary tables of evidence.docx

Dear Panel

Thank you for the opportunity to provide comments on the draft Report. We have prepared the attached material, that was provided to the Secretariat in tranches earlier today.

Where we have raised issues with the text in the report, we have provided supporting evidence and facts to support our position.

We will engage further with the Secretariat on matters of detail in the coming days.

We look forward to discussing on Monday, however Wayne has indicated he would be available for an earlier call if this would be helpful to you.

Kind regards

Melisande

MELISANDE WATERFORD

General Manager, Strategic Programs

D 02 9210 3115 | E melisande.waterford@apra.gov.au

AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY

1 Martin Place (Level 12), Sydney, NSW 2000 GPO Box 9836, Sydney, NSW 2001 T 02 9210 3000 | W www.apra.gov.au

Title: Australian Coat of Arms and APRA logo



From: Tease, Warren [mailto:Warren.Tease@treasury.gov.au]

Sent: Friday, 7 June 2019 1:16 PM

To: Waterford, Melisande < Melisande. Waterford@apra.gov.au >

Cc: 'Graeme Samuel (Monash)' s 47F ; s 47F

'Diane Smith-Gander' s 47F

Subject: First Review Draft [SEC=UNCLASSIFIED]

Importance: High

Melisande,

Please find enclosed a first draft of the review for comment.

Some observations:

- Please return comments by **c.o.b. Thursday 13 June**;
- Comments should be limited to factual corrections, consistent with the guidance at yesterday's meeting;
- We will consolidate the comments for the Panel for the meeting with the Members on Monday 17 June;
- This is a first draft. It requires more polishing. We will do that in the next few weeks.

Regards

Warren

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From: Waterford, Melisande (APRA - Protected)

To: graeme.samues 47F

Cc: <u>Tease, Warren</u>

Subject: FW: Supervision presentation [SEC=UNCLASSIFIED]

Date: Monday, 8 April 2019 10:40:24 AM

Attachments: <u>image001.png</u>

APRA framework for prudential supervision - Capability Review.pptx

@apra.gov.au

From: S 22

Sent: Monday, 8 April 2019 10:38 AM

To: Waterford, Melisande

Subject: Supervision presentation [SEC=UNCLASSIFIED]

s 22

Advisor, Strategic Programs Group

D 02 **s 22**

AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY

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APRA's prudential supervision model

Sharyn Reichstein General Manager, Supervisory Applications & Solutions



Agenda

- 1. Overview
- 2. APRA's current supervision model
- 3. Governance, reporting and quality assurance
- 4. Supervision model review



Overview

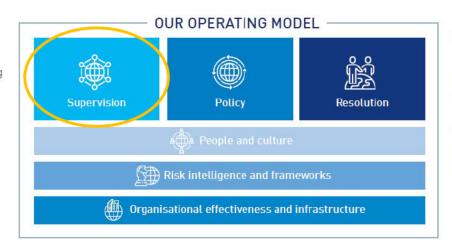
How we fit into APRA's Strategy



APRA'S STRATEGY 2018-2022

OUR MANDATE

We protect the Australian community by establishing and enforcing prudential standards and practices designed to ensure that, under all reasonable circumstances, financial promises made by institutions we supervise are met within a stable, efficient and competitive financial system.



OUR VISION

To deliver a sound and resilient financial system, founded on excellence in prudential supervision.

OUR VALUES

Integrity Respect Collaboration Excellence Accountability

OUR STRATEGIC PRIORITIES

Broaden risk-based supervision

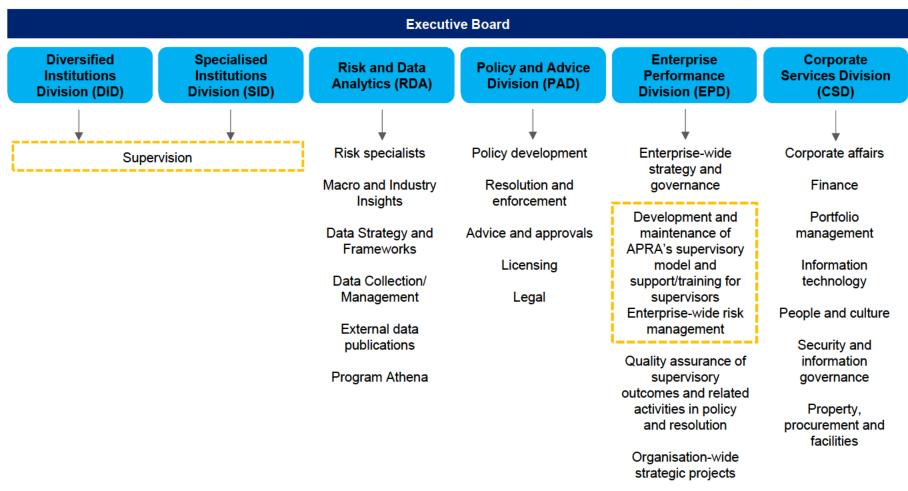
mprove data-enabled decision-making Build resolution capability

Strengthen external engagement and collaboration Enhance leadership, people and culture

Lift organisational capability

Where we sit in APRA's organisational structure





Snapshot



1. Our role

APRA is a supervision-led organisation and derives its mission and vision directly from its mandate.

2. Expectations

The expectations of APRA are significant and heightened following the Royal Commission and other external events. It follows that the public would expect APRA to be at the leading edge of supervisory practice.

3. Our capabilities

APRA's supervision approach is supported by the three core capabilities detailed in APRA's 2018-2022 strategic plan. A major review of APRA's supervision philosophy and model is underway as one of the key initiatives within the strategic plan. This review is designed to achieve a strengthened, contemporary supervision model that is fit for purpose and for the future, and better able to respond to a changing environment.

4. Outcomes

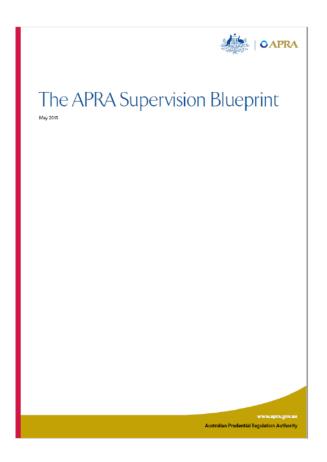
Our supervision model is fundamentally sound and has held us in good stead over time. The model has evolved in response to the shifting landscape and the major review underway is designed to continue this evolution.



APRA's current supervision model

APRA's Supervision Blueprint





Evolved over time

Fundamentally sound

Requires adaptation and strengthening in response to changed practices, new and emerging risks and the shifting environment

APRA's Supervisory Approach



Risk-based

Directing supervisory resources and activities to the areas of greatest risk or impact.

Forward-looking

Using data and other information to anticipate emerging risks and an entity's preparedness to handle them.

Outcomesfocussed

Focussing on the achievement of a supervisory outcome, rather than merely follow a process.

Principlesbased Recognising the complexity and diversity of the financial sector by setting high-level principles for entities to comply with, complemented by prescription where appropriate.

consistent with APRA's values
Integrity, Collaboration, Accountability, Respect, Excellence

Supervision cycle





Supervision cycle & risk appetite

OAPRA

No tolerance for lack of action by supervisors in response to an institution that has not demonstrated honesty and openness or where there is a material problem at the institution

Will not tolerate the failure by responsible APRA staff to act in a timely manner to avert/minimize an institution failure or significant industry issue once we have relevant information available



Not willing to tolerate impaired understanding of a material risk associated with a particular institution or industry

Moderate tolerate for less frequent supervisory interaction with smaller and lower risk institutions provided there are no known issues or problems that require attention

Supervision cycle



RISK IDENTIFICATION

Supervision activities, analysis and findings



Quarterly Financial Analysis

Analysis of the institution's submitted quarterly financial data in the context of other information (e.g. budgets, capital plans) and industry and market related insights.



Other Supervision Activities

A broad range of activities, including analysing specific information requested from a regulated entity, information that is requested from regulated entities to support industry analysis, and targeted inquiries.



Prudential Engagement

Can take the form of a Prudential Meeting, a Prudential Consultation or a Prudential Review. Supervisors determine which form of engagement is most appropriate. Includes Board and Board Chair engagements.

Thematic Review

A coordinated supervisory activity targeting multiple institutions concurrently that enables APRA to assess and respond to an industrywide risk or area of concern present in one or more industries.

Home Regulator Contact

04

For foreign owned subsidiaries and branches of foreign institutions, supervisors should maintain contact with the home regulator.

Lodgement Analysis

The review of information mandated by Prudential Standards to be submitted to APRA such as external audit reports and actuarial reports

Risk Identification – Baseline Requirements



Absolute minimum level of supervision needed to gain a satisfactory understanding of an entity's risk profile.

Activities		Impact Rating		Tolerance		
Activities		Extreme	High	Medium	Low	
Prudential Engagement						
Options:Prudential Meeting;or	ADI, GI, LI, PHI and Super (excluding FABs)	12 months as a Prudential Consultation		12 months		3 months
• Prudential	FABs		24 m	onths		3 months
Consultation; or Prudential Review	Other		36 m	onths		3 months
Other Baseline Activities						
Contact with home regulator (for foreign-owned entities)		12 mon	ths	24 mc	onths	3 months
Financial Analysis (excluding SAFs and single member ADFs)	ADI, GI, LI, PHI, Super and Other (for Foreign ADI Branches supervised by SID FAB team see below*)	Quarterly			N/A	
member Abray	*Foreign ADI Branches (supervised by SID FAB team)	Quarte	erly	Half-Yearly	Annually	N/A
Lodgement Analysis		3 months from submission		N/A		
PAIRS (excluding RSE-level PAIRS for superannuation)		12 months			N/A	
Supervisory Action Plan			12 m	onths		N/A

Risk Identification – Quarterly Financial Analysis



Hallmarks of strong financial analysis

Targeted – A risk based approach to analysis that enables the depth of analysis to be tailored reflecting the size, complexity and risk profile of the entity

Forward looking – Past and current performance is used to assess future performance and form a view of current and emerging risks

Benchmarked – Comparisons are made to key benchmarks, such as regulatory limits or supervisory triggers, and comparison to peers where relevant

Integrated – A holistic view of risk(s) to the entity and inter-linkages identified within the data

Risk Identification – Quarterly Financial Analysis



Full Quarterly financial analysis

Period reviewed		SOARS stance
Entity financial or	ıtlook	Positive 🐤 Stable 👢 Negative
Rationale and Any emerging	on the financial outlook for th key drivers for the outlook risks identified should continue to be monitor	e entity over the next 12 months. Highligh red closely in future QFAs
Key risk areas	Current position	Outlook (next 12 months)
Strategy & planning	Assess recent trends in key financial metrics for each area. Include any material unexpected changes or emerging trends in risk indicators.	trends are likely to deteriorate, stabilise or improve over the next 12 months.
Capital	•	
Earnings	•	
Liquidity risk	•	
Credit risk		
Market & investment risk		
Operational risk		
Insurance risk		

Include any specific supervisory actions or follow up activities for issues outstanding and/or any proposed changes to PAIRS and/or SAP Include any specific supervisory actions or follow up activities for issues outstanding and/or any proposed changes to PAIRS and/or SAP

Sign-offs	Name		Date
Prepared by			
Approved by	Sign-offs are in protocols	accordance with the sign-off	

Detailed analysis

PAIRS category e.g. Liquidity Risk

Supervisors should use this section to present the analysis on specific risk areas. A full QFA would generally include some detail on each risk. An abbreviated QFA would include discussion on any areas where exceptions were triggered or where material risks and issues are identified from the analysis of key metrics.

Supervisors are encouraged to be succinct and structure their analysis holistically in terms of the PAIRS categories and any other issues that may arise. See QFA procedure for further guidance.

Attachment

Include a table of key metrics analysed as an attachment. Charts and shorter tables can be incorporated within the detailed analysis where needed.

quarterly analysis, if any

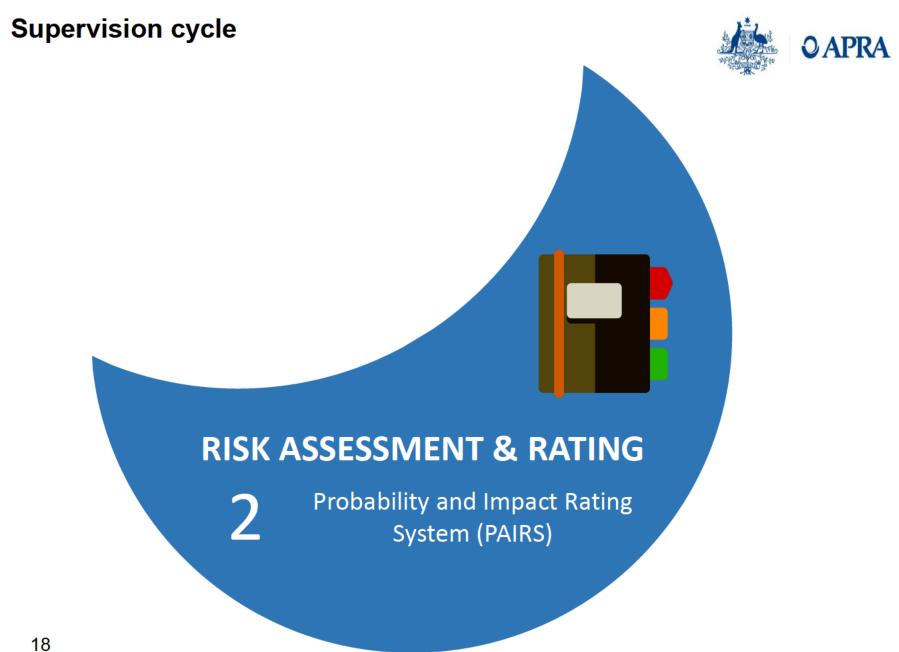
Risk Identification – Prudential Review



Purpose

- Form assessments of key inherent risks and the adequacy of management and controls to address those risks
- Usually targeted at specific risk area(s) relevant to the institution
- Identify risks (where review is not specifically risk-based)

Action from Prudential Review	Description
Requirement	Matters will typically relate to either the entity's failure to comply with legislation or prudential standards, or a fundamental deficiency in the entity's risk management and/or governance practices. The entity must undertake specific action to address the associated matter.
Recommendation	Matters will typically relate to areas of risk management and/or governance that whilst not fundamentally deficient, could be improved. The entity is expected to consider formally the implementation of what is being put forward.
Request for additional information	Matters will typically relate to areas where information was either absent, incomplete or inconclusive. The entity is required to provide that information within the specified timeframe.
Suggestion	This represents the opportunity for the entity to move towards better practice. Subsequent follow-up action in relation to suggestions is usually performed in the context of better practice considerations and does not involve timeframes for implementation.



Risk Assessment - PAIRS



Probability and Impact Rating System (PAIRS)

- Rating tool used to determine the probability of failure of a regulated institution and potential impact on the financial system of the failure.
- Designed to assess risk across all APRA-supervised entities in a consistent manner
- One model covering all industries
- Five probability rating categories
- Four impact rating categories
- PAIRS assessment is required for all licensed institutions. Can also be done
 at the Group/NOHC level at the discretion of supervisory teams.
- PAIRS assessments are reviewed at least every 12 months

Risk Assessment - PAIRS



MANAGEMENT AND CONTROL INHERENT RISK Identify inherent risks by understanding: The process by which an institution identifies, measures, monitors and controls inherent risk the main business activities and strategies of an institution Requires supervisors to review the policies, practices, systems and the entity's risk appetite controls established by the entity for a nature of the products and services particular risk offered Assessment involves determining the effectiveness of the controls in place to mitigate identified inherent risks

Risk Assessment – PAIRS

OAPRA

The probability of failure

PAIRS Category	Inherent Risk	Management a Control	nd	Net Risk	Significance Weight
Board				(0-4)	%
Management		Weight applied to let Risk'		(0-4)	%
Risk Governance				(0-4)	%
Strategy and Planning	(0-4)	(0-4)		(0-4)	%
Liquidity Risk	(0-4)	(0-4)		(0-4)	%
Operational Risk	(0-4)	(0-4)		(0-4)	%
Credit Risk	(0-4)	(0-4)		(0-4)	%
Market and Investment Risk	(0-4)	(0-4)		(0-4)	%
Insurance Risk	(0-4)	(0-4)		(0-4)	%
Net Risk Total				(0-4)	100%
Coverage/ Surplus				(0-4)	%
Earnings		'Net Risk' is the simple average of Inherent Risk and Management and Control		(0-4)	%
Access to Additional Capital				(0-4)	%
Capital Support Total				(0-4)	100%
Overall Risk of Failure				(0-4)	





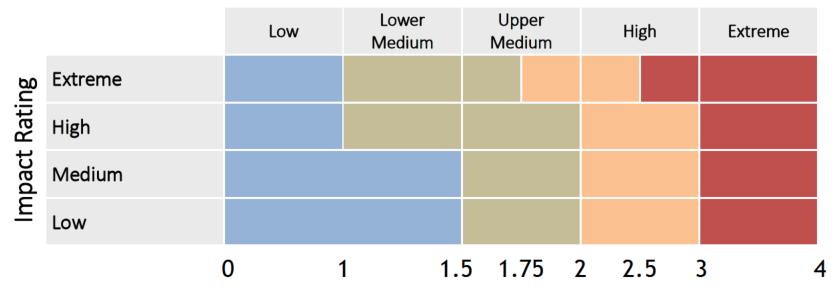


Risk Response - SOARS



Supervisory Oversight & Response System (SOARS)

Probability Rating



Overall risk of failure

Normal
Oversight
Mandated Improvement
Restructure

Risk Response - SOARS



Supervisory approach and intensity

Normal	Ongoing collection and analysis of data supported by prudential reviews.
Oversight	Significant increase in supervision intensity however entity is not considered likely to fail. More frequent information and visits. Board and senior management given strong signals of concern.
Mandated Improvement	Entity produces and executes a remediation plan. Transitional classification. Either improve or exit the industry.
Restructure	Entities have failed or are about to fail. Full use of supervisory and legislative powers to protect beneficiaries.

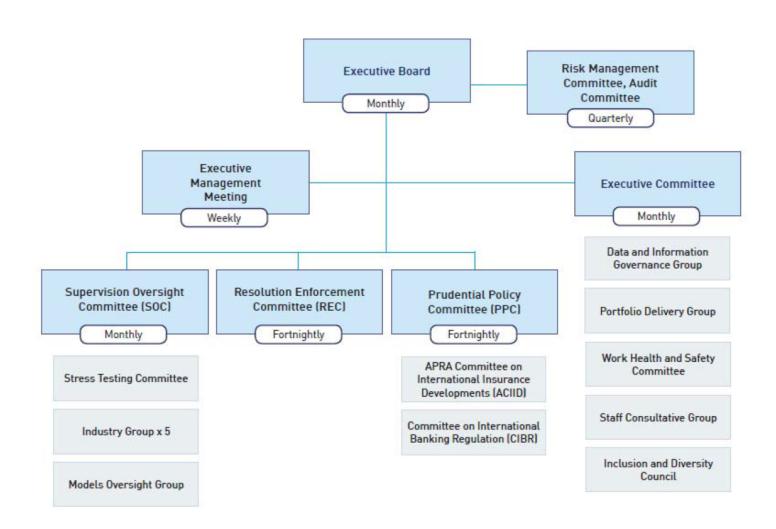




Governance, reporting, controls and quality assurance

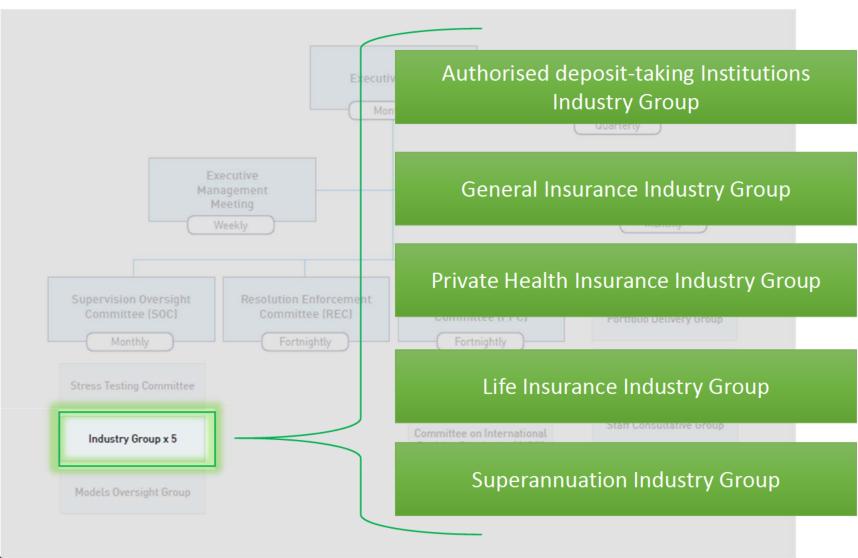
APRA's Governance Structure





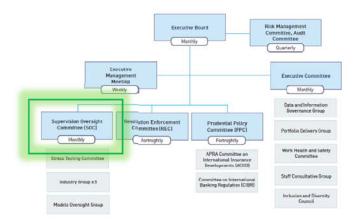
APRA's Governance Structure





Reporting - SOC





Audit items report

 Tracking of action items from both internal and external audit that are overseen by SOC

Frontline Watchlists

 Provide visibility of entities with significant or perceived significant concerns that potentially can lead to significant prudential risks or those that may require enforcement action

PAIRS report

 List of entities in Mandated Improvement, and those that have a SOARS upgrade from Mandated Improvement to Oversight, as well as Oversight entities close to Mandated Improvement

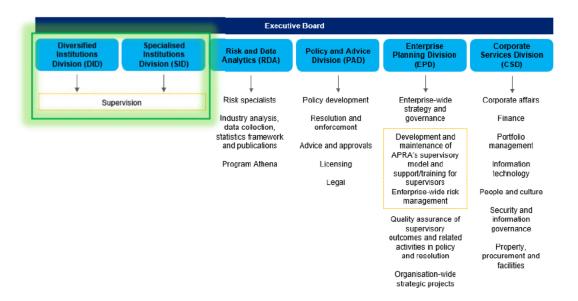
Resource Allocation Report

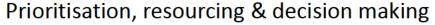
 Analysis of how APRA allocate resources on supervision and non-supervision activities and enforcement related activities

Exceptions based management reporting

 Provide aggregated management view on exceptions, enabling consistent financial metrics to help with business decisions

Reporting – Division level





- Upcoming and overdue tasks
- Resource Allocation reports
- Proactive/Reactive KPI report
- Delegations report
- Watchlists
- Whistle-blowers



Baseline

- PAIRS
- SAPs
- Prudential Engagements
- QFAs
- Lodgement Analysis
- Contact with Home Regulator

Timeliness

- Time taken to send PC/PR report
- Time taken to send PRA (internal report) to frontline
- Time taken to jointly sign PRA (internal report)

Sign-off protocols

Sign off protocols

The sign off protocols below define the minimum level of sign off required for all core supervision activities including prudential reviews, prudential consultations, quarterly financial analysis, lodgement analysis, PAIRS assessments and supervisory action plans. The sign off protocols exclude approvals and interpretations which are captured as part of the decision-making procedures.

Entities not yet in the PAIRS population (e.g. new licensee) require sign off by the GM. In this scenario, for SID Northern Region, sign off is required by the SID EGM.

Low and medium impact entities

		To probability rating					
		Low	Lower Medium	Upper Medium	High	Extreme	
rating	Low	Manager/PA	Manager/PA - Advise SM	SM - Advise GM	GM - Advise EGM ¹	EGM	
bility	Lower Medium	Manager/PA - Advise SM	Manager/PA	SM - Advise GM	GM - Advise EGM ¹	EGM	
From probability rating	Upper Medium	SM - Advise GM	SM - Advise GM	Manager/PA	GM - Advise EGM ¹	EGM	
Fron	High	GM - Advise EGM ¹	GM - Advise EGM ¹	GM - Advise EGM ¹	SM	EGM	
	Extreme	EGM	EGM	EGM	EGM	SM	

High impact entities

		To probability rating					
		Low	Lower Medium	Upper Medium	High	Extreme	
ating	Low	SM ³	SM - Advise GM	GM - Advise EGM ¹	EGM	EGM	
From probability rating	Lower Medium	SM - Advise GM	SM ³	GM - Advise EGM ¹	EGM	EGM	
n proba	Upper Medium	GM - Advise EGM ¹	GM - Advise EGM ¹	SM ³	EGM	EGM	
Fron	High	EGM	EGM	EGM	GM ²	EGM	
	Extreme	EGM	EGM	EGM	EGM	GM ²	

- 1 Entities supervised by SID Northern region require sign off by the Head of Northern region with advice to the SID EGM where required.
- 2 Entities supervised by SID Northern region require sign off by the SID EGM.
- 3 Quarterly financial analysis, lodgement analysis, prudential review and prudential consultation scoping documents, confirmation letters/agendas and management/closure of prudential review findings can be signed off by the Manager / Principal Analyst.
- ** Advice is a post-approval notification. This step is not automated.



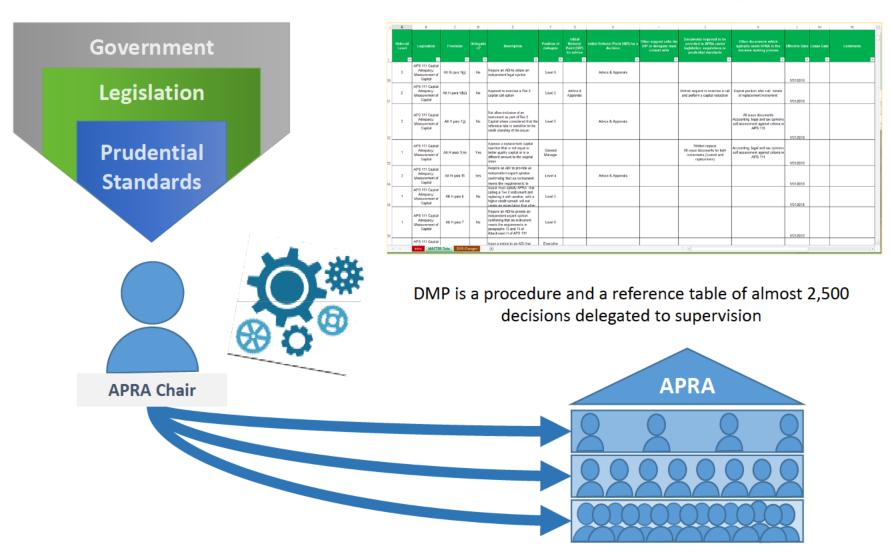
Extreme impact entities

		To probability rating						
	·	Low	Lower Medium	Upper I	Medium	Hi	gh	Extreme
From probability rating	Low	GM ^{1,4}	GM - Advise EGM ¹	GM - Advise EGM ¹	EGM	EGM		EGM
	Lower Medium	GM - Advise EGM ¹	GM ^{1,4}	GM - Advise EGM ¹	EGM	EGM		EGM
	Upper	GM - Advise EGM ¹	GM - Advise EGM ¹	GM1,4	EGM	EGM		EGM
	Medium	EGM	EGM	EGM	GM ²			
							EGM	
	High	EGM	EGM	EGM		EGM	GM ²	EGM
	Extreme	EGM	EGM	EGM		EGM		GM ²
SOARS stance		Normal	Oversigh	ht Mandated Improvement		Re	Restructure	

- 1 Entities supervised by SID Northern region require sign off by the Head of Northern region with advice to the SID EGM where required.
- 2 Entities supervised by SID Northern region require sign off by the SID EGM.
- 4 Quarterly financial analysis, lodgement analysis, prudential review and prudential consultation scoping documents, confirmation letters/agendas and management/closure of prudential review findings can be signed off by the Senior Manager.
- ** Advice is a post-approval notification. This step is not automated.

Decision Making Procedure (DMP)

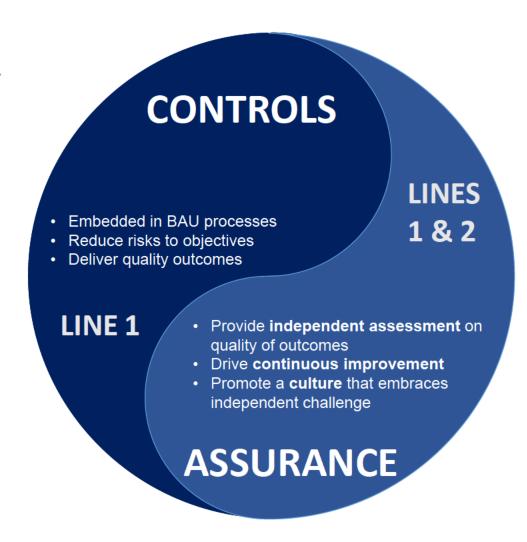




Alignment with Quality Assurance Framework



The supervision framework captures controls and the QA framework captures assurance





Supervision model review



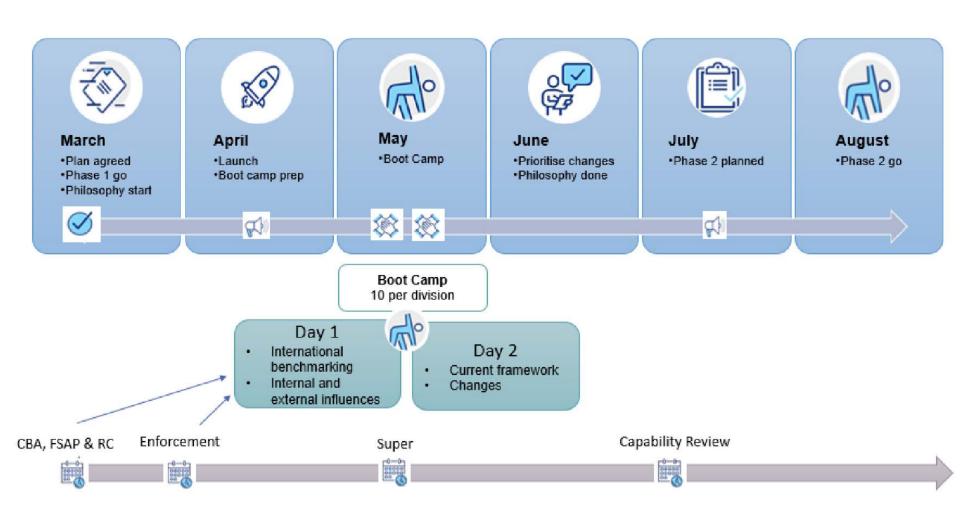
Review of APRA's Supervision model

Supervision Fitness Program

Supervision Fitness Program - Scope OAPRA Philosophy Super External **GCR** Engagement Supervision framework Data **New Entrants** Supervision Structure & **Fitness** resourcing Enforcement Program Capability and culture Independent Challenge Accountability 36

Supervision Fitness Program - Flight Path





Supervision Fitness Program – Flight path (detail)



Philosophy

Current State

Risk-based, outcomes focussed, forward-looking, underpinned by range of key elements documented in 2015 Blueprint

Desired State

Revised statement to set the tone for changes in supervisory approach and mindset

Objective: A clear, contemporary statement from the 'top of house' that provides the expectations, emphasis and direction for our supervisory model.

Activity	Who	When	Status
1. Workshops with Divisional Exec teams	SAS & Divisional Exec teams	Q3 / 18	☑ Done
2. Workshops with Executive General Managers	SAS & EGMs	March 19	☑ Done
3. Draft Philosophy socialised and underpinning elements workshopped	Bootcamp	8/9 May	On-track
4, Draft Philosophy alignment with risk appetite	SAS & EPD	June 19	Not started
4. Finalise Philosophy – short form	SAS & SOC	July 19	Not started
5. Internal communication	SAS	July 19	Not started
6. Finalise Philosophy – long form	SAS & SOC	August 19	Not started





END

Deeper dive @ 1.30pm







