EUROPEAN CENTRAL BANK

BANKING SUPERVISION

Data Quality Escalation Process

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Overview

1 Introduction

2 Rationale

3 Data quality issues

4 Underlying legal acts, guidelines and best practices

5 Escalation Process

6 Escalation Process in practice

7 Future activities

Escalation Process: what is it?

The Escalation Process **constitutes one workflow within the overall framework for data monitoring and quality assessments** that is set up jointly by the ECB's Banking Supervision Data Division (DG-S/SUP) alongside counterparts in the SSM (MSI, MSII, MSIV) as **part of its responsibilities** for **managing the supervisory data** of **significant institutions** (banks) under SSM supervision

Overview

1 Introduction

2 Rationale

3 Data quality issues

4 Underlying legal acts

5 Escalation Process

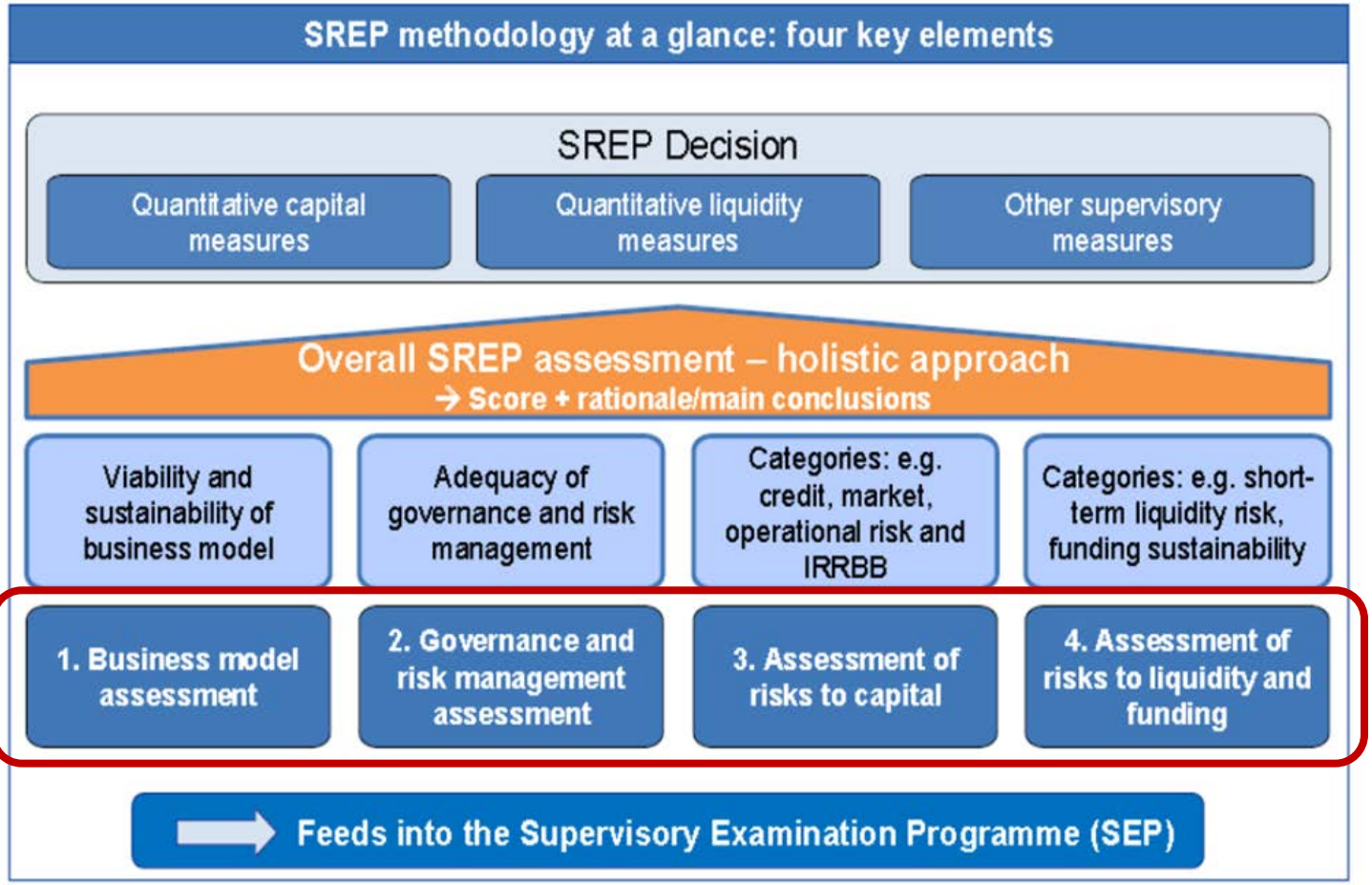
6 Details of each step

7 Future activities

Escalation Process: why do we need it?

Data quality is **one important element** for the Supervisory Reporting and Evaluation Process (SREP) and important generally for **all supervisory tasks**

Four key elements in the SREP



Supervisory data collected by DG-S/SUP is used for:

- Ongoing risk assessments in **each of the three phases** in **each of the four key elements of the SREP**

Phase 1: Data gathering
Phase 2: Automated anchoring score
Phase 3: Supervisory judgement

Main sources: quarterly ITS reports, ad hoc reports

- Within Element 2, **data quality issues** are analysed in category iii

(i) Internal governance framework,
(ii) Risk management framework and risk culture
(iii) Risk infrastructure, internal data and reporting
(iv) Remuneration policies and practices

2. Rationale (cont.)

Hence, it is crucial that banks submit supervisory reports **of consistently suitable quality in a timely manner** to enable aforementioned SSM activities to be reliably undertaken

However, **current data quality monitoring and assessment methods** are deemed **not sufficiently authoritative** to enable these data quality issues to be adequately resolved

Consequently → **developed Escalation Process**

Overview

1 Introduction

2 Rationale

3 Data quality issues

4 Underlying legal acts

5 Escalation Process

6 Details of each step

7 Future activities

Regular ECB-NCA data monitoring and quality assessments

- **Automatic feedback** (Acknowledgement Files) ⟶ real-time
- **Production Summary Reports** ⟶ day after remittance date
- **Quarterly Reports on all outstanding issues** ⟶ per quarter
- **Quarterly Data Quality Assessment Reports** ⟶ per quarter

3. Data quality issues: how flagged?

Data quality issues flagged through other channels:

Specific Thematic Analyses

- e.g. on Pillar 2, Operational Risk, Group Structures…

Other ECB Business Areas

- e.g. for DG-Market Operations for Counterparty Framework; or for generation of SSM Bank ID Cards…

European Banking Authority (EBA)

- e.g. quarterly quality assessments; or Annual EBA Transparency Exercise…

Supervisory Data Issues Tracker

- Request management tool for SSM since December 2015
- JSTs raise questions on data (quality) issues

3. Data quality issues: interactions with NCAs

Communication and interactions with NCAs is very frequent

- *Inter alia* Mail correspondence, Structured reports, SUBA discussions, Phone
- Issues discussed in fora, e.g. Task Force on Expert Group on Data Quality (EGDQ) and WGSUP

- **However persistent cases of**
  - Delayed reporting *(Punctuality)*
  - Missing, incomplete, inaccurate data *(Accuracy and Completeness)*

- **And issues remain of**
  - Non- or partial response
  - Inadequate explanations
  - Perceived lack of commitment / planned action

Consequently, over the last 18 months, experts and Management in **DG-S/SUP, DGMSI, DGMSII** and **DGMSIV** discussed and developed together the Escalation Process

Overview

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2 Rationale

3 Data quality issues

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5 Escalation Process modalities

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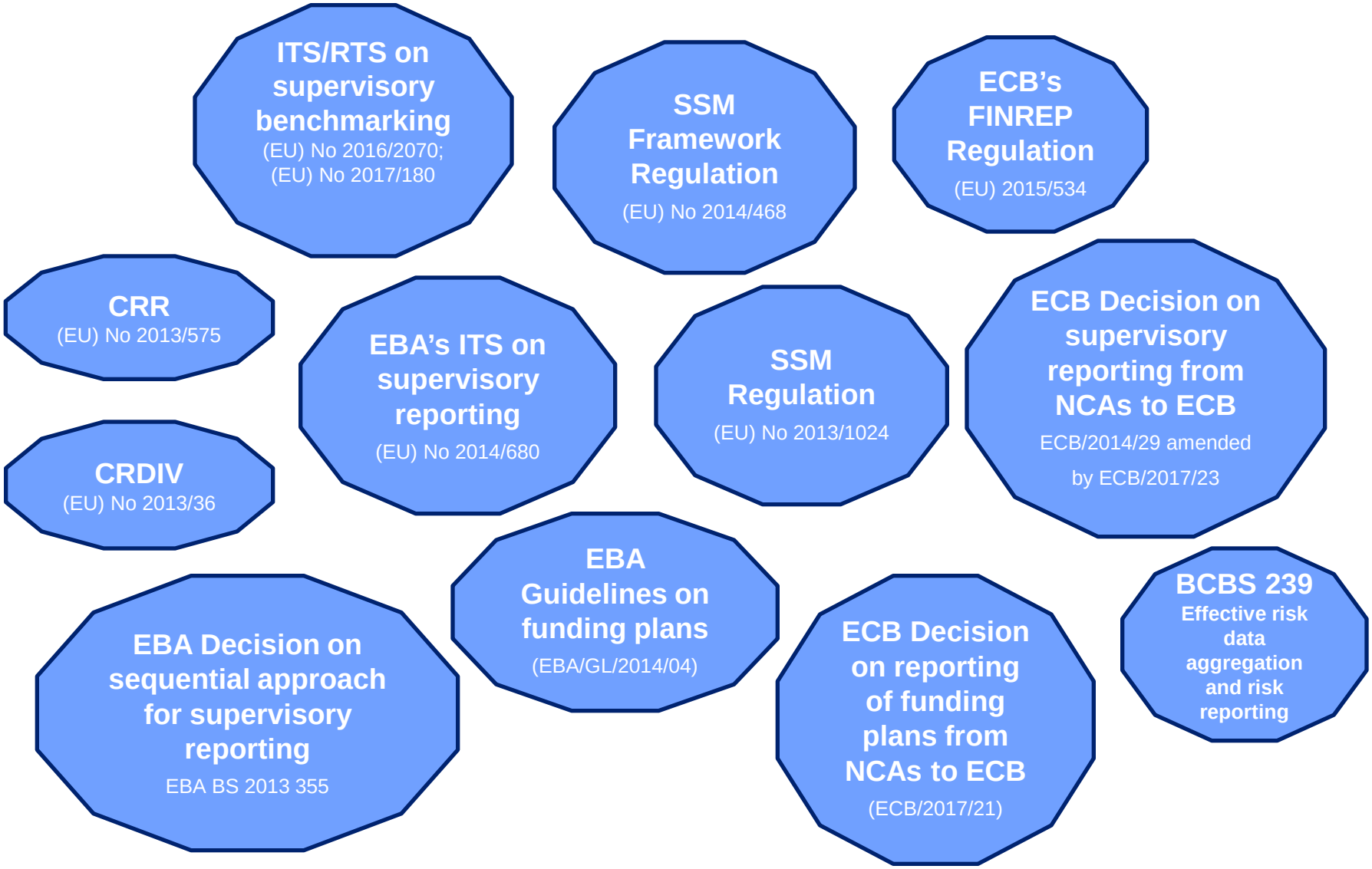
7 Future activities

Guidance underpinning supervisory reporting



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2 Rationale

3 Data quality issues

4 Underlying legal acts, guidelines and best practices

5 Escalation Process

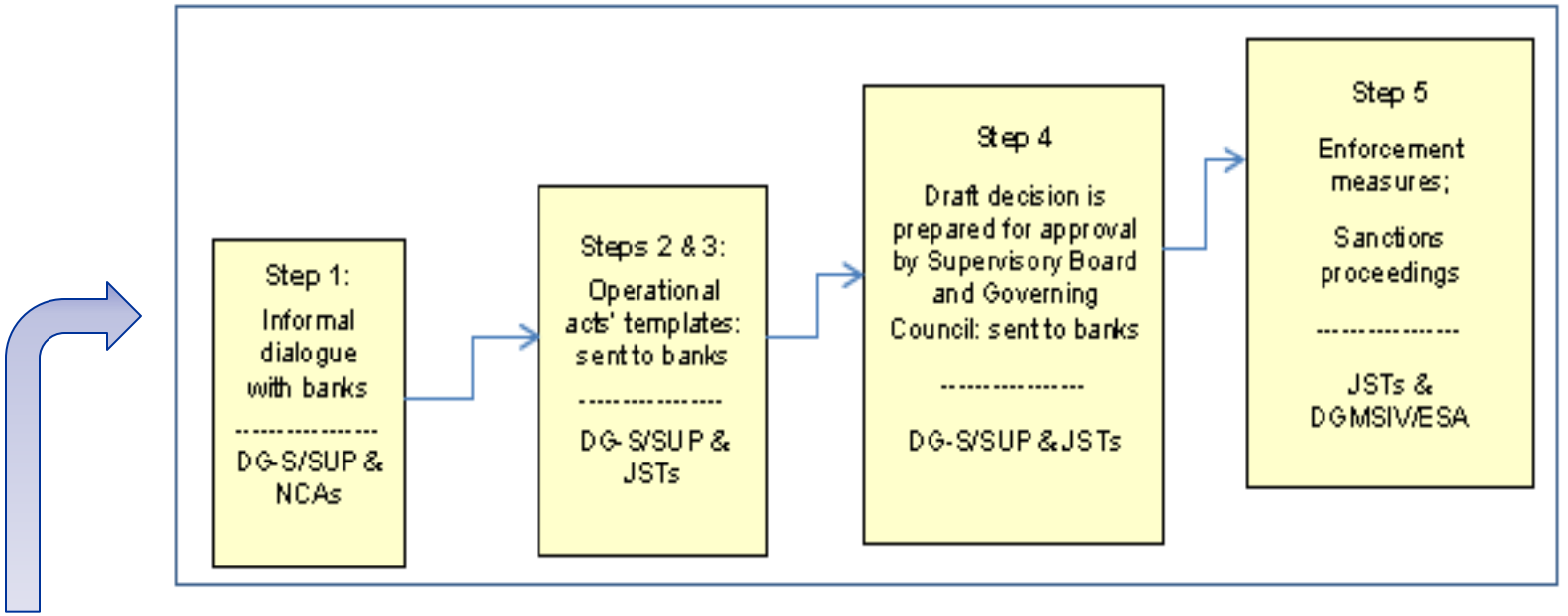
6 Escalation Process in practice

7 Future activities

Scope and method:

- **Significant** supervised banks at **highest** level of consolidation
- **Quarterly** reports of supervisory data
- Three **quality dimensions** of:
  - Punctuality
  - Accuracy
  - Completeness
- **Expert Judgement** alongside quantitative findings

Steps of the Escalation Process



Preparation phase (before Step 1):

- Extensive communication with NCAs
- Notification that specific banks fall under scope of **a potential initiation of Escalation Process**
- Clarification of issues and defined course of action for specific bank(s)

Step 1: Informal dialogue

- Informal and continuous exchange via NCAs
- Request for explicit clarifications, submissions, corrections
- Banks warned of possible escalation

If banks:

- Do not respond,
- Do not provide adequate explanations
- Do not submit missing or corrected data within specified deadlines
- Do not adequately plan for remedial measures

Escalate to next step

Step 2: Operational act

- Formal letter drafted by DG-S/SUP as a binding operational act
- Attach Individual Bank Data Quality Dashboard
- Include details of unresolved data quality issues / dialogue & actions of bank
- JST is consulted
- Bank is requested *inter alia* for details on its plan to:
  - Increase the quality of the submitted data
  - Specify a timeline to remedy the issues
- Letter is signed by Head of Section of DG-S/SUP
- Sent directly to bank's Senior Management (e.g. Chief Risk Officer)

If banks do not react appropriately to a Step 2 letter

Escalate to next step

Step 3: Operational act

- Formal letter drafted by DG-S/SUP as a binding operational act
- Similar content to Step 2 letter
- **Aim is to emphasise to bank that case is now escalated further**
- Letter is signed by Head of Division of DG-S/SUP
- Sent directly to bank's highest authority (i.e. Chief Executive Officer)

If banks do not react appropriately to a Step 3 letter

Escalate to next step

Step 4: ECB Supervisory Decision

- The Decision is drafted by DG-S/SUP
- The Decision is a legally binding act
- JST is consulted
- May refer to other relevant breaches
- Approved by Supervisory Board and Governing Council
- *Enforcement and Sanctions Division of SSM (DGMSIV/ESA) informed*
- Bank is formally issued with Decision

If banks do not react appropriately to a Step 4 Decision

Escalate to next step

Step 5: Referral to Enforcement and Sanctions (DGMSIV/ESA)

If inadequate or no reaction from bank to the Decision in Step 4, or if data quality issue meets the Supervisory Board Guidance for referrals, then

- DG-S/SUP and JST **take final step** in the Data Quality Escalation Process

  → Jointly **refer the case to ESA**

- ESA (supported by JST) **decide** whether to:
  - Initiate enforcement procedures
  - Impose administrative pecuniary penalties
  - Open sanctions proceedings

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Operational from reference period of 2016Q4

For reference period of **2017Q1,** timeline/activities for **Preparation Phase** was:

- Mid-July: review of quality of SI H data up to 2017Q1
- 25-July: 8 NCAs asked to explain issues for 16 banks
- 25-July to 1-Aug:
  - 8 banks: confirmed punctuality issues due to NCAs
  - 1 bank: sent correction
  - 2 banks: confirmed issue is linked to pending EBA questions+answers
  - 2 banks: confirmed one-off issues; have defined action plans
- Aug-Sep:
  - *ECB communicated repeatedly with 2 NCAs (3 banks)*
  - 2 banks: sent corrections
- End-Sep:
  - 1 bank: ECB provided final guidance; awaiting corrections

Escalation Process was not initiated

Type of response expected from NCAs (and banks)

1. Timely and regular contact, also while issue is under investigation

2. **Clear and detailed explanation** of:

- **Which organisation** (bank or NCA) “caused” the delay and why (Punctuality)
- **Why checks are failing** (Accuracy, Completeness)
- **Which actions** the bank is taking with timeframes

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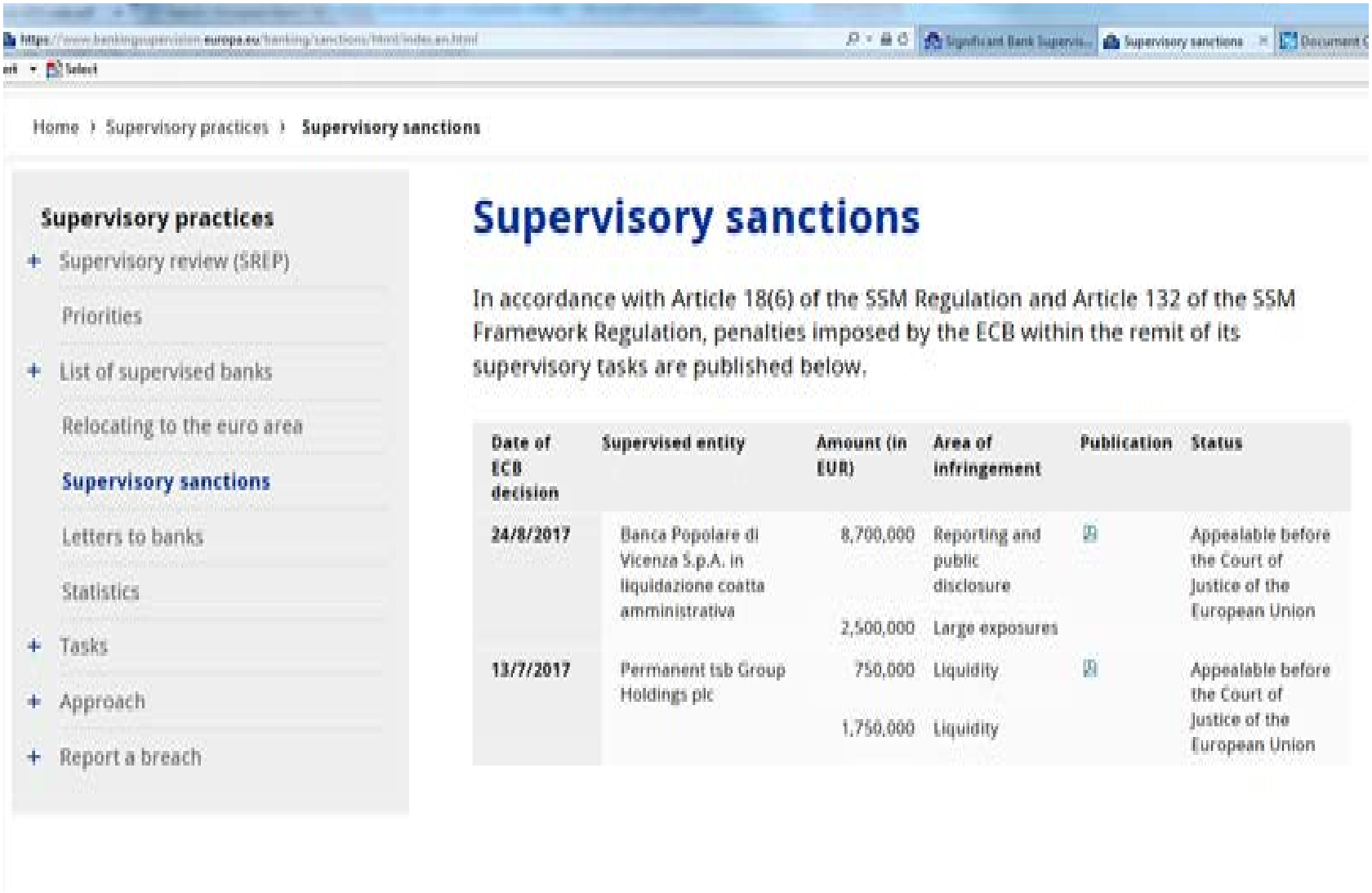
Work-in-progress

- To refine **documentation-management** of all correspondence
- To establish **visualisation tools**
- To further **fine-tune timelines** in the “Preparation Phase”

Thank you

Questions or observations

Annex



Home › Supervisory practices › **Supervisory sanctions**

Supervisory practices

- \+ Supervisory review (SREP)
- Priorities
- \+ List of supervised banks
- Relocating to the euro area
- **Supervisory sanctions**
- Letters to banks
- Statistics
- \+ Tasks
- \+ Approach
- \+ Report a breach

Supervisory sanctions

In accordance with Article 18(6) of the SSM Regulation and Article 132 of the SSM Framework Regulation, penalties imposed by the ECB within the remit of its supervisory tasks are published below.

Date of ECB decision	Supervised entity	Amount (in EUR)	Area of infringement	Publication	Status
24/8/2017	Banca Popolare di Vicenza S.p.A. in liquidazione coatta amministrativa	8,700,000	Reporting and public disclosure		Appealable before the Court of Justice of the European Union
		2,500,000	Large exposures		
13/7/2017	Permanent tsb Group Holdings plc	750,000	Liquidity		Appealable before the Court of Justice of the European Union
		1,750,000	Liquidity		

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