

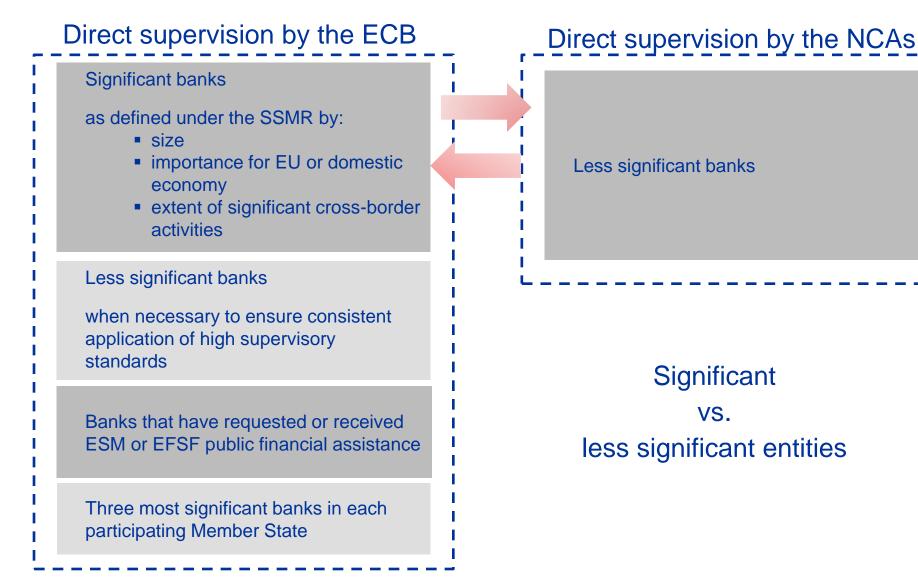
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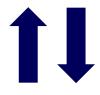
Regulatory reporting in the light of the SSM Industry and supervisors new challenges

* The views expressed are those of the presenters and do not necessarily reflect the position of the ECB.

1	Introduction: Statistics and the SSM
2	Supervisory Statistics: Organisation, activities and deliverables
3	IT structure and data flows
4	Data quality
5	Challenges for supervisors and for banks
6	Conclusion



Concerns all Banks in euro area (+/- 6000 Banks)



Close cooperation with National Competent Authorities

Tasks assigned to the ECB

Inter alia

Icensing and authorising credit institutions,

assessing qualifying holdings,

ensuring compliance with the minimum capital requirements,

ensuring the adequacy of internal capital in relation to the risk profile of a credit institution

 conducting supervision on a consolidated basis and supervisory tasks in relation to financial conglomerates.

ensuring compliance with provisions on leverage and liquidity, applying capital buffers and carrying out, in coordination with resolution authorities, early intervention measures when a bank is in breach of, or is about to breach, regulatory capital requirements. DG-S is the overall data provider for ESCB tasks: **Article 5 (Statute)**: "In order to undertake the tasks of the ESCB, the ECB, assisted by the national central banks, shall collect the necessary statistical information, either from the competent national authorities or directly from economic agents."

DG Statistics:

Develops, collects, compiles and disseminates statistics

Statistical domains:

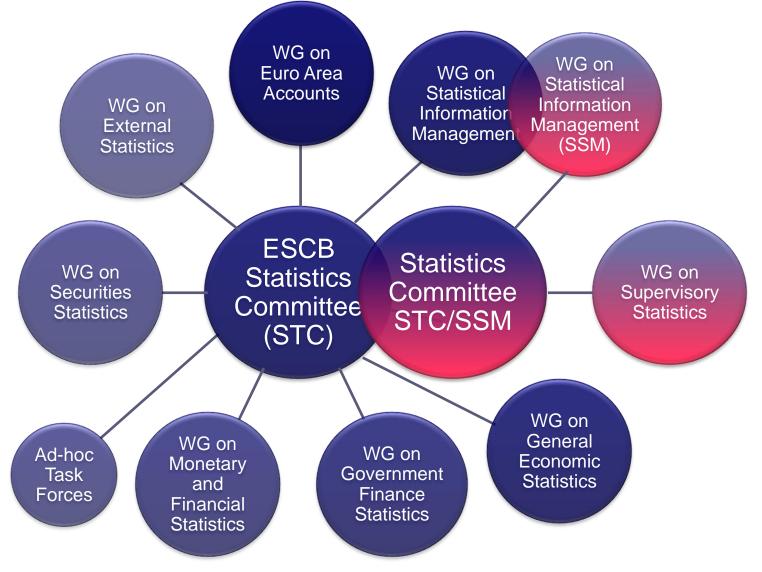
Monetary, financial institutions and financial markets statistics Develops, manages and applies the tools, databases and data processes Defines the concepts and classifications of the statistics used by the ECB and makes statistics available

Balance of payments, international investment position, international reserves and other external statistics Macroeconomic statistics

Survey data of households and enterprises

Supervisory Statistics Division – Introduction

Statistical cooperation in the ESCB and SSM



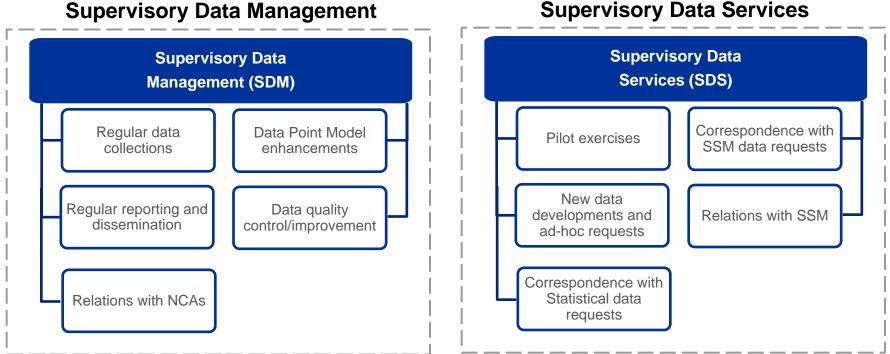
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The **Supervisory Statistics Division** (SUP) manages Supervisory reporting data and provides services to SSM related to these data.

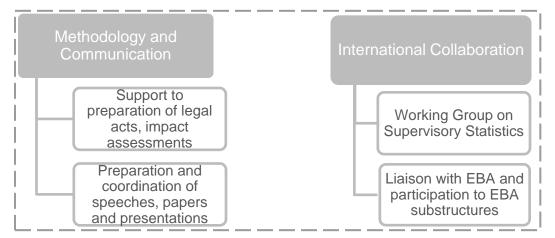
In practice, **SUP is responsible to:**

- 1. Develop, collect, compile and disseminate the datasets and quantitative risk reports for supervisory purposes. This entails the coordination, receipt, quality management and reconciliation of supervisory data of credit institutions, including those based on the implementing technical standards of EBA (e.g. COREP, FINREP). SUP controls and monitors (not ensures) the quality of data received.
- 2. Establish the **governance framework for SSM data management** from all Significant Institutions (SIs).
- Receive, store and disseminate the relevant data on the indirectly supervised banks ("less significant banks").

Supervisory Statistics Division – Organisation



Horizontal functions

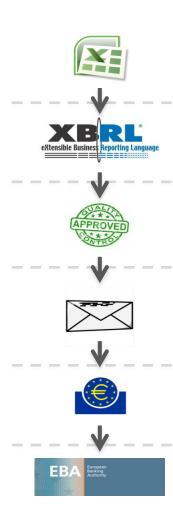


Supervisory Data Services

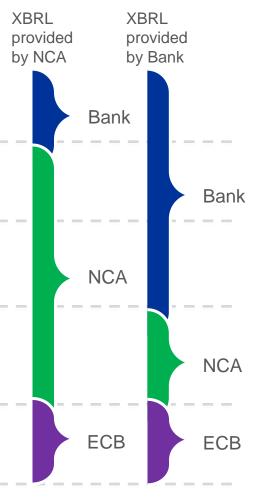
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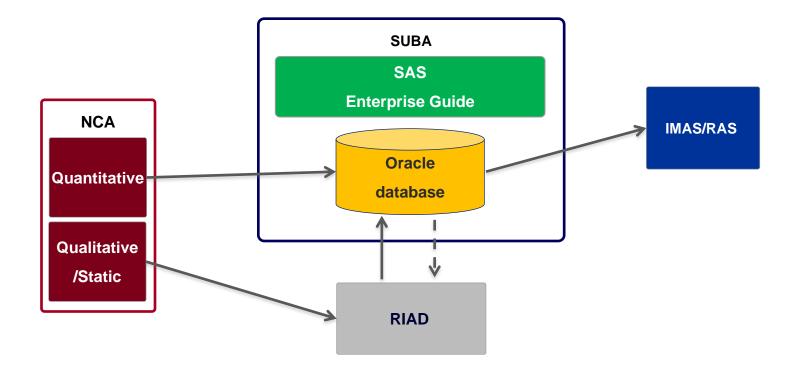
IT structure and data flows

Sequential approach: Responsibility lies within the compiler



- Reports are imputed in XLS or any other transmission format
- Reports are transposed into XBRL format
- Validation rules are applied
- XBRL file is zipped into an envelope according to the naming convention
- Data is transmitted to ECB
- Additional checks at ECB
- Data is transmitted to EBA





Overview of all regular data collections

SSM Reporting requirements			Significant	Institutions		Less Significant Institutions			
		CONS (Ultimate Parent)	SOLO (Stand Alone)	SUB-CONS (intermediate parent)	SOLO (Separate Parent / SUBs)	CONS (Ultimate Parent)	SOLO (Stand Alone)	SUB-CONS (intermediate parent)	SOLO (Separate Parent / SUBs)
COREP (incl.	Lev. Ratio)	Mar -2014 31-Jul-14	Mar-2014 31-Jul-14	Dec-2014 18-Mar-15	Dec-2014 18-Mar-15	Dec-2014 25-Mar-15	Dec-2014 25-Mar-15	Dec-2014 01-Apr-15	Dec-2014 01-Apr-15
	IFRS	Sep-2014 02-Dec-14	Draft ECB	Dec-2014 18-Mar-15	Draft ECB	Dec-2014 25-Mar-15	Draft ECB	Dec-2014 01-Apr-15	Draft ECB
FINREP	nGAAP	Draft ECB Decision	Decision	Draft ECB Decision	Decision	Draft ECB Decision	Decision	Draft ECB Decision	Decision
Liquidity Coverage Ratio		Mar-2014 21-Aug-14	Mar-2014 21-Aug-14	Dec-2014 19-Feb-15	Dec-2014 19-Feb-15	Dec-2014 26-Feb-15	Dec-2014 26-Feb-15	Dec-2014 05-Mar-15	Dec-2014 05-Mar-15
Net Stable Funding Ratio		Mar-2014 31-Jul-14	Mar-2014 31-Jul-14	Dec-2014 18-Mar-15	Dec-2014 18-Mar-15	Dec-2014 25-Mar-15	Dec-2014 25-Mar-15	Dec-2014 01-Apr-15	Dec-2014 01-Apr-15
Additional liquidity monitoring (to be adopted by EU COM)		Jul-2015 11-Sep-15	Jul-2015 11-Sep-15	Jul-2015 11-Sep-15	Jul-2015 11-Sep-15	Jul-2015 18-Sep-15	Jul-2015 18-Sep-15	Jul-2015 5-Oct-15	Jul-2015 5-Oct-15
Large Exposures		Mar -2014 31-Jul-14	Mar-2014 31-Jul-14	Dec-2014 18-Mar-15	Dec-2014 18-Mar-15	Dec-2014 25-Mar-15	Dec-2014 25-Mar-15	Dec-2014 01-Apr-15	Dec-2014 01-Apr-15
Asset encumbrance (to be adopted by EU COM)		Dec-2014 25-Feb-15	Dec-2014 25-Feb-15	Dec-2014 18-Mar-15	Dec-2014 18-Mar-15	Dec-2014 25-Mar-15	Dec-2014 25-Mar-15	Dec-2014 01-Apr-15	Dec-2014 01-Apr-15
Lending collateralized by immovable property		Jun-2014 01-Sep-14	Jun-2014 01-Sep-14	Dec-2014 18-Mar-15	Dec-2014 18-Mar-15	Dec-2014 25-Mar-15	Dec-2014 25-Mar-15	Dec-2014 01-Apr-15	Dec-2014 01-Apr-15

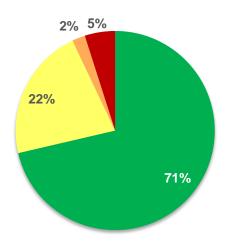
EBA ITS data to be transmitted to the EBA. Collections already startedEBA ITS data to be transmitted to the EBA. Future data collectionsAdditional EBA ITS Data to be collected by the ECB

Additional data requirements of the SSM to be collected by the ECB

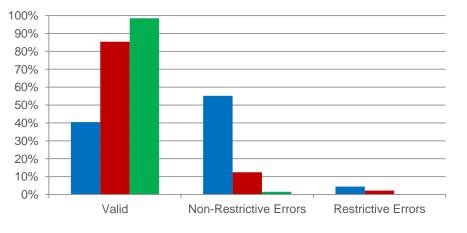
Source: SSM Supervisory Reporting Manual. Dates reflect first remittance of ITS data to ECB.

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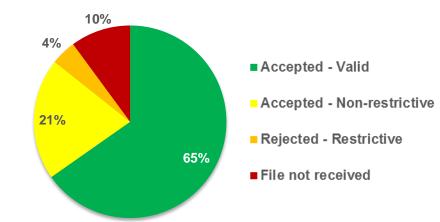
COREP (incl. LR), LE & NSFR Data Received for March 2014



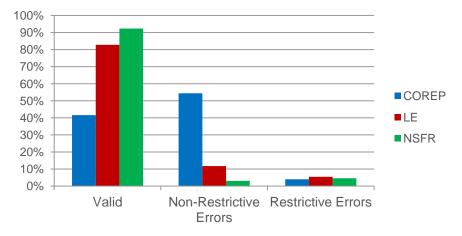
File Error Status by Module Type March 2014



COREP (incl. LR), LE & NSFR Data Received for June 2014



File Error Status by Module Type June 2014



* Status as at 12:00 on 17/09/2014

Quality of data – Under development

			Status						All reports	5	
	CO	DREP	LE	NSFR	R etc.			Failed validat.	Resub.	Days delay	Av. days delay
Bank 1						†	Bank 1		1		
Bank 2						†	Bank 2		1	1	
etc.						†	etc.		1	('	
Bank		Fai vali	COR	Failed			NSF	FR			
Bank		-+	Bank 1	validat		Faile			Etc.		
etc.			Bank 2		Bank 1	valid		Failed validat		b. Days delay	
		Ĺ	etc.		Bank 2		Bank 1				
				Γ	etc.		Bank 2	2			
							etc.				

Quality of data – Under development

	Completeness									
	DP	DP	DP	DP	DP	DP	DP	DP	Etc.	Total
Bank 1										
Bank 2										
etc.										
Total										

	Variance/changes							
	Currency	unit	Geo. presence	DP (solv. Ratio)	Number of DP	DP	DP	Etc.
Bank 1								
Bank 2								
etc.								

	Lev. ratio	Solv. ratio	DP	DP	Etc.
Bank 1					
Bank 2					
etc.					

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Challenges for supervisors are:

- 1. Supervisory data process and control data quality **improvement.**
- 2. Definition of **derived statistics and indicators** for the Risk Assessment.
- 3. The further development and harmonisation of supervisory reports.
- 4. Create **synergies**, **reduce redundancies** and successfully **combine** the statistical with the supervisory expertise.

Challenges for banks are:

- 1. Understand ECB practices and reporting requests.
- 2. Improve data quality.
- 3. Be **proactive** in communication Build **trust**

Other stakeholders? Single Resolution Board?

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EMERGENCE OF BASEL 4 IMPLICATIONS FOR BANKS Basel 4 Already emerging? Capital requirements Simplicity Liquidity requirements - Front stop leverage ratio T Disclosure requirements - Less reliance on internal models National divergences National standards Risk sensitivity - National standards Minimum requirements post stress testing Use of internal models in decision making Systemic risk buffers (cepital and liquidity) Regulatory requirements - Piller 2 capital Disclosure Enhanced requirements to aid comparability Basel 3 Strengthened global capital and liquidity regulations **Parallel tracks Capital reform** Large exposures Macro-prudential tools - Quality of capital base Securitisation Structural separation - Quantity of capital Localisation Wholesale conduct -Leverage - Counterparty credit risk Retail conduct SIFI surcharges Recovery and resolution EU banking union Liquidity standards planning -Liquid assets buffer Risk governance -Structural position **Bail-in liabilities** Risk data aggregation Time

Source: KPMG - Evolving banking regulation - 2014

Thank you!