

Submission by Auswide Bank-23 May 2023

Auswide Bank supports the centralisation of an Aggregator Assurance program that adopts best practise and provides an industry standard approach. However, as a smaller ADI access to the AAP may be cost prohibitive and therefore create an unfair and potentially anti- competitive position. Without the specific details about the lender participation and the commercial costs being contained in the Aggregator Assurance Plan and budget it is difficult to ascertain if it were a program that would deliver the proposed benefits stipulated in the submission particularly to those smaller lenders, who do not currently engage a large number of dedicated resources to compliance and management of Aggregators and broker introduced lending. We also note that the Aggregators will be invited to participate in the program and under 6.2 (f) participation will be voluntary. As set out in clause 2.11 of particular interest to Auswide as a smaller lender are the items (e) Responsible Lending/ Regulatory management; (g) IT and System Access Controls; (h) Data Security and Privacy (i) Outsourcing and Third Parties, which generally have significant costs attached to this type of monitoring and reporting.