

**From:** Dudley John Mills [REDACTED]  
**Sent:** Friday, 21 April 2023 4:35 PM  
**To:** Financial Services Competition  
**Subject:** Different rates for personal, SMSFs, companies; redundant application processes.

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Commission,

Thank you for requesting input from depositors: <https://www.accc.gov.au/media-release/accc-seeks-views-on-competition-and-consumer-issues-affecting-australian-savers>

My wife & I are fully self funded retirees. Aged 75 & 74 we have no need to risk our retirement in the mercurial 'securities' market so are heavily invested in government guaranteed bank deposits.

## Same amount of cash, same individuals, similar products: different rates.

Over the last decade or so banks have started offering radically different deposit rates to different types of depositors even though the deposit products are essentially the same such as 'at call'. This has even crept into rates for term deposits.

For example ANZ offer:

- To individuals,
  - <https://www.anz.com.au/personal/bank-accounts/>
    - Earn 4.25% p.a. on your ANZ Save balance if you have under \$250,000.
- To SMSFs with same individuals as trustees:
  - <https://www.anz.com.au/personal/bank-accounts/savings-accounts/smsf-cash-hub-account/>
    - \$10,000+ 1.80% p.a.
- to SMSFs with same individuals as trustees:
  - <https://www.anz.com.au/personal/bank-accounts/term-deposits/>
    - 3.45% p.a. 6 months Investments of \$5,000 to \$99,999 Interest paid at maturity
- to SMSFs with same individuals as directors of company as trustees:
  - <https://www.anz.com.au/business/accounts/savings-accounts/business-term-deposit/>
    - 2.55% p.a. 6 months Investments of \$5,000 to \$99,999. Interest paid at maturity.
- to companies with same individuals as directors:
  - <https://www.anz.com.au/business/accounts/savings-accounts/>
    - Interest rate (\$5,000 and over) 1.20% p.a.

Great Southern Bank is less afflicted by offering Advance Saver to individuals, SMSFs and companies: <https://www.greatsouthernbank.com.au/bank-and-save/savings-accounts/advantage-saver>

However their deposit rates for other savings products do differ to a minor extent: <https://www.greatsouthernbank.com.au/bank-and-save/savings-accounts>

All banks (ADIs) are similarly afflicted to greater or lesser degree according to our experience of having accounts at over 35 banks / ADIs during the last 50 years.

As one \$1 deposit is exactly the same as another \$1 deposit, the different account names and rates are largely about target marketing, not rate-for-term based competition.

## **Massively redundant account application processes for non-individual depositors.**

We have become adept at applying for bank accounts. Even so, the same details on different application forms, same certified copies etc, time and again, are a strong deterrent to applying for accounts.

The banks appear not want one industry wide form, or even set of forms, for all types of applicants, individuals, joint individuals, SMSF individual trustees, SMSF company trustee, company, trust, ...

**Financial Services Council identification forms** could be adapted to an industry wide standard and made digital:  
<https://www.mlc.com.au/investing-with-us/financial-services-council-identification-forms>

**Fill once use many times.**

Banks have made progress in making applications for individuals easy thereby allowing depositors to easily avail of offers of larger interest rate-for-term accounts.

**Decreasing account opening, and transactional, 'friction' increases competition.**

Kind regards,  
Dudley Mills,

[Redacted signature block]

[Redacted contact information]

[REDACTED]

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**From:** Dudley John Mills [REDACTED]  
**Sent:** Tuesday, 16 May 2023 1:05 PM  
**To:** Financial Services Competition  
**Subject:** RE: Different rates for personal, SMSFs, companies; redundant application processes.

[REDACTED]

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This is an update to my earlier submission below.

<https://www.cdr.gov.au/> framework provides for submission to a service provider of identity documents and account opening request documents and the updating of those documents:

[Government Response to the Inquiry into Future Directions for the Consumer Data Right](#)

Page 17:

**Part 2: Action initiation in the banking sector**

**5.18 – General action initiation in the banking sector**

General action initiation in the banking sector should enable product applications, updating details, managing products, closing a product, ending a customer relationship, and other associated general actions. These include general actions that support payments referred to in Recommendation 5.4.

Certain information should be explicitly excluded from being subject to change through Consumer Data Right action initiation due to concerns for consumers' privacy and safety. These classes of information should be identified through regulatory and privacy impact assessments, and through consultation with industry and consumer groups.

**5.19 – Prioritising product applications to support switching**

To support the streamlining of switching, product applications and establishing new customer relationships should be prioritised in the phased implementation of general action initiation in the banking sector. The Consumer Data Right rule maker should determine the order of prioritisation of general action initiation in consultation with consumer groups, the banking sector, accredited persons and other stakeholders.

The initiation data must come from someone.

For identification documentation and account opening requests that should be the beneficial owner or their agent. **An individual, trustee or director should be able to submit documents directly to ADIs with commonly available computer applications.**

PDF files allowing the user to digitally fill data fields from which the data can be programmatically extracted, verified and used to automatically update computer systems is one such computer application readily available and widely understood by the general public.

The Financial Services Council identification forms already exist, supply the required functionality and largely merely need to be adopted as an industry wide standard: <https://www.mlcam.com.au/investing-with-us/financial-services-council-identification-forms>

**Fill once, submit to one or multiple ADIs.**

Dudley.

[REDACTED]