



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

ECB Guide to fit and proper assessments and fit and proper Questionnaire

Institution/Company

German Banking Industry Committee

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General comments

Template for comments

ECB Guide to fit and proper assessments

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant chapter/subsection/paragraph/page, where appropriate;
- you indicate under "Type of comment" whether your comment is a proposed amendment, clarification or deletion.

Deadline: Midnight of 2 August 2021

ID	Chapter	Section	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	1. Scope of the ECB's fit and proper assessments			5	Deletion	With regard to key function holders and managers, the explanations in the guide lead to a far-reaching, unjustified equality of members of the management body and key function holders. Key function holders (KFH) are precisely not members of the management board. Such de facto equality lacks any sufficient legal basis and would constitute an impermissible new requirement. It is also disproportionate and blurs the responsibilities to which the ECB otherwise attaches great importance. Some member states (e.g. Germany) do not require any assessment of KFH through the supervisory authority / NCA. We see no legal basis in CRD to apply the fit and proper regime to KFH. Therefore we ask for that the relevant references to KFH be deleted from the guide.	We recommend deleting the comments on key function holders and managers throughout the guide.	Wittschorek, Maren	Publish
2	3.1 Experience	3.1.3.2 Practical experience	Table 1 and 2	11	Amendment	Within the thresholds for the presumption of sufficient experience for the management body in its executive function, it is required that "a significant portion" of such experience is related to senior level managerial positions. In the footnote 20, it is specified that senior level managerial position is to be intended as <u>one level below the management body</u> in its management function. We suggest to introduce a sort of proportionality principle, in order to consider also positions <u>two levels below the management body</u> in its management function when it comes to large entities, such as the Holding of a Banking Group.	We suggest to introduce a sort of proportionality principle, in order to consider also positions <u>two levels</u> below the management body in its management function.	Wittschorek, Maren	Publish
3	3.1 Experience	3.1.4 Special cases		13	Clarification	It is reported that practical experience can be covered by training (also in connection to page 41 where it is reported the concept of "appropriate understanding" and not by mandatory experience). Please can you confirm?	We suggest to clarify, that training can replace practical experience.	Wittschorek, Maren	Publish

4	3.2 Reputation	3.2.1 Information	point 3	14	Clarification	The following minimum set of information from the supervised entity, the appointee, and/or the judicial/administrative authority concerning legal proceedings and criminal investigations is needed to conduct the assessment. Information are related to the following areas: <i>refusal of registration, authorisation, membership or licence to carry out a trade, business or profession; or the withdrawal, revocation or termination of registration, authorisation, membership or licence;</i>	To be clarified what "trade or business" should be considered and whether it should be assessed for a single deal or in general.	Wittschorek, Maren	Publish
5	3.2 Reputation	3.2.1 Information	point 4	15/16	Amendment	In our view this approach is too far reaching as administrative / civil proceedings and investigations are a broad field and do not necessarily allow the conclusion that the person can be made responsible. In addition it would be a huge administrative and unproportional burden for the institution to provide these information to the authorities (in particular as these information should already be available to them due to their supervisory review and evaluation process). Furthermore, in cases where the candidate comes from a competitor, the candidate would not be allowed to disclose internal information such as administrative and civil law proceedings / investigations towards the potential new institution.	Administrative and civil proceedings as well as pending criminal proceedings that have not yet been concluded should not be taken into account. Only relevant proceedings (in the fields of banking, insurance activities, investment services, securities markets, payment instruments, money laundering, ...) should be taken into account.	Wittschorek, Maren	Publish
6	3.2 Reputation	3.2.2 Assessment approach	3.2.2.	17	Amendment	It is suggested to define a specific timeframe to assess the relevance of any supervisory measure; more concretely: A) A longer timeframe (e.g. 10 years): Only for all the Procedures initiated against the candidate and all the Procedures regarding AML topics initiated against both the candidate and the company; B) A shorter timeframe (e.g. limited to 5 years prior to the application): Procedures initiated against the company (apart from AML topics as detailed above) . To be considered as potential obstacles: i) the candidate might not have access to detailed data from the past. In such case the scope of information that is available to the candidate and institution would be limited to what is publicly available on regulator's web site/register of fines. ii) the companies are not keen in revealing this data to a candidate, particularly if he/she was not involved in the matter personally and after he/she left the company; iii) companies are not at liberty to share this data due to banking and GDPR secrecy, especially if they do not belong to the same Group.	It is suggested to define a specific timeframe to assess the relevance of any proceedings and other facts.	Wittschorek, Maren	Publish
7	3.3 Conflicts of interest and independence of mind		lit (a)	22	Deletion	To avoid a subjective view on the matter, how can independence of mind (courage, resisting group-think) be evaluated? Can periodical behavioural evaluation need to be taken in consideration or is it necessary to set up an alternative measurement? Please, note that this info is not mirrored in the questionnaire.	To avoid a subjective view on the matter it is important to have a clarification to assess behavioural skills like "courage", "resist 'group-think'" etc. Since we see no possibility to assess such behaviour, we suggest to delete this requirement.	Wittschorek, Maren	Publish

8	3.5 Collective suitability of the management body		Diversity	39	Amendment	Institutions which have no influence on the composition of the management body in its supervisory function cannot ensure a level of diversity on experience or gender aspects that is different from what is predetermined by electoral outcomes, appointments or ex-officio members.	These particularities should be pointed out in the guide. The ECB should take into account national specificities.	Wittschorek, Maren	Publish
9	3.6 Assessment of individual accountability of board members			42	Clarification	<i>"It follows that a member of the management body who has or had a position in the institution at the time when facts underlying <u>certain</u> findings (e.g. ML, fraud, or other findings arising from on-site inspections or legal proceedings) occurred may be responsible for those findings even if there is no connection between their individual roles and responsibilities in the management body and the given findings."</i> The reference to 'certain' is too much vague both regarding to 'which supervisory inspection other than AML/CTF' as well as regarding the severity.	More details are needed to avoid too vague and all-encompassing concept about which findings to be mentioned.	Wittschorek, Maren	Publish
10	3.6 Assessment of individual accountability of board members	3.6.2 Findings		43	Clarification	The underlined wording of the following sentence " <i>Findings identified by a supervisor as recent, relevant and severe are taken into account when considering the individual accountability of an appointee</i> " is hard to understand, as the reference to 'recent' is unclear.	Reference to "findings identified by a supervisor <u>as recent</u> " brings about complexity and uncertainty.	Wittschorek, Maren	Publish
11	3.6 Assessment of individual accountability of board members	3.6.2 Findings		43	Amendment	The institutions are often not able to provide this information and the potential candidate would not be able to disclose this information to the new employer (see our comment on chapter 3.2.1. point 4, page 15/16 of the Draft).	Administrative and civil proceedings as well as pending criminal proceedings that have not yet been concluded should not be taken into account.	Wittschorek, Maren	Publish
12	3.6 Assessment of individual accountability of board members	3.6.4 Process		46	Clarification	Supervisory findings, if any, need to be assessed during the FAP, provided they are severe, relevant and recent. In case the findings refer to an entity different from the one for which the appointee's FAP is being carried out, it is not clear how the exchange of information on supervisory measures between the two different entities is expected to be managed, considering the sensitivity of the data and possible data secrecy limitations.	Potential non-compliance with data secrecy requirements.	Wittschorek, Maren	Publish
13		5.1.2 Changes of role		52	Clarification	It should be clarified in the event of a significant change of responsibilities within the management body in its executive function <u>no notification</u> is required. It should be only the task of the institution to check whether the member of the management body has sufficient experience and knowledge for the specific responsibilities (as all members have been subject to an FAP decision of ECB in the past). In addition, it should be presumed that the person has sufficient experience due to the fact that CRD V/IV and the supervisory authorities require a collective experience/knowledge as well.	It should be clarified in the event of a significant change of responsibilities within the management body in its executive function <u>no notification</u> is required.	Wittschorek, Maren	Publish

14		5.1.3 Renewals		53	Clarification	<p>It would be our understanding that in case of a renewal the appointee and the supervised entity only need to provide new facts or information if any. Such a new fact could be provided in an informal letter/e-mail. The submission of the complete questionnaire would be an unnecessary administrative burden. Especially with regard to the fact that the supervised entity and the respective person are obliged to inform the NCA about any new facts having relevance for the suitability throughout the duration of the mandate anyways.</p>	<p>It should be clarified that institutions can notify the authority via informal letters in case of a renewal.</p>	Wittschorek, Maren	Publish
15		5.3.3 Part 2: General guidance on whether or not a new fact may trigger a reassessment		60	Amendment	<p>The ECB wants to reassess the individual suitability of management bodies also in the case of individual poor performance. A reassessment is to be triggered by a "significant" or "persistent" poor performance, which can also be seen in a relevant omission (e.g. the prevention of violations). This clearly goes too far, contradicts the legal requirements and the character of the Guidelines as a "self-binding document". The criteria for poor performance are too vague. We see the danger here that every negative development could be taken as an opportunity to question the individual suitability in each case and in this respect build up a "threatening backdrop". A determined poor performance must, however, also be individually attributable. The principle of responsibility is only taken up in the current wording with regard to the lack of compliance with "warnings" or "expectations" of the competent authority. However, the principle of responsibility would have to apply overall to any bad performance and in particular to the case of relevant omissions. It is also disproportionate to automatically attach a judgement of poor performance to non-compliance with "warnings" or "expectations". In any case, it contradicts the prohibition of excessiveness. It is also unclear how the corresponding statements in section 5.3.3. relate to the statements in section 7.4, according to which non-compliance with an "obligation" should not automatically affect suitability.</p>	<p>We suggest deleting individual poor performance as a trigger for individual reassessment.</p>	Wittschorek, Maren	Publish

16		7.1 Notification of intended appointments	7.1	68	Amendment	<p>The draft guide provides an "invitation" for ex-ante notice only for members of the management body in its executive function. This restriction to executive board members is particularly important. A supervisory encouragement of ex-ante notifications for members of the management body in its supervisory function would be unfeasible to comply with for such public-law institutions, which - due to existing legal requirements - have practically no or only hardly influence on the recruitment process of members of the management body in its supervisory function. On the one hand, this is the case for ex-officio members, which are members by law e.g. because of their main occupation within the local public authority (e.g. mayor of the town / district) or state level. Further members are elected by the municipal trustees or appointed by public bodies or shareholders. Since these institutions cannot possibly know in advance which candidates will become new members on the supervisory board, they are not in a position to submit notifications before the election / appointment. In some member states (e.g. Germany) notifications of new members of the management body in its supervisory function must be carried out only after the appointment, which is necessary to take into account the structure of public-law institutions.</p> <p>Furthermore, ex ante Fit and Proper assessments could lead to significant problems difficult to solve in countries where lists of candidates should be presented by the shareholders. In this regard, the recent "Procedure for assessing the suitability of representatives of banks, financial intermediaries [...]" issued by the Bank of Italy have clearly defined the cases in which the assessment of representatives must be carried out before or after the appointment (including cases of shareholders' meeting appointments).</p>	National options should remain. In any case, limitation to executive members is important. We suggest to maintain the freedom of choice of the National Competent Authorities on this point.	Wittschorek, Maren	Publish
17		7.1 Notification of intended appointments	7.1	68	Deletion	<p>The ECB invites institutions to submit a fit and proper questionnaire and a curriculum vitae to the competent authorities <u>prior</u> to the intended appointment of a member as soon as there is a clear intention to appoint. According to footnote 90, this is the case, for example, when the competent body or committee of the institution has taken a decision to this effect, even if this decision depends on the approval of other bodies or the feedback of the competent authorities.</p> <p>In our opinion, it is contrary to the division of tasks between the committee and the competent body that the committee's positioning already has an external effect. The committee merely prepares the decision of the competent body, so that an intention can only exist when the competent body has decided accordingly.</p>	We request the deletion of footnote 90.	Wittschorek, Maren	Publish
18		7.1 Notification of intended appointments	7.1	69	Clarification	How to deal with fragmentation between local and supervisory authorities mainly to guarantee timely response and organize the activities internally?	To guarantee timely response and organize the activities internally a clarification on how to deal with fragmentation is welcome.	Wittschorek, Maren	Publish

19		7.2 Types of decision	7.2	69-70	Clarification	A formal ECB decision is taken after every FAP by the deadline provided for in national laws, if applicable. Without prejudice to any deadline set out in national law, the joint ESMA and EBA Guidelines on suitability provide that the time taken to adopt a decision should not exceed 4 months from the application date. In this respect, it is suggested a harmonization of the timeframe for all the jurisdictions in scope, in order to ensure certainty of the maximum duration of the FAP process.	To provide a certain maximum timeframe for the adoption of the decision, with full harmonization within the jurisdictions in scope, by aligning the national laws in this respect, which would support the proper planning of managerial changes.	Wittschorek, Maren	Publish
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Template for comments

Fit and proper Questionnaire

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant section/question/page, where appropriate;
- you indicate under "Type of comment" whether your comment is a proposed amendment, clarification or deletion.

Deadline: Midnight of 2 August 2021

ID	Section	Question	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Declaration by the supervised entity		Page 3 Bullet 5	Amendment	Please amend as follows: "Declaration by the supervised entity ...confirms that the supervised entity believes, on the basis of due and diligent enquiry <u>provided by the candidate</u> and by reference to the fit and proper criteria as laid down in [national and European law, international standards, including regulations, codes of practice, guidance notes, guidelines and any other rules or directives issued by the [NCA] or by the ECB and the European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA), that the appointee is a fit and proper person to perform the function as described in this questionnaire"	Supervised entity must be allowed to rely on the information provided by the candidate - a due and diligent enquiry is not required by the supervised entity itself.	Wittschorek, Maren	Publish
2	1. Identity of the supervised entity and appointee	E.Grounds to suspect money laundering or terrorist financing Are you aware or have you been informed by the supervised entity of any reasonable grounds to suspect that money laundering or terrorist financing is being or has been committed or attempted, or whether there is any increased risk thereof in connection with the supervised entity or its group?	7	Deletion	This question seems to be not appropriate, as the questionnaire assesses the fit&properness of the candidate and not the supervised entity. We suggest to delete the question on awareness or information (received) by the supervisory entity of grounds to suspect money laundering or terrorist financing etc. in connection with the supervised entity or its group.	The appointee is not yet in function at the supervised entity when filling the questionnaire, so we deem this question is not appropriate in the fit and proper process.	Wittschorek, Maren	Publish
3	2. Function for which the questionnaire is submitted	Is the application for a renewal of an appointment?	8	Deletion	It would be our understanding that in case of a renewal the appointee and the supervised entity only need to provide new facts or information if any. Such a new fact could be provided in an informal letter/e-mail. The submission of the complete questionnaire would be an unnecessary administrative burden. Especially with regard to the fact that the supervised entity and the respective person are obliged to inform the NCA about any new facts having relevance for the suitability throughout the duration of the mandate anyways. Therefore this question should be deleted.	We suggest to delete the question because an informal information about the renewal should be sufficient.	Wittschorek, Maren	Publish

4	2. Function for which the questionnaire is submitted	(planned) end date of the term of office	9	Amendment	In alternative to a specific date it should be possible to identify an event such as the approval of the financial statements.	The amendment is intended for those companies that do not set a specific calendar date but an event that is not yet calendarized.	Wittschorek, Maren	Publish
5	3. Experience	B. Practical experience related to banking and/or the financial sector gained in the last ten years -- Degree of seniority of the position / hierarchical level	10	Clarification	A clarification is requested whether the degree of seniority is a self-assessment made by the candidate / appointee or if there is a reference benchmark.	Request for clarification that would provide more accurate guidance to the supervised entity.	Wittschorek, Maren	Publish
6	3. Experience	Number of subordinates	10	Clarification	A clarification whether also indirect subordinates are to be taken in consideration or only first reporting lines would provide helpful guidance on the correct perimeter to be taken in consideration for the calculation.	Request for clarification that would provide more accurate guidance to the supervised entity.	Wittschorek, Maren	Publish
7	4. Reputation	A-I (in particular A, B, E)	15-18	Amendment	<i>"throughout section 4 "you" means "the appointee personally" and also includes all corporate entities, partnerships or unincorporated entities with which the appointee is or has been associated as a board member, key function holder, senior manager, owner, partner, associate, or qualifying shareholder."</i> This should be limited to the appointee personally as this information can only be provided in relation to the specific person.	We suggest limitation to the appointee personally.	Wittschorek, Maren	Publish
8	4. Reputation	A. ii. Specify what you did to prevent and/or avoid the wrongdoing	16	Clarification	Proposal for two questions instead of one under ii). First: Were you a member of the management body at the time of the alleged wrongdoing? Second: Are you or have you been a key function holder or a senior manager that is or was responsible for a division or business line to which the proceedings relate at the time of the alleged wrongdoing? Key function holders and Senior Managers are not jointly responsible. <u>A punctual definition of "senior manager" and "associate", as well as "alleged wrongdoing" would be welcome.</u>	Request for clarification that would provide more accurate guidance to the supervised entity.	Wittschorek, Maren	Publish
9	4. Reputation	A ii. Specify what you did to prevent and/or avoid the wrongdoing	16	Clarification	Proposal for two questions instead of one under ii). First: Were you a member of the management body at the time of the alleged wrongdoing? Second: Are you or have you been a key function holder or a senior manager that is or was responsible for a division or business line to which the proceedings relate at the time of the alleged wrongdoing? Key function holders and Senior Managers are not jointly responsible. <u>Please clarify, that - besides members of the Management body - only key function holders or senior managers that are or were responsible for a division or business line to which the proceedings relate are addressed.</u>	Request for clarification that would provide more accurate guidance to the supervised entity.	Wittschorek, Maren	Publish
10	6. Time commitment	B Assessment by the appointee regarding his/her time commitment for the functions	24	Amendment	It would be more appropriate for such assessment to be conducted by the supervised entity instead and not by the appointee.	The proposed amendment would enable to provide a more accurate calculation the required time since the supervised entity is in a better position to calculate the necessary the time commitment rather than the candidate/appointee.	Wittschorek, Maren	Publish
11	8. Additional information and annexes	B. Please upload (if applicable) the following accompanying documents	29	Clarification	Please clarify, what is meant by "suitability reports".	Request for clarification that would provide more accurate guidance to the supervised entity.	Wittschorek, Maren	Publish
12	8. Additional information and annexes	B. Please upload (if applicable) the following accompanying documents	29	Deletion	Please delete "Draft" Board minutes or minutes of the Nomination Committee . Draft versions are not legally binding	Delete "draft" is needed as the draft version are not legally binding	Wittschorek, Maren	Publish

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