

2021-22

ANNUAL REPORT



CUSTOMER OWNED BANKING
CODE COMPLIANCE COMMITTEE

October 2022

www.cobccc.org.au

About this report

This Annual Report sets out the activities of the Customer Owned Banking Code Compliance Committee (the Committee) between 1 July 2021 and 30 June 2022.

It focuses on the Committee's monitoring work for the 2021-22 period.

It will be followed by the Annual Data Report – a subsequent report that will present analyses of the Code subscribers' self-reported breach and complaints data, observations on Code compliance, and guidance and recommendations for the customer owned banking sector.

We will publish the Annual Data Report in early 2023, after our annual subscriber engagement program concludes in November 2022.

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Message from the Chair

As Chair of the Customer Owned Banking Code Compliance Committee, I am delighted to present the 2021–22 Annual Report.

Despite another year of challenges and uncertainty caused by the COVID-19 pandemic, we once again managed to effectively monitor compliance with the Customer Owned Banking Code of Practice ([the Code](#)).

Customer owned banking institutions and their members have felt the challenges this past year. And they have come in many forms.

Rising inflation presented economic challenges for the sector, and many institutions have continued to address social and environmental issues including climate risk, diversity and financial inclusion.

Of course, as we have all experienced in some way, the ongoing effects of the pandemic have continued to test institutions and their staff.

But opportunities have emerged from the challenges too.

Competition from the burgeoning fintech market has pushed institutions to become more agile. They had to embrace emerging technologies and data sources to improve efficiencies and enhance products and services.

It was a tough year for customers with the pandemic, financial pressures from rising inflation, the increasing cost of living, and natural disasters such as floods and bushfires all presenting difficulties.

Consequently, we expect to see a rise in customers experiencing vulnerability. This emphasises the importance of customer owned banking institutions finding effective ways to support all members, including those experiencing vulnerability.

Own Motion Inquiries (OMIs)

Inquiries are one of our key functions. They enable us to monitor compliance with the Code and provide guidance on existing policies and procedures, which, in turn, helps improve customer service.

OMIs are critical in helping us identify and monitor emerging issues or trends to provide industry with feedback on areas of concern or opportunities for improvement.

We issued an OMI Report this year into vulnerability. This report presented findings from an analysis of how Code subscribers define vulnerability and deal with issues concerning domestic and family violence and elder abuse.

We used the opportunity to provide guidance to subscribers about complying with the new obligations.

Investigations

This year we conducted eight investigations. These investigations each followed an allegation that a subscriber had breached the Code.

The details of the investigations varied, but they shared common underlying themes: issues of process and training for sales practices and dealing with family violence and financial hardship.

Investigations are comprehensive and crucially important for our work. They ensure the specific issues for a subscriber are addressed and they contribute to improvements across the whole sector. They work towards our ultimate goal of ensuring better outcomes for customers.

Improving compliance

The Annual Compliance Statement (ACS) Verification Program is a key part of our role providing guidance to subscribers on Code compliance.

During the year we ran a webinar to assist Code subscribers to effectively complete the ACS. We held video conferences with all subscribers to follow up on their reporting and published our findings in the [Annual Data Report](#).

We provided Code subscribers with individualised Benchmark Reports and presented them with comparative trends that allowed them to review their compliance outcomes and benchmark them against industry and sector performance.

Looking ahead

The 2022 Customer Owned Banking Code ([2022 Code](#)) comes into effect on 31 October 2022.

The Code plays an important role in providing better outcomes for customers, particularly customers in vulnerable circumstances or financial hardship.

The 2022 Code will be a major focus in the coming year. And this year laid the groundwork for its successful implementation.

The Committee met with the Customer Owned Banking Association ([COBA](#)) and its consultant to discuss the transition to the 2022 Code and what that means for Code subscribers. We have also contributed to the practical elements of implementing the 2022 Code by helping COBA with guidance and training material for Code subscribers.

This year we will undertake an Own Motion Inquiry into the transition to the 2022 Code. This will cover the main areas requiring change, post implementation reviews and resources Code subscribers need to maintain compliance.

Acknowledgments

I'd like to thank my Committee colleagues, Cindy Hansen and Philip Cullum, for their valuable insight and positive contributions during the year.

I would like to welcome Prue Monument as the new General Manager of Code Compliance and Monitoring, and congratulate René van de Rijdt on taking on the new role of Deputy General Manager.

I'm also grateful for the support of our Code team at AFCA, with our Code Compliance and Operations Manager, Daniela Kirchlinde, having been pivotal in delivering support to the Committee throughout the year.

I look forward to another busy and productive year in 2022–23.

A handwritten signature in cursive script that reads 'Jocelyn Furlan'.

Jocelyn Furlan
Independent Chair
Customer Owned Banking Code Compliance Committee

The customer owned banking industry

Customer owned banking institutions service a large section of the Australian population. According to [KPMG's Mutual Industry Review 2021](#), they serviced 18% of the Australian population.

Our Code subscribers

As of 30 June 2022, there were 55 Code subscribers with over 700 branches across Australia.

We categorise companies according to the value of assets they manage. See our [full register of subscribers](#).

Code subscribers by category, state (head office) and size of operation

Category as per \$ amount in assets	NSW	NT	Qld	SA	Tas	Vic	WA	Total
AA (over \$5b)	2	-	2	2	-	1	1	8
A (\$2b to \$5b)	3	-	2	-	-	2	-	7
B (\$1b to \$2b)	6	-	-	2	1	2	-	11
C (\$500m to \$1b)	6	-	2	-	-	1	-	9
D (\$200m to \$500m)	7	-	2	-	-	2	-	11
E (less than \$200m)	4	1	-	1	-	3	-	9
Total	28	1	8	5	1	11	1	55

Number of branches (including head office) by state and size of operation

Category	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	Total
AA	10	106	5	79	41	0	30	27	298
A	6	55	3	55	2	0	10	3	134
B	-	59	1	3	141	8	17	2	231
C	-	28	-	6	-	-	10	9	53
D	-	23	-	14	1	-	3	1	42
E	-	12	14	-	1	-	7	1	35
Total	16	283	23	157	186	8	77	43	793

Snapshot of our work

We investigated

1 OWN MOTION INQUIRY

How Code subscribers define vulnerability and deal with issues concerning domestic and family violence and elder abuse.

8 INDIVIDUAL CODE BREACH ALLEGATIONS

We analysed

- **Annual Data Report** – analysis of the self-reported data from Code subscribers in the 2020–21 ACS and our follow-up discussions with them.
- **Benchmark Reports** – individual Benchmark Reports for all Code subscribers that allow them to measure their compliance against other institutions and the industry as a whole.
- **Learning by Example Report** – a report based on self-reported Code breaches that provided important guidance and lessons to Code subscribers.

We engaged

6 PUBLICATIONS

Including reports, media releases and insight articles.

ENGAGEMENT with COBA and the Code reviewer for the **finalisation of the 2022 Code**.

70+ STAKEHOLDER ENGAGEMENTS

including a presentation at the COBA CEO & Director Forum

4 WEBINARS:

- Assisting Code subscribers complete the Annual Compliance Statement
- Introduction to the 2022 Code for subscribers (2-part webinar)
- COBA's Consumer Forum

We investigated

The Committee can investigate an allegation that a Code subscriber has breached its obligations under the Code.

Our investigations aim to identify:

- the cause of alleged Code breaches
- whether breaches indicate broader compliance issues, and
- the effectiveness of a Code subscriber responses to minimise the impact of breaches on customers.

Following a review of an alleged Code breach, we expect a Code subscriber to:

- positively engage with us
- review the issue thoroughly to decide if it constitutes a breach
- report identified breaches in its breach register
- report identified breaches to executive management
- identify all customers potentially affected
- assess whether the identified breach is systemic or significant
- take action to address the non-compliance
- review and enhance processes and procedures, and
- train staff and authorised representatives in response.

We receive few individual referrals of breach allegations. Most customers seek financial compensation, and these complaints are handled by the Australian Financial Complaints Authority ([AFCA](#)).

We cannot award financial compensation. Instead, we focus on working with Code subscribers to improve processes and procedures, initiate effective staff training and awareness, and cultivate a positive culture towards reporting breaches and complaints.

Own Motion Inquiries (OMIs)

We also undertake our own inquiries – referred to as ‘Own Motion Inquiries’ (OMIs) – which do not depend on a specific allegation.

OMIs form most of our investigation work. Committee-initiated investigations are mainly used to:

- identify non-compliance
- assess how widespread the non-compliance is, and
- determine if there are emerging risks that may affect other Code subscribers or customers.

OMI Report: Vulnerability – June 2022

We conducted an inquiry into how subscribers approach vulnerability and deal with issues concerning domestic and family violence and elder abuse.

The 2022 Code, unlike the 2018 Code, includes specific obligations for treating different types of vulnerability.

Our inquiry sought to understand Code subscribers' approach to vulnerability as they prepare to meet obligations under the 2022 Code.

Key findings

- Many Code subscribers have established frameworks for addressing vulnerability, but they will need to do more to comply with the 2022 Code.
- Many Code subscribers prioritise customers experiencing elder abuse.
- Most Code subscribers provided little explanation for how they identify and respond to customers experiencing domestic or family violence.
- Few Code subscribers have policies and processes covering each of the vulnerable circumstances outlined in the 2022 Code.
- Code subscribers rely heavily on frontline staff to identify vulnerability, and most provide staff with specialised training.
- Code subscribers say they have robust policies and processes for managing Powers of Attorney.
- One in four Code subscribers report vulnerability matters to their Board or executive committee, but the focus is usually on the financial effects.
- One in five Code subscribers has a dedicated team or staff member to manage vulnerability.
- Fewer than one-third of Code subscribers have partnered with a community organisation that specialises in helping vulnerable people.

While the inquiry found many Code subscribers have made significant progress in meeting the more stringent vulnerability obligations under the 2022 Code, some may need to improve support for customers.

We would like to see all institutions sharpen their focus on providing better outcomes for vulnerable customers by introducing specific documented policies and processes. It is also important to provide staff with specialised training, so they are better equipped to recognise and manage vulnerability in customers.

Boards of Code subscribers should take a more strategic and proactive role on this. Code subscribers should work with external support services and community organisations on responding to the needs of vulnerable customers.

Investigations of individual breach allegations

In 2021–22 we conducted eight investigations concerning alleged breaches of the Code – two were new matters and six were carried over from 2020-21.

Of the eight matters investigated in 2021–22:

- six cases related to consumer credit products
- one case related to a current account
- one case related to a savings account
- four cases were brought by the customer
- three were referred from AFCA’s systemic issues team, and
- one was raised by the Committee.

While we did not identify any actual breaches as a result of our investigations, we noted five matters for future monitoring in our Priority Monitoring Framework. These matters concern:

- process and training for sales practices, and
- dealing with family violence and financial hardship.

Three matters remained open as at 30 June 2022.

We continued to monitor a legacy product from one Code subscriber following an investigation in a previous year. While this matter is closed, as part of the resolution, the subscriber accepted an undertaking at the Committee’s request to provide ongoing six-monthly reports.

Details of investigations

Details as at 30 June 2022	Number of investigations
Total Investigations	
Open investigation matters as at 30 June 2021	6
New investigation matters received during 2021-22	2
Status of Investigations as at 30 June 2022	
Closed as at 30 June 2022	5
Open as at 30 June 2022	3
Status of open Investigations as at 30 June 2022	
In decision status	2
On hold – awaiting outcome of AFCA investigation	1
Age status of open Investigations as at 30 June 2022	
More than 60 days since registration	3
Source of Investigations	
Direct contact by customer	4
Referral from AFCA systemic issue team	3
Own motion investigation initiated by the Committee	1
Sections of the Code investigated (note: some investigations included more than one provision)	
Section D1 'Advertising'	1
Section D6 'Reviewing fees and charges'	2
Section D11 'Safeguards for co-borrowers'	1
Section D13 'Third party products and services'	1
Section D15 'Timely, clear and effective communication'	2
Section D22 'Closing your account'	1
Section D23 'Information privacy and security'	1
Section D24 'If you are in financial difficulties'	3
Section D27 'Prompt, fair resolution of complaints'	1
Section D28 'Complaint handling process'	2
Types of products, services and/or issues involved in Investigations (as per ASIC's IDR Reporting Handbook)	
Consumer Credit – Home Loan (ASIC ref 15)	5
Consumer Credit - Personal Loan (ASIC ref 20)	1
Current Account – Personal Transactional Account (ASIC ref 31)	1
Savings Account - Term Deposit (ASIC ref 38)	1
Outcome of the closed Investigations	
No breach identified, but noted for future monitoring	5

We analysed

Annual Data Report 2020–21

Our [Annual Data Report 2020-21](#) supplements the summary data published in the [Annual Report 2020-21](#) of March 2021.

It contains a data analysis of the self-reported breaches and complaints in the 2020–21 ACS and our subsequent discussions with Code subscribers.

The Report outlines our observations about Code compliance, shares useful examples of good practice, and has important recommendations for Codes subscribers.

Findings

Data showed that breach numbers fell for the first time in six years, with Code subscribers reporting 2,248 Code breaches (down 11%).

However, there was a small rise in the number of Code subscribers reporting one or more breaches.

More than 568,000 customers were affected by the breaches, with a total financial impact exceeding \$9 million.

The Code provisions most breached related to privacy, customer service, and legal and industry obligations. Privacy issues accounted for one in three self-reported breaches.

We noted some improvements in reporting processes. More accurate reporting resulted from Code subscribers assessing breaches against specific Code obligations rather than catch-all requirements such as ‘customer service’. Programs to improve compliance, as well as upgraded reporting tools, often led to improved data, especially when underpinned by strong compliance policies and staff training.

It was concerning that 15 Code subscribers reported no breaches and others reported very low numbers. This can indicate a flaw in detection or reporting systems. Almost all the reports of no breaches were from Code subscribers with less than \$500 million in assets, which typically relied on a single source of identification, usually a breach and complaints register. Our report includes a number of recommendations to remedy this.

We were also disappointed to find that Code subscribers did not specify a short-term remedial action for one-quarter of all breaches and did not provide details for long-term remedial action for three-quarters of all breaches.

The report reminds Code subscribers that breach information is a valuable source of intelligence that can improve practices and prevent future breaches.

Self-reported complaints rose by almost 10% to 29,650. Code subscribers attributed the rise mainly to the result of implementing changes to comply with ASIC’s new guidance for resolving internal disputes.

Code subscribers also reported an increased focus on training for staff and customers to combat the growing prevalence of scams, fraud and other criminal activity.

The Committee urges Code subscribers to review and share the findings and guidance provided in the Annual Data Report 2020–21 to help improve compliance monitoring and reporting, as well as all aspects of day-to-day business practice.

Learning by Example Report

Based on a selection of self-reported breaches, we published [Learning by Example](#) – a report that presented useful examples of compliance in practice and lessons for Code subscribers.

We urge all Code subscribers to use the examples in the report in discussions about improvement.

Some key points:

- Consider all potential sources of information about breaches rather than relying too heavily on complaint and incident registers. Breaches can be identified through audits, reviews of policies or procedures, quality assurance processes, and third-party feedback.
- Record all complaints, including dissatisfaction with a third party's product or service. A culture and framework supporting complaints reporting is essential, as is staff training and communication.
- Privacy breaches from human error highlight the need for ongoing training, as well as routine alerts and reminders for staff. Privacy breaches from a system error show that it's essential to regularly check and test systems.
- Advise customers when they are affected by a privacy breach. To maintain trust, make sure to explain how the breach was rectified.

Self-reported breaches and complaints 2021–22

Assessing compliance with the Code is a key element of our monitoring activities.

Each year, Code subscribers report breaches and complaints to us via the ACS. The information we receive about how and why a Code subscriber has breached the Code helps us identify current and emerging risks. This helps us provide guidance to Code subscribers.

The 2021–22 ACS data is due 30 September 2022 and the verification program will be conducted with all Code subscribers throughout the 2022 calendar year. A detailed analysis of the self-reported data will not only be used to help identify any emerging risks and trends in compliance but also draw out examples of good industry practice. The report will be published in early 2023.

The 2021–22 ACS will also be used as guidance to assist Code subscribers with the transition to the 2022 Code.

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Priority Monitoring Framework

We play a critical role in helping Code subscribers improve their service to customers.

We do this by:

- assessing compliance with the Code
- highlighting risks and good practices, and
- guiding subscribers on improving compliance and, ultimately, outcomes for customers.

Our Priority Monitoring Framework (PMF) underpins this work. It sets out the elements of our monitoring and identifies priority areas of focus.

We use the PMF to collect and analyse information from a range of sources:

- Data on self-reported breaches and complaints from Code Subscribers
- Breach reports from Code subscribers
- Allegations of Code breaches from customers or consumer representatives
- AFCA's Data Cube
- Our inquiries and investigations
- Engagement with stakeholders, and
- Public sources such as media, reports, research and analysis.

The PMF ensures we use our resources effectively and conduct crucial aspects of our work with rigour and consistency.

We engaged

We engage with stakeholders to analyse the financial services environment, share knowledge of and insights into Code compliance, and influence positive changes in conduct.

This work includes:

- empowering consumers to access their rights under the Code
- supporting Code subscribers to comply with the Code, and
- providing training to help industry and consumers understand their rights and responsibilities under the Code.

Our contribution to the development of the 2022 Code

Throughout 2021–22, we continued to write to and consult with COBA and the Code Review Consultant to provide our views on the 2022 Code. We continue to work with COBA to deliver the 2022 Code, effective 31 October 2022.

We also continue to support Code subscribers as they transition to the 2022 Code.

Implementing any necessary changes to our role under the 2022 Code and our Charter will be a priority in the short term.

Stakeholder engagement

Engaging with stakeholders was a vital part of our work and success in the past year.

We met with Code subscribers, industry representatives, regulators and consumer advocates throughout 2021–22, including meetings with senior staff from:

- AFCA
- COBA
- ASIC, and
- Financial Counselling Australia.

We engaged directly with subscribers throughout the year. We discussed issues of compliance in depth as part of our ACS Verification and provided each with an individual Benchmark Report. This engagement is a core element of our work improving compliance in the sector and outcomes for customers.

Given the ongoing restrictions to travel and in-person gatherings as a result of the pandemic, our members had limited opportunities to attend industry conferences and events over the past year.

However, we were pleased to participate in a number of key industry conferences in 2021–22, including:

- Virtual COBA Convention (November 2021)
- COBA CEO and Director's Forum on the Gold Coast (March 2022)
- COBA Consumer Forum (May 2022), and
- Financial Counsellors Association (FCA) National Conference in Cairns (May 2022).

About the Committee

As the Committee for Customer Owned Banking Code Compliance, we are an independent monitoring body established in accordance with Part E of the Customer Owned Banking Code, under the authority of COBA.

The Committee Charter provides for us to undertake the following functions:

- monitor compliance of the Code
- investigate allegations of breaches of the Code and make determinations
- conduct investigations
- provide guidance on compliance with the Code to subscribers, and
- publish an Annual Report on our activities, including information as per clause 13.1 of the Charter.

Committee Members

As a Committee, we comprise of three members: an independent Chair, an Industry Representative and a Consumer Representative.

In 2021–22, we met formally five times. Members also held meetings with COBA, regulators, ombudsmen and consumer advocates. The Chair also meets with COBA's Chair, Directors and CEOs from time to time.

Compliance Manager

AFCA provides us with Code monitoring and administration services by agreement. AFCA has a dedicated team within its office to undertake these activities.

What drives us

Our principles, purpose, objectives and desired outcome.



The Committee members

Jocelyn Furlan – Chairperson

Appointed: 19 February 2019 **Term expires:** 19 February 2025 (last term)

Jocelyn is Principal of Furlan Consulting, a non-executive director of Financial Counselling Australia, Aware Super and Perpetual Superannuation Ltd. She is the Chair of the Board of Strathcona Baptist Girls Grammar School and Sport and Life Training Ltd (SALT).



She was the Chairperson of the Superannuation Complaints Tribunal for eight years from 2007 until March 2015. Since April 2015 she has provided consulting services, principally in the area of dispute resolution, including to the Commonwealth Bank of Australia's financial advice remediation programs. Jocelyn has more than 30 years' experience in superannuation and remains passionate about empowering Australian consumers in their financial affairs. She holds degrees in both law and commerce, is a graduate of the Australian Institute of Company Directors (AICD) and a member of numerous superannuation industry associations.

Cindy Hansen – Industry Representative

Appointed: 1 January 2020 **Term expires:** 31 December 2025 (last term)

Cindy is the General Counsel & Company Secretary for Qudos Bank and has more than 25 years' experience in the finance industry, specialising in legal, compliance, and governance in retail banking and consumer finance. She also holds voluntary positions within the mutual and financial services sectors, including as an Elected Councillor for HCF, a Director of the Australian Finance Industry Association (AFIA) and a member of the FINSIA Retail and Business Banking Industry Council.



Cindy holds a law degree, a graduate diploma in finance and investment, and is a graduate of the AICD. She is proud to be a signatory to the Banking & Finance Oath.

Philip Cullum – Consumer Representative

Appointed: 29 February 2020 **Term expires:** 28 February 2026 (last term)

Philip is an experienced regulator and consumer advocate, based in Melbourne. He set up Consumer-wise Consulting, working on strategy, policy, engagement and governance. He is a member of the Boards of the Financial Basics Foundation (which he chairs), Clean Energy Council, Consumer Action Law Centre and Consumers' Federation of Australia, as well as being a member of the expert panel at the financial ombudsman AFCA and chair of the Customer Advisory Panel for the energy networks Powercor, Citipower and United Energy. He is a graduate of the AICD.



He previously worked at the Australian Energy Regulator, the Australian Competition and Consumer Commission and the UK energy regulator Ofgem. In the UK he also held senior roles at three consumer organisations and worked as an associate partner at Accenture. He was a member of advisory committees in financial services, food safety, aviation and water, as well as cross-sectoral bodies advising UK ministers on better regulation.

The Compliance Manager

Prue Monument – General Manager, Code Compliance and Monitoring

Appointed: 15 November 2021 – current

In this role, Prue leads the strategic direction and operational management of the Code team, ensuring delivery of its compliance and monitoring obligations for relevant industry associations and five independent Code Compliance Committees across the banking, customer owned banking, general insurance, life insurance, and insurance broking industries.



Prue previously worked at the Tertiary Education Quality and Standards Agency (TEQSA) as Executive Director Quality Assurance & Regulatory Operations. In this role she was responsible for all of TEQSA’s regulatory work, compliance monitoring, investigations, risk analysis and enforcement, as well as overseeing Australian Higher Education providers’ compliance with quality and governance standards and the National Code of Practice. Prue was previously Director of Compliance at the Australian Charities and Not-for-profit Commission where she was responsible for all compliance, investigations and intelligence work across Australia’s 56,000 charities. Prue has previously held senior roles in the Department of Immigration and Border Protection including as National Manager of the Allegations Assessment Team and postings in Beirut and Shanghai. Prue has an Executive Masters in Public Administration and rich experience in regulation and self-regulation as well as complex stakeholder relationships.

René van de Rijdt – Deputy General Manager

Appointed: 15 November 2021 – current

Prior appointments: 5 March 2021 – 15 November 2021 acting General Manager
From January 2017 - March 2021 Investigations Manager



René van de Rijdt has taken on a new role as Deputy General Manager which recognises the tremendous role that he played as Acting General Manager following Sally Davis’ departure in March 2021. This position ensures that he will play an enhanced role in leading the team and its work.

René has worked in the Code team since 2017, initially as the Code Compliance Investigations Manager, and at AFCA and its predecessor schemes since 2011. René has a background in law and external dispute resolution and holds a Bachelor of Law from Monash University and a Bachelor of Planning and Design from the University of Melbourne.

Daniela Kirchlinde – Code Compliance and Operations Manager

Appointed: October 2009 – current

In addition to this role, Daniela also manages compliance for the Insurance Brokers Code of Practice. Prior to her current role, Daniela worked as Complaints and Compliance Manager at AFCA and its predecessor schemes from 1995.



Daniela has a background in dispute resolution and broad insurance industry experience in Australia, England and Germany. She holds a Bachelor of Commerce from the Cologne University (Germany) and a Graduate Diploma in Finance and Investment from the Australian Securities Institute Melbourne.

About the Code

The Customer Owned Banking Code of Practice sets good standards of practice for the 55 Code subscribers that have agreed to follow it.

By subscribing to the Code, Code subscribers commit to uphold good industry practice, promote informed decision-making about their services, and act fairly and reasonably in delivering those services.

The Code is owned and published by COBA – the industry association for Australia’s customer owned banking sector – and forms an important part of the broader national consumer protection framework and financial services regulatory system.

Following a review that began in 2018, COBA developed an updated version of the Code effective 31 October 2022.

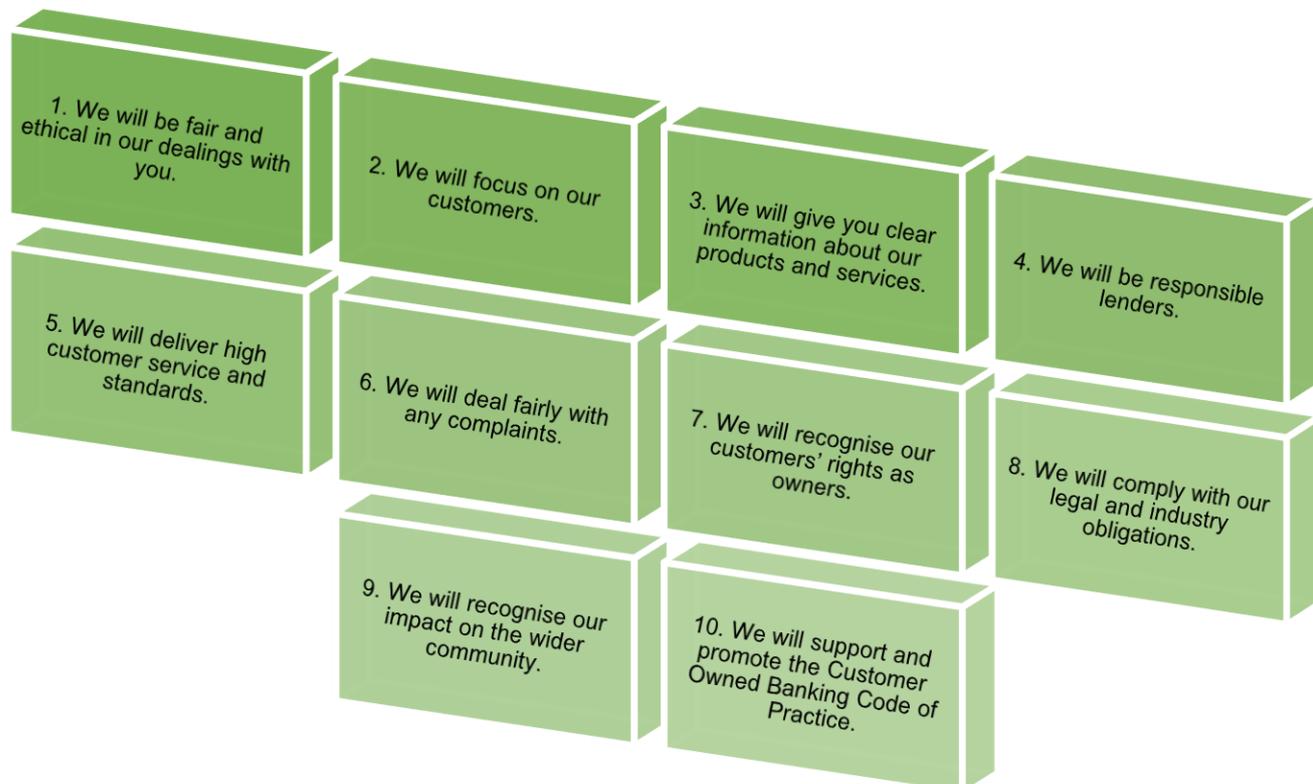
Key Promises

The 2018 Code sets out 10 Key Promises – general principles or values that apply to the way Code subscribers deal with all customers, as well as the broader community.

Code subscribers commit to these Key Promises, which apply to all services they deliver to individuals and small business across Australia.

The 2018 Code consists of five parts. Part A, B, C and E provide the important framework of the Code. Part D includes 30 specific sections that detail how subscribers are to deliver on the promises.

The 10 Key Promises



Financial details for the period 1 July 2021 to 30 June 2022

Customer Owned Banking Code Compliance Committee financial details for the period 1 July 2021 to 30 June 2022:

Financial details 2021-22

	30 June 2021	30 June 2022
Staff costs	Based on 1.75 FTE	Based on 2.0 FTE
Gross salaries (including Committee remuneration), leave provisions, Super, training and recruitment	\$318,650	\$340,602
Operating expenses		
Professional Assistance	\$21,614	\$25,014
Communications, Stakeholder Relations & Travel ¹	\$3,125	\$3,957
Technology	\$15,757	\$25,752
Occupancy and Office Costs	\$18,548	\$21,290
Total Salaries and Expenses	\$377,694	\$416,615
Total Funding from COBA	\$364,056	\$413,513
Allocated funds from operating reserve	\$20,000 ²	-
Annual Surplus / (Deficit)	\$6,362	(\$3,102)
Allocated funds from operating reserve	-	3,102³
Closing Operating Reserve	\$51,959	\$48,857

¹ Reduced expenses due to COVID-19 travel restrictions.

² Allocation of \$20,000 from operating reserve 30 June 2020 to reduce costs to COBA for the 2020-21 period as agreed by the Customer Owned Banking Code Compliance Committee on 5 August 2020.

³ Allocation of \$3,102 from operating reserve 30 June 2020 to fund deficit for the 2021-22 period as agreed by the Customer Owned Banking Code Compliance Committee on 17 August 2022.