

## **Template for comments**

ECB Guide on effective risk data aggregation and risk reporting

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## **General comments**

Paragraph 3.5 "Group-wide data quality management and standards" highlights the importance of ensuring coherence among front office systems and reporting layer, as well as periodical reconciliations with other sources and reports.

Could you elaborate on recommended reconciliation typologies and frequencies? Are there minimum expectations in place to ensure compliance in case of on-site inspections? For instance:

- Are there reconciliations of paramount importance that can be considered mandatory? Maybe Front Office Systems vs. General Ledger, General Ledger Accounts vs. Balance Sheet, or Balance Sheet vs. FINREP?
- Is there a minimum frequency that can be deemed as sufficient? For instance Balance Sheet vs. FINREP may be performed quarterly, whilst Front Office Systems vs. General Ledger should be daily?

We think that these few additional information regarding implementing aspects may be helpful in order to fully address the requirements in scope properly.

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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/ section/ paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion; and
- you include a rewording suggestion in case of a proposed amendment.

Deadline: 6 October, 2023

I	D	Chapter/ section	Sub-point/ bullet/ paragraph	IPade	Type of comment	Detailed comment	 Name of commenter	Personal data
	1							Publish