

# Banking Code Compliance Committee

## 2021–22 Business Plan

The Banking Code Compliance Committee (BCCC) is an independent monitoring body established under clause 207 of the Banking Code of Practice (Code). The BCCC's 2021–24 Strategic Plan sets out its overall objectives to fulfil its purpose to monitor and drive best practice Code compliance.

The BCCC's 2021–22 Business Plan sets out the priority areas and activities it will undertake to meet the objectives in the Strategic Plan.

The BCCC takes a risk-based approach to monitoring banks' compliance with the Code and aims to operate in an agile manner so that the highest priority work is always completed first. As such, the priority areas and activities listed in the Business Plan represent the likely tasks that will be completed by the BCCC, but these may be subject to change. The Business Plan will be regularly reviewed and revised where necessary, to ensure that the BCCC is focusing on the most important issues.

### Monitoring activities


The BCCC has published Operating Procedures which provide guidance about how the BCCC conducts its monitoring activities. The activities are determined with reference to its Code Monitoring Priority Framework.

The nature, number and scope of the monitoring activities conducted will have regard to the priorities identified and level of concern about individual matters under examination. The BCCC is likely to conduct up to two major inquiries and ten targeted inquiries or investigations at any given time.

### Priority areas

The following represent the priority areas that the BCCC will likely focus on in 2021–22:


- Challenges caused by the COVID-19 pandemic, including financial difficulty
- Customers experiencing vulnerability
- Small business and farming customers
- Banks' organisational capability to comply with the Code
- Deceased estates
- Banks' communications with customers and provision of information


Focus area	Activities	2021–22				Outcomes
		Q1	Q2	Q3	Q4	
 <p><b>Monitor banks' compliance with the Code</b></p>	1. Conduct the Banking Code Compliance Statement program					<p>Banks' compliance during the reporting period has been assessed and reported publicly</p> <p>Individual banks have been provided with a Code compliance benchmark report</p> <p>Intelligence obtained for the BCCC's Code Monitoring Priority Framework</p>
	2. Assess self-reported breaches, and work with banks to identify appropriate corrective actions where required					<p>Intelligence obtained for the BCCC's Code Monitoring Priority Framework</p> <p>Instances of non-compliance have been adequately addressed</p>
	3. Review Code breach allegations made by customers and advocates and referrals from other stakeholders to inform the Priority Framework					<p>Potential instances of serious and/or systemic non-compliance identified</p> <p>Intelligence obtained for the BCCC's Code Monitoring Priority Framework</p>
	4. At the BCCC's discretion, investigate Code breach allegations and referrals					<p>Instances of non-compliance have been adequately addressed</p> <p>Appropriate remediation completed</p> <p>Findings published</p> <p>Sanctions applied for instances of systemic and serious non-compliance</p>
	5. Ongoing assessment of compliance risks and priorities through Code Monitoring Priority Framework					<p>Identified priority areas and conducted appropriate monitoring activities where required</p>
	6. Conduct targeted inquiry into deceased estates					<p>Instances of serious and/or systemic non-compliance identified</p> <p>Appropriate remediation completed</p> <p>Sanctions applied (where applicable)</p> <p>Publicly reported on banks' compliance</p> <p>Guidance for improved practice published</p>

Focus area	Activities	2021–22				Outcomes
		Q1	Q2	Q3	Q4	
	7. Conduct targeted/follow up inquiries into financial difficulty					Instances of serious and/or systemic non-compliance identified Appropriate remediation completed Sanctions applied (where applicable) Publicly reported on banks' compliance Guidance for improved practice published
	8. Undertake follow up inquiries regarding the BCCC's 2021 Guarantees Inquiry Report					Reports on banks' actions to improve compliance performance have been published
	9. Undertake follow up inquiries regarding the BCCC's 2021 Building Organisational Capability Report					Reports on banks' actions to improve compliance performance have been published
	10. Undertake follow up inquiries regarding the BCCC's 2021 Inquiry into Part 4 of the Code Report					Reports on banks' actions to improve compliance performance have been published
	11. Conduct any other major or targeted inquiries as required.					Instances of serious and/or systemic non-compliance identified Appropriate remediation completed Sanctions applied (where applicable) Publicly reported on banks' compliance Guidance for improved practice published



**Monitor banks' compliance with the Code**

Focus area	Activities	2021–22				Outcomes
		Q1	Q2	Q3	Q4	
 <p><b>Stakeholder engagement and communications</b></p>	12. Develop and implement a stakeholder engagement and communications plan					Increased awareness of the Code and the BCCC’s work Insights obtained for the BCCC’s Code Monitoring Priority Framework
	13. Publish updates about the BCCC’s work on its website and social media (where applicable)					Outcomes of BCCC monitoring activities published Guidance for improved practice published Increased awareness of the Code and the BCCC’s work
	14. Hold a BCCC Forum					Updates shared about the BCCC’s activities and publications Good practice initiatives shared Compliance issues identified
	15. Engage with key consumer stakeholders through: <ul style="list-style-type: none"> <li>Regular meetings with representatives of consumer organisations</li> <li>Attendance at consumer conferences and forums</li> <li>Consultation when scoping monitoring activities and developing guidance</li> </ul>					Insights obtained for the BCCC’s Code Monitoring Priority Framework Outcomes of BCCC monitoring activities communicated Increased awareness of Code obligations and the BCCC
	16. Engage with key industry stakeholders through: <ul style="list-style-type: none"> <li>Regular meetings with the ABA</li> <li>Meetings with the ABA Council</li> <li>Regular meetings with banks</li> <li>Liaison with banks through periodic workshops</li> </ul>					Increased awareness of Code obligations and the BCCC Insights obtained for the BCCC’s Code Monitoring Priority Framework Improvements to banks’ practices
	17. Engage with small business and farming stakeholders, including regular meetings with the BCCC’s Small Business and Agribusiness Advisory Panel					Insights obtained for the BCCC’s Code Monitoring Priority Framework Outcomes of BCCC monitoring activities communicated Increased awareness of Code obligations and the BCCC
	18. Regularly engage with other key stakeholders, including the Australian Financial Complaints Authority (AFCA) and the Australian Securities and Investments Commission (ASIC).					Insights obtained for the BCCC’s Code Monitoring Priority Framework Outcomes of BCCC monitoring activities communicated Increased awareness of Code obligations and the BCCC

Focus area	Activities	2021–22				Outcomes
		Q1	Q2	Q3	Q4	
 <p><b>BCCC Governance and Operations</b></p>	19. Review the data requirements in the Banking Code Compliance Statement					A revised Banking Code Compliance Statement program that is effective and efficient
	20. Publish an Annual Report of the BCCC's 2020–21 activities					Outcomes of BCCC monitoring activities published Increased awareness of the BCCC
	21. Arrange a review of the BCCC's activities, coinciding with the periodic review of the Code by the ABA					Areas for improvements in the BCCC's governance and operations identified
	22. Review the BCCC's Strategic Plan and develop the 2022-23 Business Plan and budget					Increased awareness of the BCCC's priority areas and planned activities BCCC has sufficient resources and funding to carry out its functions
	23. Make submissions to industry consultations (where appropriate) and the review of the Code					Insights provided assist with the development of industry standards and guidance for banks and customers Increased awareness of the Code and the BCCC
	24. Review and amend where necessary the BCCC's operating procedures to ensure they remain fit for purpose					Increased efficiency and effectiveness of BCCC operations
	25. Review and enhance the data capabilities of the BCCC					Efficient and effective use of data to obtain insights for the BCCC's Code Monitoring Priority Framework