

ATTACHMENT B

Consumers' Association of Western Australia (Inc.)

The association identified what it considers as minor items in the Code of Practice, however, believe that they would assist in providing more precise information to the customer. These being:

Clause 6: Disclosure: Operation of Accounts

Subclauses 6.1 and 6.2 relate to a bank providing a customer (or prospective customer) with general prescriptive information in relation to banking services and cheque accounts. The CAWA has noted that the provision of such information is made after a request from the customer. The CAWA believes that the information should be made available as a matter of course at the time of enquiry, as a customer (or prospective customer), does not always have the background knowledge to make such a request.

Clause 12: Privacy and Confidentiality

Subclause 12.8 identifies that a request for customer information, or a request to correct information, be dealt with in a reasonable time. The CAWA believes that "reasonable" should be clarified as it is very open to interpretation and what is reasonable to the bank may not be reasonable to the customer.

Clause 19: Closure of Accounts

Subclause 19.1 item (iii) identifies that a bank may charge a customer an amount that is a reasonable estimate by the bank of the costs of closure of an account. Again, the CAWA believes that what is reasonable to the bank may not be reasonable to the customer and a set scale or percentage fee should apply that is made known at the time of opening the account.