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Credit Policy | Verifying Transaction Account/s, Account Conduct and Commitments / Expenditure

An applicant's ongoing financial commitments and expenditures are captured to determine their ability to service a loan. To do so, we must:



- Determine which commitments need to be captured, based on who the borrowers are;
- Identify all of the applicant's commitments and capture them in the application (disclosed and undisclosed);
- Verify the commitments and check account conduct and include all supporting documentation when required;
- Capture the applicant's monthly living expenses;
- Where the applicant receives rental income, capture the associated rental expenses as part of the Rental Income calculation.



It's important that all necessary information is captured correctly, and any supporting documents provided exactly match the application. This ensures we can make a decision on the application the first time around.



Requirements for capturing and verifying commitments and expenses are detailed below.

Overview of Commitments / Monthly Living Expenses / Rental Expenses

Capture Commitments

Transaction Account Review and Undisclosed Commitment Check

Verify commitments and Check Account Conduct

Commitment/Liability and Account Conduct Declarations

Monthly Living Expenses

Rental Expenses and for Investment Properties

OVERVIEW OF COMMITMENTS / MONTHLY LIVING EXPENSES / RENTAL EXPENSES

There are three main categories of commitments and expenses that need to be captured as part of the application. The applicant's commitments and expenses must be correctly categorised to ensure their application is accurately assessed.

Commitments (also referred to as liabilities)

Monthly Living Expenses (MLE)

Rental Expenses (from an investment property)

Commitments are ongoing financial debts or facilities. They are typically repaid or held over an extended period of time (e.g. over a year) and are bound by contractual terms. Commitments include fixed commitment repayments (such as loans) or limit facilities (such as credit cards) and generally cannot be easily cancelled or stopped without settlement.

Existing commitments are those which existed prior to taking out a home / investment home loan and all are required to be captured when determining an applicant's serviceability.

Monthly living expenses refer to all other expenditure associated with the cost of living, including regular necessary spending, such as electricity and groceries, as well as discretionary spending (e.g. Pay TV, luxury items etc.).

To ensure that we are able to provide the applicant with an appropriate loan amount that they can afford, living expenses should be captured as accurately as possible. The applicant's declared living expenses should include existing expenses that will continue to be incurred, and any new expenses that will be incurred after the loan is funded. It does not include investment property expenses (these are captured as rental expenses where rental income is used for servicing).

Sole use of the Household Expenditure Measure (HEM) is not an acceptable way Rental expenses include all expenditure required to maintain an investment property. Rental expenses are not to be included as MLE, but rather a reduction of rental income, captured at an individual property level.

It does not include mortgage repayments, interest, depreciation, oneoff repairs and maintenance expense

s, capital improvement costs or write-offs, or loss of rent due to vacancy periods.

Where an applicant receives rental income the amount of rental expenses required to maintain the property must also be determined.

For additional guidance on capturing rental expenses, refer to Gross Rental Income.

to capture living expenses and may result in the inability for an applicant to meet their new home loan commitments.

For additional guidance on capturing

https://www.commbroker.com.au/Net/Documentum/credit-policy/verifying-expenditure.aspx

MLE as well as household details, refer to Monthly Living Expenses.

Examples of commitments and living expenses are included below (but are not limited to):

Rental Expenses (from an investment Commitments Monthly Living Expenses (MLE) property) Basic Living Expenses (included in the HEM comparison) **Fixed Repayment Commitments** Food and groceries Home Loans / Investment Loans Utilities (electricity, gas, water etc.) Personal Loans (including short term loans, such as Wizard Wallet, Nimble, ▶ Primary residence maintenance costs Rental expenses include Speckle, etc.) Phone and internet ▶ Hire Purchase / Equipment finance ▶ PayTV and subscriptions (e.g. Netflix, (e.g. Flexirent) Spotify) Strata and other body corporate fees Business Loans > Tertiary and public education and Property management fees training (excluding loans such as Store interest-free finance paid over Insurances HELP etc.) an extended period of time, with no Council rates fixed repayment Clothing and personal care Land tax Fixed repayment plans (e.g. > Transport and auto Denticare) Utilities Registrations and repairs Novated lease. Note: Novated leases Ongoing repairs and maintenance Medical, health and fitness are paid as part of an applicant's Insurance salary package. You're only required Recreation, travel and entertainment Rental expenses don't include: to verify the repayment amount for these facilities. A payslip is an Childcare Mortgage repayments acceptable verification document for Pet care Interest Novated leases. ▶ Purchases made using some Buy Depreciation Now, Pay Later facilities (e.g. One-off repairs and maintenance **Limit Facility** Afterpay, StepPay) expenses Viridian Lines of Credit Fines Capital improvement costs or write-Overdrafts ▶ Charge cards without a limit (includes Credit cards Flexible Payment Option 'FPO') Loss of rent due to vacancy periods Commercial credit cards Additional Living Expenses (excluded Business lines of credit from the HEM comparison) Credit limit facilities Strata and other body corporate fees Some Buy Now, Pay Later facilities (on own dwelling) (e.g. Zip Money) Gardening ▶ Charge cards with a limit. ▶ Secondary residence costs – e.g. holiday homes Other Private school fees Margin loans ▶ Personal insurances – e.g. life Child maintenance insurance Centrelink debt Beauty treatments Court ruled debt Overseas travel > Australian Taxation Office (ATO) debt Recreational vehicle expenses and Government study and training insurances support loans (including HELP) Annual land and property tax Rental payments or board (included Note: It is important to ensure these are only if still payable after new home / input in the correct category (Basic or investment loan is funded) Additional) in the calculators due to the Conditional gifts. comparison to HEM.

Buy Now, Pay Later (BNPL) facilities:

- ▶ BNPL facilities, which are paid over a short period of time in equal instalments, have a small limit (generally no more than \$2,000), and do not incur any interest or fees when paid within that period. Expenditure using these facilities should be treated as a living expense and captured in each relevant category (e.g. BNPL used to purchase clothing should be captured under 'Clothing and personal care' MLE category). Examples include AfterPay, Zip Pay and StepPay.
- ▶ BNPL facilities with a reusable set credit limit paid over an extended period of time that incur interest and / or fees should be treated the same way as a credit card commitment (i.e. as a commitment and not a living expense). For example, Zip Money.
- Some BNPL providers may have varving product options (e.g. Humm), or are offered by a credit card provider (e.g. Latitude

Pay). You must understand from your customer the nature of the facility to determine if it's to be included in their living expenses, or captured as a commitment.

Charge Cards:

A traditional charge card is a type of credit card that has no set limit, no interest rate and the balance must be paid off in full every month (otherwise a fee will be charged). If your customer tells you they have a charge card, confirm if it has a limit as this will determine how it should be captured. Indicators that a card has a limit include:

- If the customer advises that there is a limit;
- A limit is quoted on the statement;
- If the statement has a minimum percentage payment of the closing balance (e.g. if the minimum payment equates to 2.5% of the closing balance), or if it quotes an interest rate.

If your customer's charge card has	Then
A limit	The charge card must be captured as a commitment in the same way as a credit card.
No limit	Expenses incurred on the charge card should be included in monthly living expenses and no verification is required. However, the balance of the charge card must be captured on the balance sheet.

CAPTURE COMMITMENTS

An applicant's commitments need to be captured in their Financials to ensure that we can appropriately assess their loan and DTI ratios.

The commitments required to be included in an application, will depend on:

- ▶ Whether the borrower is personal or non-personal;
- ▶ What is the source of income being used to service the application; and
- Whether the borrower provides any servicing guarantees to other entities.

For guidance on which commitments need to be captured, refer below:

		If the	commitment is held und	er a
		Personal name	Sole trader/partnership	Company
Source of income used for servicing	PAYG	Include in applicant's personal liabilities	✓ A Include in applicant's personal liabilities	X*
	Self-employed income from a Sole Trader / Partnership	✓ Include in applicant's personal liabilities	✓ A Include in applicant's personal liabilities	X*
	Self-employed income from a company	✓ Include in applicant's personal liabilities	N/A	Include repayments in the Company Loan repayment field as part of self-employed income

^{*} You don't need to capture company commitments in the borrower's personal balance sheet if:

Simple Verification is being used to capture self-employed income from a company; or

There's no reliance on an applicant's self-employed income from a company for servicing, and the applicants are just shareholders (no servicing guarantee); or

There's no reliance on an applicant's self-employed income from a company for servicing, and the applicant is a servicing guarantor. However, you'll need to confirm and include in the application comments that the business, from which the self-employed income is derived, is trading profitably and any business liabilities have been included for servicing. Refer to Eligible Income > Self-Employed for more details.

TRANSACTION ACCOUNT REVIEW AND UNDISCLOSED COMMITMENT CHECK

You will need to review one month's primary transaction account statement or Internet banking transaction listing for any on-going commitments or liabilities that may have been overlooked. If you find any, confirm the details with the customer and include in the application.

A customer's primary transaction account(s) includes the account where your customer's primary source of income (e.g. PAYG salaries, government payments, income from business used in servicing) is credited and where most payments/direct debits are made from. As the main purpose of this check is to find undisclosed commitments, if the customer operates from an account that is different to their primary transaction account, you must check both/all accounts.

In some instances depending on the net monthly servicing (NMS) you may be required to supply the primary transaction account statement or Internet banking transaction listing.

Resources

If	Then
 NMS is \$225 or over and/or The customer's primary transaction account is a CommBank account held in their personal name (regardless of NMS) 	No requirement to provide the transaction account
 NMS is under \$225 and the customer's primary transaction account is with an OFI 	Supply one month's primary transaction account statements and/or internet banking transaction listing for an undisclosed liability check. If your customer is eligible for Simpler Liability Verification, different criteria applies. Refer to Simpler Liability Verification to determine whether your customer is eligible.

Note: Credit will determine the final NMS. Apply Online may be used as a guide.

VERIFY COMMITMENTS AND CHECK ACCOUNT CONDUCT

Once all commitments/liabilities have been entered into the application, each commitment must be verified and account conduct checked. The type and amount of documentation required to be submitted for review, will depend on what the commitment is and whether it is visible in Comprehensive Credit Reporting (CCR).

Verification and account conduct check of commitments found by the Bureau / CCR

Where a customer's personal OFI Credit Card, Home Loan or Personal Loan is held with an Australian financial institution and is in personal names, Credit will rely on information obtained through CCR (if available). This data is used to:

- Verify the commitment/liabilities details (i.e. account ownership, account number, limit or balance etc.)
- Check the account conduct for each individual commitment/liability by reviewing the last 6 complete months of CCR data from the application date.

You are able to determine whether documents are required to be submitted by reviewing the **Credit Report** available in **Financial Passport** by following the process below.

Step	Detail	
1.	Ensure <u>all</u> commitments/liabilities that are visible in CCR Note: If a commitment has since been closed, but is still the application and evidence of closure provided.	are included within the application. visible in CCR, the commitment must be still be included in
2.	·	•
	 All zeros; or All zeros, with a P or R in the most recent completed month reviewed. The applicant is currently up to date, at the time of application and a zero is observed in the most recent	Ensure the commitment/liability is included in the application. No documentary evidence is required to be provided. Ensure the commitment/liability is included in the application. Include an explanation for any late

	repayments from your customer in the application	
completed month, but late payments have been observed over the review period.	comments. No documentary evidence is required to be provided.	
Any other situation	Ensure the commitment/liability is included in the application. Obtain documentary evidence that the customer is up to date with their repayments and include explanations from your customer in the application comments for any late repayments.	
Note: We may still request additional documents to assist with their assessment and processing of the application		

(e.g. for debts being refinanced). You will need to provide any additional documentation they require to reduce

Verification and account conduct check of commitments where CCR data is unavailable

delays in assessment.

When CCR data is unavailable for a commitment/liability, or the commitment/liability is held in a non-personal name or with an overseas financial institution (OFI), refer to the below table for verification and conduct requirements.

Commitment/Liability	Documentation and verification requirem	ents
	Please provide bank/loan statements or inte	rnet banking transaction listings with en
	date of no more than 6 weeks old from the date of the application.	
	The following information must be verified:	
	▶ Account holders name	
	▶ Account number	
	▶ Limit or balance (including any redraw fa	cility)
	▶ Evidence of the most recent required rep	payment
	One or a combination of documentary inform	nation sources can be used to verify the
	relevant information listed above, including to	out not limited to:
	▶ Statements (paper, PDF, electronic)	
	▶ Online transaction listings	
	▶ Online account summaries	
OFI loans and limit facilities (such as	▶ Where the OFI liability does not provide	statements or transaction listings, the
Credit Cards, Home Loans and	following evidence can be provided:	
Personal Loans)	 Loan contract, schedule or correspon account holder's name, repayment ar 	•
	A transaction listing/statement showir	
	the provider for the same repayment	
	schedule/contract	amount appearing on the loan
	Note: Additional information must be captured in your application however	
	documentary evidence is not required (e.g. remaining loan term, interest rate,	
	repayment amount and type, remaining interest only term etc.).	
	Note: Where the commitment is held by an	overseas financial institution and the
	document provided is in a foreign language, your customer must provide a copy of the	
	documents with an English translation from a translator at the level of professional	
	translator (or above) currently accredited by the National Accreditation Authority for	
	Translators and Interpreters Ltd (NAATI). Th	e document and the translation must be
	sent to the application.	
	Obtain a letter/document from OFI which co	nfirms the new liability and limit or loan
OFI loans and limit facilities which have been newly established within the	amount approved. The document must include the account holder's name and either	
past month so there is no evidence on	the repayment amount + loan amount (for fixed facilities) or limit (for limit facilities).	
CCR and the first statement has not	Include clear application comments to advise	e that the above document(s) have beer
been issued yet	obtained as the CCR data for this commitment has not started reporting yet.	
	Verify loan details to margin loan statement and include the outstanding balance in the	
Margin Loans	balance sheet.	and the satisfiantly salarioo in t
Lease	If the lease is	Then
	Deducted via salary sacrifice	Ensure the full repayment amount is

		Refer to instructions in the Eligible Income - Salary Sacrifice Arrangement page.	
	Paid via direct debit	Refer to requirements for OFI loans at limit facilities above.	
	Rental and board is only required to be ver	fied if it will continue after the loan funding	
	Arrangement	Verification documents required	
		One of the following:	
	Rental Payments made to a Real Estate agent or via private lease agreement	 1 month's transaction account bank statements and/or Internet banking transaction listing Current lease agreement Statement or letter from the managing agent (not acceptable for private lease agreement). 	
		Both of the following:	
Rental and board	Rent or board paid to parents or related family member. This is only required where the declared rent or board is more than \$650 per month (\$150 per week).	 1 month's transaction account bank statements and/or Internet banking transaction listing Letter from parent or related family member 	
	Rent or board free arrangement (excluding spouse), e.g. applicant is living at home and not paying rent or board	A notional amount of \$650 per month (\$150 per week) is to be included in the application and servicing calculations for customers.	
	Rent or board free arrangement when living with spouse, where the spouse holds the lease agreement/mortgage title and is not an applicant.	No verification required. Notional rent does not need to be applied.	
	Workplace arrangement with employer to have their rent / accommodation paid for or subsidised	Provide evidence of the employer provided rent via a payslip or employment contract.	
	Note: Where a borrower has declared they're paying rent or board which is less than \$650 per month, the minimum acceptable rental amount of \$650 per month must be used (unless it is a rent free arrangement when living with spouse). If you believe that notional rent should not apply, ensure you include details in the application comment		
	Verify the amount declared by the applican	t to one of the following:	
Child maintenance (non-court ruled)	 1 month's transaction account statements; or 1 payslip showing the payment. Note: For shared custody arrangements, refer to the Monthly Living Expenses page on how to capture the commitment and household details 		
	Verify the amount declared by the applican	t to both of the following:	
Child maintenance (court ruled)	 1 month's transaction account statements or one payslip showing the payments; and Family Law Court Order. Note: For shared custody arrangements, refer to the Monthly Living Expenses page. 		
Centrelink debt	on how to capture the commitment and Verify the total Liability amount owing and r		
COMORINA GODI	Centrelink statement showing total liabil	ity.	
	Note: Where the repayments are being dec	audieu directiy irom the customer's curre	

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	repayment amount is required.		
	Verify the repayment amount declared to the	e following:	
Court ruled debt	Court Order.		
	Verify the total Liability amount owing and r	epayment amount declared to the following:	
Australian Tax Office (ATO) debt		•	
	ATO issued correspondence/statement outlining the repayment schedule.		
	Study and training support loans are available from the Australian Government to help complete further training and study. These include:		
	▶ Higher Education Help Program (HELP) (Previously known as Higher Educations Contribution Scheme (HECS))		
	▶ VET Student Loan (VSL)		
	. , , ,	OY Student Start-up Loan (ABSTUDY SSL)	
	▶ Trade Support Loan (TSL)	(0.500)	
	Student Financial Supplement Scheme	` '	
	The balance provided by the customer is acceptable so there's no need for verification Please refer to the ATO website to confirm the Study and training loan repayment thresholds and rates.		
	The repayment is calculated on the Gross	Annual Eligible Income used for servicing	
Government study and training support	Example: if an applicant's assessed income for servicing is \$69,550 per annum.		
loans	Income type	Gross Annual Eligible income for servicing	
	PAYG Base	\$50,000	
	PAYG Bonus	\$8,000 (\$10,000 x 80%)	
	Rental	\$11,550 (\$15,000 x 90% less rental expenses of \$1950)	
	Total income	\$69,550	
	Then income to calculate the rate on is \$69,550.		
	Note: A customer may elect to pay their Government study and training loan repayments from their PAYG salary. If this has been confirmed with the customer, and salary credits are being used to verify income, there is no need to include a commitment amount for Government study and training loan for servicing as it would have already been deducted from the customer's (gross) income.		
	Verify amount and details of any repayment arrangement to the following:		
	▶ A signed letter from the provider if gift is \$100,000 or above.		
	Note:		
Conditional gifts	If the conditional gift is below \$100,000, then customer declared commitment can be relied on.		
	If the gift is conditional, i.e. there are agreed repayment arrangements, it's expected these repayment arrangements wouldn't commence until the borrowers are in a position to make these additional repayments without impacting their ability to meet their commitment to the Bank.		
	If you aware repayments are to commence when the loan is funded, make sure you included these repayments as commitments when assessing serviceability.		
	Obtain the Loan agreement/contract schedule.		
Working capital loans (e.g. PayPal	Identify the minimum payment and convert this amount to monthly repayment amounts.		
Working Capital)	Add as an ongoing commitment.		
	Obtain evidence that the most recent required repayment has been made.		

Confirm the liability declaration with the customer:

Have you asked and has the customer confirmed all their commitments and liabilities have been disclosed to the Bank (e.g. loans from other institutions, ATO debts, child support, loans from friends or family members)?

If	Then
Yes	Select 'Yes' and proceed with the application.
	Update the application with all the additional commitments advised by the customer.
No	Note: you are unable to proceed with the application until the response to this question is 'Yes'

Confirm the account conduct declaration with the customer:

Have you asked and has the customer confirmed they are up-to-date and will continue to be up to date on repayments for all their commitments and liabilities and are not aware of any outstanding debts or disputes with third parties?

If	Then
Yes	Select 'Yes' and proceed with the application.
No	Obtain an explanation from your customer and, where available, evidence of the most recent payment being made. Proceed with the application.

MONTHLY LIVING EXPENSES

Discussion with the applicant as to what living expenses are incurred on a monthly basis needed to maintain a reasonable standard of living. No verification is required. Refer to Monthly Living Expenses for further details on capturing Monthly Living Expenses and Household details.

RENTAL EXPENSES FOR INVESTMENT PROPERTIES

A customer's investment property expenses (rental expenses) are to be captured at the individual property level where rental income

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