

26 November, 2015

The Committee Secretariat
Senate Standing Committees on Economics
PO Box 6100
Parliament House
Canberra ACT 2600

via email: economics.sen@aph.gov.au

Dear Committee Secretary

Question on Notice: Senate Economic References Committee Inquiry into Cooperative, mutual and member owned firms

I am writing to provide a response to a Question which COBA took on notice at the Committee's hearing in Sydney on Thursday, 29 October 2015.

The question appears on page 51 of the draft Hansard and relates to a discussion about APRA's Guidelines on section 66 of the Banking Act, prohibiting credit unions and building societies using the term "banking" in a registered trading name or internet domain name.

The Acting Chair asked if APRA had provided any documentation to Summerland Credit Union, regarding the use of Summerland's domain name: www.bankingonfootball.com. An excerpt is provided below:

Ms MacKenzie: One of our members on the Mid North Coast, Summerland Credit Union, have a very successful local program called Banking on Football, and they have a nice little product that they run with, and it is very much a community-minded initiative. They have registered the domain name bankingonfootball. Because of APRA's changes to the section 66 guidelines, there is now a question about whether or not they are allowed to do that.

Mr Degotardi: It is a community program that supports local sporting clubs.

ACTING CHAIR: Is there any documentation from APRA suggesting it is an issue? Have they contacted Summerland?

Mr Degotardi: They have been in contact with Summerland. As to whether there is written documentation, I would have to take that on notice if that is a question.

ACTING CHAIR: Could you take that on notice, and if there is can we have a look at that.

Mr Degotardi: I might add that often communications between regulated institutions are confidential to those institutions.

ACTING CHAIR: Of course.

COBA understands that APRA indicated to Summerland that the bankingonfootball.com URL was not permitted under the Guidelines. This advice was not provided in writing.

As a result of this advice, Summerland launched a new website: bof.com.au, at significant impact to the brand and an unnecessary drain on resources. The name Banking on Football was registered in 2011 and the website has been running since 9 October 2012.

The bankingonfootball.com URL will continue to operate in parallel with bof.com.au until APRA formally announces its final position on the issue.

APRA has indicated that it potentially has some other concerns with the "banking on football" name/branding, but it has not elaborated on what these concerns are. APRA has indicated that it may write to Summerland to outline these concerns.

Yours sincerely

Luke Lawler
Head of Public Affairs