

# *Home Ownership and Indigenous Australians*

*Discussion paper*

July 2007

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## *Executive summary*

The objective of this paper is to provide a framework for discussion between ANZ and interested stakeholders about what we may do to assist in improving the level of home ownership by Indigenous Australians.

ANZ assists Australians to achieve home ownership every day. Australia has one of the most advanced banking markets in the world. Consumers have a wide range of product options when buying a home. The market for mortgage loans is highly competitive, with the last ten years characterised by significant price competition and product improvements. In Australia, 71 per cent of the population live in a home that is owned by themselves or a family member. This level is marginally above other developed economies including the United States (70 per cent), Canada (67 per cent) and New Zealand (65 per cent).

But, in Australia, home ownership by Indigenous people is low – just 28 per cent (ABS, 2002). This is also low compared with home ownership by Indigenous peoples in the United States (59 per cent), Canada (41 per cent) and New Zealand (50 per cent). ANZ research has identified that Indigenous Australians are the predominant group of people consistently associated with financial exclusion (Chant Link, 2004). Specifically, this financial exclusion is represented by: poor access to fair, safe and appropriate financial products and services; low understanding of financial matters, and; greater likelihood of experiencing financial difficulty.

When members of our society are excluded from accessing appropriate financial services – as a result of a combination of social, economic, behavioural and structural factors – it would seem likely that the market is under-served and individual aspirations not met. There also exists a strong relationship between financial exclusion and other elements of social exclusion, including health, education, employment and broader economic exclusion (Chant Link, 2004).

At the same time, Indigenous Australians have repeatedly identified home ownership as a goal. However, this goal may be considered unattainable due to a variety of factors, including: relatively low household incomes; high cost of housing relative to income; low consumer confidence in approaching financial institutions; (perceived and real) inability to save minimum deposit for home loan; overconservative bank credit model assumptions; inappropriate and limited availability of housing stock, and; limited access to mortgage advisors and brokers due to perceived market complexity.

ANZ is a “mainstream” financial services provider. We seek to understand and serve our customers, and we have been recognised for our efforts through increased customer satisfaction, market share and third-party recognition. We are less familiar, less able and less confident in understanding and meeting the needs of Indigenous customers. Mutual misunderstandings, preconceptions of customer needs, poor communication involving jargon and cultural unfamiliarity all play a part. In the short term, efforts to achieve behavioural change on ANZ’s part – as we have successfully

done in other aspects of our business and here illustrated in minicase studies – may be the most useful contribution to help lift Indigenous financial inclusion and, in turn, home ownership rates.

A wide variety of programs have been developed in other countries to promote Indigenous home ownership, sometimes with good results. However, it was generally observed that: schemes had not achieved sufficient scale, implying possible tokenism or uneconomic modelling; collaboration between government, business and the community sector was not optimal and; financial sustainability was rarely considered as an objective, with most schemes now discontinued. Some schemes have been successful, particularly where the principles of commercial viability and participative consultative design have been applied.

Consumer choice and control in the manner in which a house is acquired are critical in realising the social benefits associated with home ownership. Potential homeowners want to select and then buy their own house, rather than have it given to them and being allowed to progressively own it. Some research has found that the key to simultaneously achieving social benefit and home ownership is to provide maximum engagement, choice and decision-making power to the potential owner (Lilley, 2004). Protection and preservation of the asset is optimised when the owner controls the purchase decision.

The lower levels of home ownership by Indigenous people are evident across Australia in urban and regional centres, as well as rural, remote and very remote locations. However, the factors leading to low ownership rates vary by location type. In remote and very remote locations, issues including housing affordability, availability of maintenance and community infrastructure and land tenure are problematic when attempting to acquire a home and protect and optimise its value (SCRGSP, 2007). It is likely that in the near term, ANZ could most usefully focus on Indigenous home ownership in urban and regional centres. In the medium to long term, financial service providers should continue to work with communities, government and other stakeholders to better understand and address the more significant barriers to home ownership in remote and very remote communities.

### **Next steps**

All interested parties are invited to provide commentary on the issues and ideas presented in this discussion paper. Comments are invited by 30 September 2007 and should be emailed to [adam.mooney@anz.com](mailto:adam.mooney@anz.com) or alternatively forwarded to:

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ANZ will be conducting stakeholder consultations on issues raised in this paper. If you wish to contribute to those consultations please contact us on the telephone number provided above. This consultation will include workshops in August and September 2007 in several locations. At the end of the consultation period, ANZ undertakes to summarise the feedback. This feedback will be published, along with ANZ's response, in the last quarter of 2007.

This discussion paper and consultation process represents an action committed to in ANZ's Reconciliation Action Plan, released in April 2007. Further details are available at [www.anz.com/aus/values/community/Reconciliation.asp](http://www.anz.com/aus/values/community/Reconciliation.asp)

## *Introduction*

Borrowing funds to purchase a home is regarded as the most significant financial commitment most people make in their lifetime. Most people that borrow to buy a house progressively obtain a sense of economic wellbeing as loan repayments are met, principal outstanding is reduced and assets (home equity) are built. Research shows that this feeling of economic wellbeing contributes strongly to social wellbeing and leads to greater inclusiveness, dignity, empowerment and confidence about the future (Shew & Stelzer, 2004).

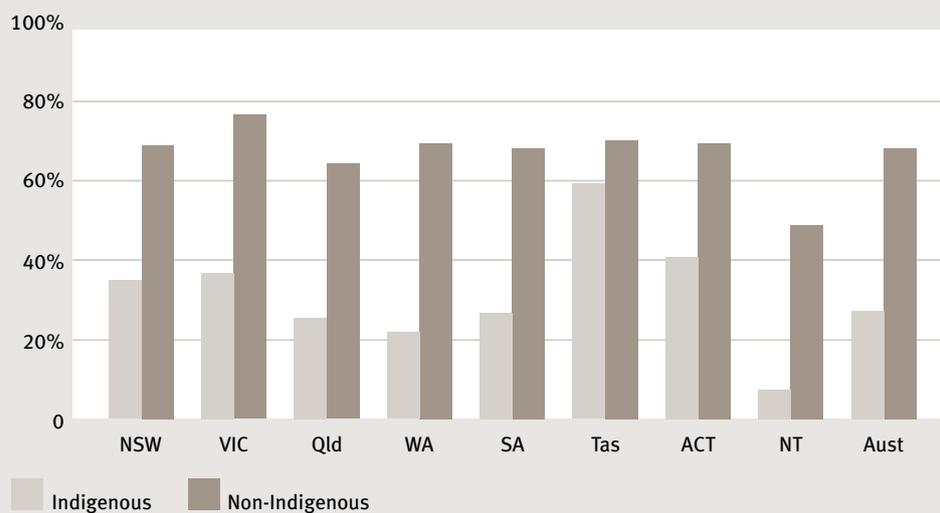
Home ownership participation in Australia is positively correlated with improvements in health, child education, poverty, crime and social inclusion (Mullins, Western, Broadbent, 2001). It is important to acknowledge however, that researchers have been unable to differentiate the cause and effect relationship between home ownership and these factors. For example, home ownership is seen as both a cause and a consequence of poverty alleviation and health improvements.

In 2004, United States-based financial services provider Fannie Mae commissioned research into community benefits arising from home ownership (Shew and Stelzer, 2004). This study reported that people have a greater propensity for local action - to make investments of time and other resources within their communities - where home ownership participation rates are high. Increased geographical stability and the expectation of long-term benefits from local community investment, such as health, education and security infrastructure, is considered the main driver of this. In addition, homeowners are more likely to participate in local community organisations, work together to solve local problems and see their children stay at school for longer.

## Indigenous home ownership and financial inclusion

In November 2004 ANZ released research into financial exclusion in Australia. This research identified that Indigenous Australians were the predominant group of people consistently associated with financial exclusion (Chant Link, 2004). Although 71 per cent of all Australians have some degree of home ownership, Indigenous participation in home ownership is 28 per cent (ABS, 2002 table below).

People aged 18 years and over living in homes someone in their household owned or was purchasing, 2002



Source: ABS 2002 NATSISS (unpublished); ABS 2002 GSS (unpublished); table 3A.7.2.  
Source: SCRGSP 2005

Specific research into Australian Indigenous home ownership using 1994 National Aboriginal and Torres Strait Islander Survey data also revealed positive associations with mainstream employment and negative associations with social dysfunction including family violence and other crime. This paper, prepared by Adhikari and Yik (1997), also recommended an extension of existing self-funded home ownership programs (seed funded by government).

However, some of the home ownership schemes were criticised for providing limited choice of housing stock or applying inappropriate construction techniques. These factors may lead to owner dissatisfaction and preclude people from participating in the usual social benefits associated with home ownership (Adhikari and Yik, 1997). This applies to both existing housing as well as housing under construction.

Consumer choice and control in the manner in which a house is acquired are critical in realising the social benefits associated with home ownership. Potential homeowners want to select and then buy their own house, rather than have it given to them and being allowed to progressively own it. Some research has found that the key to simultaneously achieving social benefit and home ownership is to provide maximum engagement, choice and decision-making power to the potential owner (Lilley, 2004). Protection and preservation of the asset is optimised when the owner controls the purchase decision.

## International experience

Indigenous Australians have low home ownership rates relative to non-Indigenous Australians, and significantly lower home ownership rates when compared with other Indigenous peoples in developed countries (Table 1).

**Table 1: Home ownership by Indigenous people from selected countries**

Country	Home ownership %	
	Indigenous	Total
Australia	28 <sup>2</sup>	71 <sup>2</sup>
Canada	41 <sup>3</sup>	67 <sup>5</sup>
New Zealand	50 <sup>1</sup>	65 <sup>6</sup>
United States	59 <sup>3</sup>	70 <sup>4</sup>

Source: 1. Kauffman, 2003; 2. ABS 2002, NATSISS, ABS 2002, GSS 3. Australian Indigenous Healthinfonet, 2000, 4. Real Estate News Network 2006, 5. Scotia Bank, 2006, 6. New Zealand Government, 2006

In Canada, United States and New Zealand programs have been developed to encourage and promote Indigenous home ownership, to achieve some of the social benefits noted above.

Canada, in particular, has experienced success from programs specifically designed to promote home ownership. While not designed specifically for Indigenous people, the Registered Home Ownership Savings Plan (RHOSP) program led to a 20 per cent increase in the rate of conversion from renting to owning a house, within the target group (Engelhardt, 1997).

The RHOSP program was introduced in Canada in 1974. It allowed for a tax rebate of up to C\$1,000 on savings committed to the purchase of a first home. This scheme promoted savings behaviour by making the benefit availability contingent upon realised individual savings. In addition, it contributed to increased dignity, empowerment and confidence amongst participants due to the mandatory individual savings requirement. The concept of self-help resulted in increased participant pride, respect and sense of control, leading to longer ownership tenure and better loan repayment performance (Engelhardt, 1997).

Other programs that have been successful in increasing home ownership for Indigenous and disadvantaged people include:

- Interest free loan schemes (France, USA)
- Dedicated mortgage managers (brokers) for target group to guide and direct applications to lenders (USA, New Zealand, Australia)

- Rebates for real estate transaction costs including commission and other transfer charges (UK)
- First home buyer's grant (Australia)
- Extended mortgage protection insurance (Australia)
- Shared equity ownership schemes – bank and customer share property value appreciation (UK, Western Australia)
- Home savings account – Savings account with embedded option of home loan after fixed period (France, Germany)
- Lease to purchase programs – previous lease payments reclassified as mortgage repayments (USA)
- Mortgage Revenue Bonds – low interest loans offered by government (USA)
- Homebuyer counselling – education and introduction of homebuyers to responsible lenders (USA)

Each of these programs have contributed to increased home ownership rates. However, overall criticism recognises that:

- Schemes have not achieved sufficient scale and were not widely promoted – implying possible tokenism or restricted resourcing and commitment
- Collaboration between government, business and the community may not have been optimal – effort to align objectives could have been seen as too great an obstacle
- Financial and societal sustainability was rarely considered as a program objective and therefore many of these schemes have been discontinued

#### Questions for discussion:

- What other overseas programs exist aimed at increasing the level of home ownership among Indigenous and other financially excluded communities?
- What are the key indicators of a program's success?
- To what extent have the programs listed above and other programs aimed at increasing the level of home ownership among Indigenous and other financially excluded communities been successful / unsuccessful?
- What are the key features of the program, which may have contributed to its success / failure?

## *Case study 1: The Progress Loan - Changing our business practices to assist people on low incomes*

*ANZ has had some recent experience in identifying and responding to structural and behavioural issues associated with financial inclusion. This case study is provided in order to stimulate discussion on possible changes necessary to increase Indigenous home ownership.*

In mid-2006, ANZ and the Brotherhood of St Laurence teamed up to develop a small loans program for people on low incomes. This was in response to earlier research into financial exclusion (Chant Link, 2004) which identified a need for affordable, safe and fair small value credit to be made available to people on low incomes.

The small loans market in Australia, over the last decade, has been characterised by increased product complexity, increasing use of technology (for example online applications), automated customer credit assessment and less face to face opportunity to discuss financing options. As a result, some people on low incomes seeking small loans have been declined by mainstream lenders, targeted by predatory exploitative fringe lenders or, in many cases, gone without (Chant Link, 2004).

The program was piloted in Victoria in two locations, Fitzroy and Frankston, with the objectives of better linking people on low incomes with relevant financial services, testing the sustainability of the program and developing a model that suited customers and also replicable by other community organisations. The program offers people on low incomes access to loans of between \$500 and \$3,000 to pay for household goods and services, self-improvement, medical and car expenses.

During the pilot, 140 people on low incomes benefited from the Progress Loan in Victoria. The majority of loans were provided to women, with an average loan size of \$1,549 and at the time of writing, all borrowers were up to date with their repayments.

The Progress Loan's customers have been able to improve their standard of living by purchasing important items such as beds for their children or essential whitegoods. Many customers would not have ordinarily approached a bank and had a limited range of alternatives.

ANZ's Managing Director Consumer Finance, Jenny Fagg, said "Working together with the Brotherhood on this shows the benefits of a partnership approach. With the Brotherhood's guidance we have amended our credit assessment processes to better reflect income and spending patterns of people on low incomes. We have also learned a great deal about this segment in regards to product design and customer interactions."

"Also, our Victorian pilot results show that the 140 loans written are performing better than our overall portfolio, in terms of credit quality and arrears, which has pleasantly surprised some people. We are working together to increase the number of loans officers in Victoria and also planning to extend this to other states."

## Australian context

The low rate of Indigenous home ownership in Australia (28 per cent) has been identified as a key indicator of the economic and social exclusion of Indigenous people (SCRGSP, 2007). In recent budgets, the Federal Government has expanded two programs to respond to this issue.

The IBA Homes program, which provides access to finance to Indigenous people who are primarily unable to obtain finance from banks, was expanded in the May 2006 Federal budget by \$21 million, allowing an additional 140 families to obtain loans to purchase homes. This program was introduced as a gap product to specifically promote home ownership to Indigenous people. The loan portfolio was valued at \$415 million as at April 2007 and had 3,500 customers. However, there is a waiting list of up to nine months for potential customers due to the lack of available capital to meet demand. Overall loan performance is good with only 0.05% of the portfolio in arrears as at April 2007 (Indigenous Business Australia, unpublished).

The Home Ownership on Indigenous Land Program promotes ownership on Indigenous land and provides advice and guidance in this complex area. An additional \$107 million in funding was provided in the May 2006 budget to this program to allow an additional 460 homes to be purchased or built.

### Questions for discussion:

What other programs exist in Australia aimed at improving home ownership among Indigenous and other financially excluded communities?

What has worked and why?

### Market size

Of the 460,000 Indigenous Australians, 129,000 (28 per cent) live in a house that is owned or financed in their name or a family member's name. This means that 331,000 Indigenous Australians are either renting, occupying public housing or have some other housing arrangement.

Indigenous Australians are broadly considered the most socially and financially excluded members of Australian society. Notwithstanding that Australia is a developed market economy, some Indigenous communities have been described as having features typical of developing countries, for example, lower life expectancy at birth, lower school retention rates, lower levels of household and individual income and economic participation and greater health concerns (SCRGSP 2003).

### Current impediments

Specific factors that need to be addressed if Indigenous home ownership rates are to increase include:

- The high cost of housing relative to income – particularly in remote areas where construction costs are very high (loan serviceability very difficult)
- The lack of confidence by customers to approach financial institutions due to past experience or perceptions of a negative outcome
- People unable or unwilling to save minimum deposit normally required by financial institutions
- Automatic credit scoring models contains assumptions which in effect exclude some Indigenous people – assumptions on income and expenditure levels do not necessarily recognise individual budgets and spending patterns
- Limited or unsuitable housing supply offered through government programs, contributing to low care and maintenance and ultimately high housing turnover (including loan default)
- Advisors and brokers unfamiliar with existing home ownership programs - due to frequent changes to programs, complex eligibility criteria and lack of long term commitment, many advisors have not invested the time to understand and promote the programs

#### Questions for discussion:

- What other factors are limiting Indigenous home ownership?
- To what extent are the factors listed above primary drivers or secondary drivers?
- What role can financial institutions, community organisations and governments play in developing solutions and delivering programs?
- What are the specific geographic issues that would need to be addressed and how could a program be tailored to address these issues?
- To what extent will the concepts of commercial viability and participative consultative design need to be considered to ensure a program is successful?
- Under what circumstances would native title issues need to be considered?

## *Case study 2: Esanda loans in remote communities - Improved credit assessment*

*ANZ has had some recent experience in identifying and responding to structural and behavioural issues associated with financial inclusion. This case study is provided in order to stimulate discussion on possible changes necessary to increase Indigenous home ownership.*

For some time, there have been concerns as to how financiers should best serve customers in remote locations to provide the same proposition to that of the general Australian customer base. There have been a number of factors to consider including: credit assessment policies being less relevant for remote locations; a general lack of understanding of the customer; greater variability in customer income, and; more complex and expensive loan collection and recovery processes involving extensive travel.

Esanda Finance Corporation, an ANZ business, has been one of the financial service providers doing business in remote communities for many years, either through the ANZ branch network, directly and through introducers (including motor vehicle dealerships and brokers).

In response to increasing credit losses from customers in some remote locations, Esanda, in 2005, working together with Indigenous communities, Northern Territory Consumer Affairs and other stakeholders, developed a new specialised policy for the credit assessment of remote customer loan applications. This new remote lending policy defined regions of New South Wales, South Australia, Northern Territory, Western Australian and Queensland by reference to postcodes. Customers applying for credit from these locations would be subject to more relevant credit assessment processes.

These processes included: the recognition of income from the Community Development and Employment Projects (CDEP) scheme; ability for credit assessors to consider applications from customers with no credit record; the ability to include employment from a variety of sources; specific consideration of affordability and serviceability based on local income and expenditure patterns; better matching of loan terms with the expected useful life of the asset purchased for that locality (including relevant valuations), and; specific guidance on establishing simple and convenient loan repayment mechanisms.

Since applying this new credit assessment policy, lending has continued to remote Australia but the level of losses has reduced, which is good for Esanda and for its customers. An added benefit has been a more transparent lending process and one that is recognised as relevant and appropriate for remote regions of Australia.

## *Structural and behavioural barriers*

Indigenous Australians have repeatedly identified home ownership as a goal considered unattainable due to a variety of factors, including: relatively low household incomes; high cost of housing relative to income; low consumer confidence in approaching financial institutions; (perceived and real) inability to save minimum deposit for home loan; bank credit model assumptions too conservative; inappropriate and limited availability of housing stock; and limited access to mortgage advisors and brokers due to perceived market complexity.

In addition, there are some behavioural barriers. Mortgage providers are less able and less confident in understanding and meeting the needs of Indigenous customers, compared with non-Indigenous customers. This is supported by research and focus group feedback which highlights that lower levels of financial inclusion by Indigenous people is also the result of past unsatisfactory interactions with financial service providers. Specifically, misunderstandings, preconception of customer needs, poor communication involving over-technical jargon and reduced willingness to serve and prioritise customers due to cultural unfamiliarity all play a part.

These behavioural aspects have been widely acknowledged as a fundamental factor contributing not only to low home ownership by Indigenous people, but also lower overall financial inclusion. There are several ways that financial service providers may address these behavioural barriers. Increasing workforce representation through a greater number of Indigenous employees will help to make the employee base better representative of the community and customer base, increasing capacity to welcome and understand Indigenous customers. Cultural awareness training and coaching for relevant customer facing and support staff, can increase capacity to 'know your customer' and therefore better meet their needs.

Product design is another area for review in order to better serve and meet the needs of Indigenous customers. Typical mortgage loans are usually provided to either individuals or up to two joint applicants. However, some Indigenous families seek to jointly take out mortgage loans involving up to four people, reflecting greater demand for common ownership, relative to non-Indigenous people. Although this type of group (family) lending is unfamiliar to banks operating in developed economies, this concept has been successful in developing economies through microfinance.

Families and other groups that already embrace a relatively stronger sense of sharing and obligation have found that collective responsibility for home loan repayment better suits their needs in several ways. Firstly, loan repayments become more affordable when shared by say four family members. Secondly, in communities that experience more frequent periods of unemployment and absence from work through illness, income streams are more volatile and less certain. It gives the family greater comfort, knowing that if one or two of four loan repayers experience temporary income shortages, that the other two or three family members will meet repayment obligations (Microfinance Network and Shorebank Advisory Services Inc., 2000).

Banks however, may currently see this extension of joint liability, involving set up and loan application assessment for multiple customers, as an added cost and increased risk. Over the life of the loan however, this additional establishment cost is potentially offset by lower credit loss rates as customers are better able to service the loan (Morduch, 2000). Indigenous Business Australia, through its IBA Homes program, provides this flexibility and customers have expressed strong satisfaction with this particular product feature (Indigenous Business Australia, 2007, unpublished).

## Case study 3: From trainee to mentor – Improved people practices

*ANZ has had some recent experience in identifying and responding to structural and behavioural issues associated with financial inclusion. This case study is provided in order to stimulate discussion on possible changes necessary to increase Indigenous home ownership.*

During consultations to develop ANZ's Reconciliation Action Plan, several stakeholders commented that banks are less effective in understanding and meeting the needs of Indigenous customers, relative to most customers.

In 2003, ANZ began recruiting Indigenous trainees in partnership with the Aboriginal Employment Strategy (AES). Initially established to provide employment as an end in itself, this program has seen our staff base become more representative of the communities they live in and serve. This has lifted our capacity to welcome, understand and meet the needs of Indigenous customers.

However, recruiting and training staff is only part of the process. Creating the right environment and support network for the trainees is also critical in ensuring that staff are satisfied, engaged and feel valued and will develop within the organisation. This wasn't always the case and has required behavioural change in the way we recruit and retain valued employees. Working alongside a trusted advisor in the AES has been key.

Bruce McQualter, Head of Indigenous Employment and Training at ANZ, commented that "The AES have shown us that getting support and encouragement from the trainee's family and school are very important. Spending time with the trainee's colleagues in the branch to step through the objectives of the trainee program also improves understanding and helps to create an inclusive and more accepting environment. Without this we would lose very capable people in the early stages of their work life."

This program has enabled the development of relationships, informal mutual coaching, and conversations amongst branch staff about customer needs, appropriate products and services, as well as cultural awareness and understanding. By having a staff base more representative of the communities we serve, we believe that we will be better able to understand and meet the needs of all customer groups.

Zabowie Mills, 19, is part of ANZ's trainee program and started the program in 2004. In addition to securing a full time job at ANZ, Zabowie has also become a mentor and role model for other Indigenous trainees in her community.

"The traineeship is not just about sitting down and learning things – it's actual hands on work and I have learned so much. I enjoy sharing this with others, which gives me a greater sense of value and meaning in what I am doing." said Zabowie.

ANZ has committed to lifting the proportion of employees from Indigenous backgrounds in our Regional and Rural business to 3 per cent by 2011.

## Options for consideration

1. **Promote savings programs** to Indigenous people saving for a home loan deposit. This might be linked to a mortgage loan program or product guaranteed to provide the loan when the deposit target is reached.

By promoting savings behaviour and providing an incentive through partial or full matching, participants may progressively gain confidence, improve understanding and accumulate savings. Throughout this process participants could learn more about the benefits, risks and practical steps needed to buy a house and obtain a mortgage loan.

2. **Develop partnerships under which community organisations would originate specifically designed home loans.** It may be appropriate for local community organisations to receive an upfront brokerage fee and ongoing commission and potentially extended to share credit losses within limits.

Local knowledge is essential in property lending. It is important to understand the range of housing available, local factors inhibiting and assisting home ownership, local infrastructure to support home maintenance, land ownership considerations, and local agencies and existing schemes. By sharing potential credit losses (within limits), local community organisations will ensure local knowledge is applied to encourage optimum loan performance and that funds are provided to customers that have the intention and capacity to repay the loan. Most third-party broking schemes operate in this way.

3. **Develop home owner's pathway program** comprising financial literacy, high interest saving product (not matched) with embedded mortgage loan option after 12, 24, or 36 months.

It is important to attract people wanting to buy a home, who are in stable financial circumstances with a desire and capacity to save. For these people, a program that progresses from financial literacy including home-lending, to saving behaviours, with a guaranteed home loan offer subject to specified simple criteria, may be appealing.

4. **Develop partnerships whereby existing Indigenous home ownership programs might be expanded** through ANZ's existing home mortgage expertise and branch network.

These options above are provided to stimulate ideas and promote further dialogue, rather than representing expected outcomes.

### QUESTIONS FOR DISCUSSION:

How could the above options improve Indigenous home ownership? What are their key advantages / disadvantages?

What other options are available?

## Case study 4: Customer Charter – Performance transparency

*ANZ has had some recent experience in identifying and responding to structural and behavioural issues associated with financial inclusion. This case study is provided in order to stimulate discussion on possible changes necessary to increase Indigenous home ownership.*

In 2001, ANZ publicly committed to a Customer Charter, containing service promises against which it holds itself accountable.

Through the Charter, ANZ commits to: convenient access; quick, friendly and reliable service; swift resolution of complaints; simple products; fast account opening; simple and clear communication; protecting privacy; making available financial literacy programs; and responsible lending.

Managing Director for ANZ's Personal Division, Brian Hartzler, said "When we first discussed the idea of a customer charter, people thought it was a public relations exercise. However, since then we've embedded these commitments into every part of our operations, through training programs, policies and procedures, performance management principles, product design and community connectedness."

"Our customer satisfaction levels, as monitored by an independent party, have overtaken all major banks in Australia. As at May 2007, 78 per cent of our customers were satisfied or very satisfied, compared with 71 per cent as the average of the other major banks. Our commitments to simple and clear communication, financial literacy and responsible lending in particular, have led to behavioural change within ANZ to help our people better understand all of our customers, including Indigenous customers. However, we still have room for improvement." Mr Hartzler said.

## *Feedback*

ANZ seeks to consult widely on the issues raised in this paper. As this paper has highlighted, there are many issues that may need to be addressed, some of which would be beyond the scope of this consultation.

ANZ invites comments on the issues raised until 30 September 2007. ANZ wishes to conduct in-depth discussions with interested parties and receive written responses to this paper. Comments should be emailed to [adam.mooney@anz.com](mailto:adam.mooney@anz.com) or alternatively forwarded to:

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