

**From:** [renshang](#)  
**To:** [Basel Committee, Service](#)  
**Subject:** comment on The internal audit function in banks - consultative document  
**Date:** Sunday 26, February, 2012 09:46:18

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Dear Sir/Madam,  
Ni Hao.

I am an internal audit manager in the Postal Savings Bank of China (PSBC, the 6th largest bank in terms of total assets in China).

After reading The internal audit function in banks - consultative document(Dec.2011), I have a piece of advice concerning the content of three lines of defence, paragraph 58 on p.11.

In Chinese big banks, like ICBC, ABC, BOC, CCB, there are two special departments: Discipline Enforcement Department and Security Department. The main responsibility of the two departments follows respectively:

---Discipline Enforcement Department: Check on problems adherence to and enforcement of laws, regulations, and decisions and orders of the people's government in the bank.

---Security Department: Swindle prevention & control

According to the responsibility description and practice in China, these two departments should be classified as monitoring functions. Since they are very crucial and popular in Chinese banking sector, I suggest that you put the names of these two departments into paragraph 58, "...Other monitoring functions may include human resources , the legal , the discipline and the security department."

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