

Public disclosure of Prudential Information

as at 31st December 2009

This public disclosure is prepared for Teachers Credit Union Limited for the quarter ended the 31st December 2009. It complies with Prudential Standard APS 330 Capital Adequacy: Public Disclosure of Prudential Information and is unaudited.

Capital management

Capital levels are managed to ensure compliance with Australian Prudential Regulation Authority (APRA) requirements. Those requirements encompass a framework of three pillars.

Pillar 1 - Minimum capital requirements, including a specific capital charge for operational risk.

Pillar 2 - Enhanced supervision of capital management including the application of an internal capital adequacy assessment process.

Pillar 3 - More extensive disclosure requirements.

Pillar 1

Capital is measured as prescribed by Australian Prudential Regulation Authority (APRA) prudential standards. These standards act to deliver capital requirements in respect of Credit risk, Market risk and Operational risk.

Credit risk

Credit risk is measured using the Standardised Approach defined in prudential standard APS112. The capital charge attached to each asset is based on weightings prescribed by APRA as detailed in the table below:

On balance sheet exposures	Risk weighting	Carrying value	Risk weighted value
Cash	0%	1,677,461	0
Deposits in highly rated ADIs	20%	490,844,196	98,168,839
Deposits in less highly rated ADIs	50%	0	0
Standard loans secured against eligible residential mortgages up to 80% LVR (up to 90% with Lenders Mortgage Insurance)	35%	1,442,175,669	504,761,484
Standard loans secured against eligible residential mortgages over 80% LVR	50-75%	502,249,539	256,607,817
Other standard mortgage loans	100%	13,332,299	13,332,299
Non standard mortgage loans	35-100%	28,849,395	21,742,645
Other loans	100%	323,012,363	323,012,363
Other assets	100%	39,322,593	39,322,593
Total		2,841,463,515	1,256,948,040

Off balance sheet exposures	Off balance sheet exposure	Credit conversion factor	On balance sheet equivalent	Risk weighting	Risk weighted value
Loans approved and not advanced	82,088,357	100%	82,088,357	35%-100%	40,736,622
Redraws available	206,118,274	50%	103,059,137	35%-100%	43,378,996
Guarantees	100	100%	100	100%	100
Unused revolving credit limits	228,886,540	0%	0		
Possible contribution to CUFSS	90,758,170	0%	0		
Total	607,851,441		185,147,594		84,115,718
Total weighted credit risk exposures					1,341,063,758

Market risk

The credit union is not required to allocate capital against market risk as no trading activity is undertaken and the standardised approach does not result in any allocation against interest rate risk in the banking book.

Operational risk

Operational risk is measured using the Standardised Approach defined in prudential standard APS114. The capital charge is based upon portfolio balances and revenue streams with scaling and risk factors applied to reflect APRA's assessment of the particular risk profiles.

Operational risk capital requirement for retail banking

	30-Jun-07	31-Dec-07	30-Jun-08	31-Dec-08	30-Jun-09	31-Dec-09
Total gross outstanding loans and advances for retail banking	1,622,485,960	1,806,909,058	2,030,435,538	2,147,790,127	2,196,038,725	2,313,217,856
- multiplied by 3.5% scaling factor	56,787,009	63,241,817	71,065,244	75,172,654	76,861,355	80,962,625
- multiplied by 12% risk factor	6,814,441	7,589,018	8,527,829	9,020,719	9,223,363	9,715,515
Average of the 6 half year results = Total operational risk capital requirement for retail banking						8,481,814

Operational risk capital requirement for commercial banking

Total gross outstanding loans and advances for commercial banking	273,508,037	324,702,391	337,051,878	664,669,204	648,421,913	490,890,671
- multiplied by 3.5% scaling factor	9,572,781	11,364,584	11,796,816	23,263,422	22,694,767	17,181,173
- multiplied by 15% risk factor	1,435,917	1,704,688	1,769,522	3,489,513	3,404,215	2,577,176
Average of the 6 half year results = Total operational risk capital requirement for commercial banking						2,396,839

Operational risk capital requirement for all other activity

Adjusted gross income	2,498,472	1,960,939	2,093,369	1,667,570	2,398,969	1,921,721
- multiplied by 18% risk factor	449,725	352,969	376,806	300,163	431,814	345,910
Average of the 3 annual results = Total operational risk capital requirement for all other activity						752,462
Total operational risk capital requirement						11,631,115
RWA equivalent amount for operational risk capital requirement = Operational risk capital * 12.50						145,388,940
Total credit and operational risk weighted						1,486,452,698

Capital resources

Tier 1 capital - The majority of Tier 1 capital consists of retained profits.

Tier 2 capital - Consists of capital instruments that combine the features of debt and equity in that they are structured as debt instruments, but exhibit some of the loss absorption and funding flexibility features of equity. There are a number of criteria that capital instruments must meet for inclusion in Tier 2 capital resources as set down by APRA. Tier 2 capital generally comprises a reserve for credit losses.

A minimum capital ratio of 8% is required to be maintained at all times. Our policy requires reporting to the board and the regulator if the capital ratio falls below 13.1%.

The capital ratio can be affected by growth in assets relative to growth in reserves and by changes in the mix of assets. The credit union manages capital through reviewing the ratio monthly and monitoring major movements in asset levels. Further, a 3 year capital projection is maintained to assess how strategic decisions or trends may impact on the level of capital. A stress test based on various asset growth and profitability assumptions is conducted annually.

Pillar 2 risk capital

Pillar 2 of the Prudential Framework relates to any risk factor to which an ADI might be exposed that is not included in Pillar 1.

These risks fall into 3 categories.

- Pillar 1 risks not fully captured by the Pillar 1 process, for example credit concentration risk.
- Inherent risks not covered by Pillar 1, including:
 - interest rate risk in the banking book
 - liquidity risk
 - strategic risk
 - reputation risk
- Risks arising from external factors such as business cycles effects and the macroeconomic environment.

The credit union documents, analyses and sets its own internal capital requirements to meet Pillar 2 risks.

The methodologies used to assess the required capital are a combination of quantitative and qualitative assessment and by their nature are based on a degree of collective subjective judgment of senior management and the board.

Internal capital adequacy management

The credit union manages its internal capital levels for both current and future activities through a combination of committees. The outputs of the individual committees are reviewed by the board in its capacity as the primary governing body. The capital required for any change in the credit union's forecasts for asset growth or unforeseen circumstances, are assessed by the board. The finance department then updates the forecast capital resources models produced and the impact upon the overall capital position of the credit union is reassessed.

Contingency buffer

Based on historical fluctuations in capital the credit union incorporates a contingency buffer of 1.1% when targeting minimum levels of capital and when preparing its Capital Management Plan to cover volatility in the risks identified above.

	RWA	Minimum capital required	% Equivalent of RWA
Operational risk	145,388,940	11,631,115	8.00%
Credit risk	1,341,063,758	107,285,101	8.00%
Total	1,486,452,698	118,916,216	8.00%
Pillar 2 uplift capital		59,458,108	4.00%
ICAAP capital required		178,374,324	12.00%
Buffer for business cycle volatility		16,350,980	1.10%
Capital available for future growth and product and service development		43,583,389	2.93%
Risk-based capital ratio		238,308,693	16.03%
Tier 1 capital ratio		224,901,098	15.13%
Tier 2 capital ratio		13,407,595	0.90%

Credit risk

The credit risk of a financial institution is the risk that customers (members), financial institutions and other counterparties will be unable to meet their obligations to the institution which may result in financial losses. Credit risk arises principally from the credit union's loan book and investment assets.

Liquid investments

The risk of losses on liquid investments is mitigated through the application of investment limits per counterparty based upon independent ratings of counterparties and by limiting exposure to groups of counterparties within a rating band. All investment must be with financial institutions with a rating in excess of BBB.

The board's policy is to maintain at least 60% of the investments in Cuscal Limited (Cuscal), a company set up to support their member credit unions and which has an A-1+ rating (short-term debt <= 12 months), AA- rating (long-term debt > 12 months).

The exposure values associated with each credit quality step are as follows:

Investments with:	No of Institutions	Carrying value	Past due value	Provision
Cuscal-rated A-1+ (short-term)	1	226,344,196	0	0
Cuscal-rated AA- (long-term)		120,000,000	0	0
Banks-rated A-1+ or A-1 (short-term)	4	92,500,000	0	0
Banks-rated AA (long-term)		10,000,000	0	0
Banks-rated A-2 (short-term)	2	42,000,000	0	0
Total	7	490,844,196	0	0

Loans

Carrying value is the value on the balance sheet. Maximum exposure is the value on the balance sheet plus the undrawn facilities (loans approved but not funded, redraw facilities, undrawn overdrafts and credit cards).

	Carrying value on balance sheet	Commitments	Other non-market off balance sheet exposures	Max exposure	Average gross exposure in the period
	\$'000	\$'000	\$'000	\$'000	\$'000
Housing	1,871,303	244,438	0	2,115,741	2,074,731
Personal	440,238	272,620	0	712,858	711,306
Total-natural persons	2,311,541	517,058	0	2,828,599	2,786,037
Corporate borrowers	46	35	0	81	82
Total	2,311,587	517,093	0	2,828,680	2,786,119

The commitments set out above comprise:

Outstanding loan commitments	\$'000
The loans approved but not funded	82,088

Loan redraw facilities

The loan redraw facilities available	206,118
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Undrawn loan facilities

Loan facilities available to members for overdrafts and credit cards are as follows:

Total value of facilities approved	312,252
Less: Amount advanced	-83,365
Net undrawn value	228,887

These commitments are contingent on members maintaining credit standards and ongoing repayment terms on amounts drawn.

Total loan commitments	517,093
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Impairment

Impairment of a loan is recognised when there is reasonable doubt that not all the principal and interest can be collected in accordance with the terms of the loan agreement. Impairment is assessed by specific identification in relation to individual loans and by estimation of expected losses in relation to loan portfolios where specific identification is impracticable.

Bad debts were written off when identified and are recognised as expenses in the income statement.

All loans and advances are reviewed and graded according to the anticipated level of credit risk. The classification adopted is described below:

Non-accrual loans are loans and advances, including savings accounts drawn past their approved credit limit, where the recovery of all interest and principal is considered to be reasonably doubtful. Interest charged and not received on this class of loan is not recognised as revenue. APRA has made it mandatory that interest is not recognised as revenue after irregularity exceeds 90 days for a loan facility or 15 days for an over limit overdraft and credit card facility or 15 days for overdrawn savings account.

Restructured loans arise when the borrower is granted a concession due to continuing difficulties in meeting the original terms, and the revised terms are not comparable to new facilities of comparable risk. Loans, where interest has been stopped or is less than the credit union's average cost of funds, are included in non-accrual loans.

The level of impaired loans by class of loan is set out below:

- Carrying value is the balance gross of provision (net of deferred fees).
- Past due loans as per APS 220 Credit Quality is the 'on balance sheet' loan balances which are behind in repayments by 90 days or more, well-secured and not impaired.
- Impaired loans value is the 'on balance sheet' loan balance and includes non-accrual loans and restructured loans. Provision for impairment is the amount of the impairment provision allocated to the class of impaired loans.
- The losses in the period equate to the additional provisions set aside for impaired loans and bad debts written off in excess of previous provision allowances.

	Carrying value on balance sheet	Value of loans that are past due	Value of loans that are Impaired	Provision for impairment	Provision movement for impairment	Bad debts in the period
	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
Housing	1,871,303	0	6,827	65	-182	13
Personal	440,238	0	5,224	1,902	365	345
Total-natural persons	2,311,541	0	12,051	1,967	183	358
Corporate borrowers	46	0	2	1	-2	0
Total	2,311,587	0	12,053	1,968	181	358

The impaired loans are generally not secured against residential property. Some impaired loans are secured by mortgage over motor vehicles or other assets of varying value. It is not practicable to determine the fair value of all collateral as at the balance date due to the variety of assets and condition.

Reserve for credit losses

In addition to the above provision for impairment, the board has recognised the need to make an allocation from retained earnings to ensure there is adequate protection for members against the prospect that some members will experience loan repayment difficulties in the future. The reserve is based on estimation of potential risk in the loan portfolio based upon the level of security taken as collateral.

The reserve has been determined on the basis of the past experience with the loan delinquency and amounts written off. The amount of the reserve is currently \$15,598,761. The value of the reserve is amended to reflect the changes in economic conditions and the relevant concentrations in specific regions and industries of employment within the loan book.