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**FINAL**

## **Instructions for supervised entities providing evidence of actions taken to address measures notified through the IMAS portal**

### **1. Introduction**

This document provides instructions on how to report on the actions taken to address measures previously notified to the supervised entity by the Joint Supervisory Team (JST) through the IMAS portal.

### **2. Processes and messages in the IMAS portal**

All supervisory measures shared by the JSTs are visible in the IMAS portal as dedicated processes.

When a measure is shared by the JST, the supervised entity receives a message with the title “Supervisory measure” (SM), which includes the relevant information about the measure:

- type of measure, i.e. whether it is an obligation, a recommendation, a condition or a reminder to comply with the supervisory requirements;
- severity of the measure, i.e. the criticality of the measure, which can range from M1 (minimum severity) to M4 (maximum severity);
- measure ID;
- measure label, i.e. a short summary of the measure;
- description of the measure, which is also included in the ECB’s decision or operational act;
- communicated deadline, which can be left blank for conditions or limitations (conditions imposed by ECB decisions make the effectiveness of the decision dependent on specific events – by design the measures have no specified deadline);
- finding IDs and finding labels, i.e. short summaries of the findings addressed by the measure;

- supervisory activity ID, referencing the supervisory activity the measure derives from; this ID can be used in the “My Processes” tab to group measures that originate from the same supervisory activity.

A copy of the supervisory act through which the supervised entity has been notified of the measure is also provided as an attachment, along with any additional documents (e.g. annexes).

A new process is opened in the IMAS portal for each measure shared by the JST. The **process types**, reflecting the possible combinations of supervisory activity and type of measure, are as follows:

- SM obligation – Internal models
- SM recommendation – Internal models
- SM condition – Internal models
- SM reminder to comply – Internal models
- SM limitation – Internal models
- SM reminder to comply – Internal models
- SM reminder to address – Internal models
- SM obligation
- SM recommendation
- SM reminder to address
- SM obligation – On-site inspection
- SM recommendation – On-site inspection
- SM reminder to address – On-site inspection
- SM condition – Ongoing models
- SM obligation – Ongoing models
- SM recommendation – Ongoing models
- SM reminder to comply – Ongoing models
- SM limitation – Ongoing models
- SM reminder to address – Ongoing models
- SM condition – Authorisation

- SM obligation – Authorisation
- SM recommendation – Authorisation
- SM reminder to address – Authorisation
- SM condition – Fit and proper
- SM obligation – Fit and proper
- SM recommendation – Fit and proper
- SM – Early intervention assessment

Type	ID	Supervisory activity ID	Last modified	Status	Target institution	Due date	# Messages
SM condition - Internal models	M-1-IMIC-2024-766384190	IMI-2024-FIAAA-1321709235	03 Dec 2024	Submitted	bank_01	Not available	2
SM condition - Internal models	M-3-IMIC-2024-726268481	IMI-2024-FIAAA-1319115981	28 Nov 2024	Open	bank_03	30 Sep 2024	2
SM obligation - Internal models	M-3-IMIO-2024-726268478	IMI-2024-FIAAA-1319115981	28 Nov 2024	Open	bank_03	31 Oct 2024	2

The processes are listed in the “My Processes” tab in the IMAS portal. The “Supervisory activity ID” column can be used to filter all measures related to the same supervisory activity. This view can be extracted by clicking on the “Export as CSV” button. The “Due date” indicates the communicated deadline of the measure and can be applied to filter and/or change the order of the processes.

The supervised entity is notified of any change in the status of the process in a *process status update* message. The different statuses should be understood as follows.

- “Open” means that the measure has been shared by the JST and that the process is still open.
- “On hold” means that the JST has put the measure on hold (typically because a follow-up investigation is required before the measure can be closed).
- “Completed” means that the JST has assessed the measure as fulfilled. A message is sent to the supervised entity whenever the process status of a measure changes to “Completed”.
- “Cancelled” means that the supervisory measure has been cancelled by the JST. Cancelled processes are also shown alongside completed processes in the dashboard “Closed”.

For the “Open” and “On hold” statuses, the following messages can be exchanged.

- *Measure implementation reports* are sent by the supervised entity in response to the supervisory measure message to report completion or progress and to provide evidence and documentation of the actions taken to address the measure. If these actions have not yet been implemented, an estimated date of implementation may be provided so that the JST is aware of the status. Once the actions to address the measure have been fully implemented, the measure implementation report can be updated using the “Update existing” option within the process, allowing the supervised entity to resubmit the initial message with amended or additional information. Note that the submission of a measure implementation report does not change the status of the process, as this can only be done by the JST following an assessment.
- *Measure implementation confirmation* messages are sent by the supervised entity in response to either a reminder to comply or a reminder to address supervisory measures, in order to confirm the implementation of the measure. This message does not allow the supervised entity to include any explanation or supporting documentation. Upon submission of the message, the process status is automatically set to “Completed”.
- *Information messages* can be sent in both directions by the JST and the supervised entity – these are one-way messages with no option to reply. There is, however, an option to create a separate information message as a response, linked to the same supervisory measure. Note that an information message is also sent to the supervised entity in the following cases:
  - when the measure’s deadline is changed by the JST (Subject: “Measure deadline update message”);
  - when the deadline has expired, and no measure implementation report has been submitted to the JST (Subject: “Deadline has been reached”).
- *Request for information* messages can be used by the JST to request information from the supervised entity, which is expected to respond with an information message.

All the messages related to a particular process can be viewed, based on user permissions, by opening the process in the “My Processes” tab. They can also be viewed individually in the “All Messages” tab. Here, the “Status” column can take the following values, depending on the status of the message: “Received”, “Submitted”, “Draft” or “Pending Confirmation” (until the message has been processed by the system, when it is changed to “Submitted”).

## Notifications

When supervisory measure processes are initiated by a JST, the IMAS portal users of the relevant supervised entity are notified through an email which includes the *Process ID* and *Supervisory activity ID*. It should be noted that this only happens if they have **access** to the supervisory measure process category for the specific supervised entity (head of group or subsidiary) at that point in time. The Delegated Access Administrator (DAA) must previously grant access to the users in charge of this process category through the “Manage Users” page in the IMAS portal.

The process types listed above are divided into the following **categories**, based on the supervisory activity:

- Supervisory measures – Authorisations (*covering authorisation measures*)
- Supervisory measures – Fit and proper (*covering fit and proper measures*)
- Supervisory measures – Internal models (*covering internal models and ongoing monitoring measures*)
- Supervisory measures – Other measures (*covering on-site inspections, ongoing supervision, the Supervisory Review and Evaluation Process and other measures*)

For each of these categories, the **DAAs** can activate the “Can share processes” functionality for each user. This functionality allows them to appoint *measures administrators*.

These **measures administrators** will receive all email notifications related to the measures belonging to the category (e.g. “Supervisory measures – Internal models”) and the specific supervised entities (head of group and/or subsidiary) to which they are assigned. The measures administrators receive an email notifying them that a new supervisory measure process has been created (Subject “New ‘Supervisory measure’ message for IMAS Portal process ‘*Process ID*’”). As soon as they receive this email, they will be able to open the process in the IMAS portal and assign it to a specific *responsible user* (who should already be an IMAS portal user) using the “Share this process” functionality.

The **responsible users** will then receive an email informing them that the process has been shared with them. From that moment onwards they will be able to access the specific process and will receive all related email notifications. This ensures that users working on the measures will only receive emails relating to measures they are responsible for. Access can be revoked by the administrator of the measure where necessary.