

Template for comments

Public consultation on the Guide to on-site inspections and internal models investigations

Please enter all your feedback in this list.

When entering your feedback, please make sure:

- that each comment only deals with a single issue;
- to indicate the relevant article/chapter/paragraph, where appropriate;
- to indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 15 September 2017

ID	Chapter	Paragraph	Page	Type of comment	Detailed comment	Concise statement why your comment should be taken on board	Name of commenter	Personal data
1		3,iii)	2		We propose that the sentence “and (iii) other legal entities which are within the scope of inspections because they have a business relationship with the supervised entity” is replaced with “and (iii) other legal entities belonging to the banking group of the supervised entity which are within the scope of inspections because they have a business relationship with the supervised entity”.	The “business relationship” concept is too wide and there is a risk that companies inspected by the ECB are not included in the banking group	[REDACTED]	Don't publish
2		2.2.1	10		If the inspection is conducted on a group of credit institutions, the notification should be sent not only to the parent company, but also to the subsidiaries concerned with the upcoming inspection.	This would ensure at least simultaneous information to both the mother bank and the subsidiary.	[REDACTED]	Don't publish
3		3.4	24		When there are legal entities included for the purposes of prudential supervision in the Banking group of a “supervised group”, but these entities are not directly or indirectly controlled by the “supervised group” parent company (e.g. Joint Ventures), the language can be different from the one chosen by the “supervised group” parent company.	In our example (i.e. Joint Ventures), the decision of the banking group about the official language should not impede the legal entity the possibility to use its own national language, as there is not a control exercised by the mother bank on the legal entity' business.	[REDACTED]	Don't publish