Feedback to EBA from Financial Conduct Authority (UK)

Validation rules

Documents referenced in this table are sourced from the following website:

<http://www.eba.europa.eu/regulation-and-policy/supervisory-reporting/implementing-technical-standard-on-supervisory-reporting-data-point-model-/-/regulatory-activity/press-release>

References to DPM mean the “DPM table layout and data point categorisation” document

References to Annexes mean the template annexes for own funds, FINREP (IFRS) and FINREP (GAAP)

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| Rule | Formula | Comment | Classification |
| V0219\_m | {C 03.00, r020,c010} = {C 01.00, r020,c010} - {C 02.00, r010,c010} \* 4.5% | 1. This rule would be better expressed with parentheses around RWA figure, so it reads as follows:

{C3.00, r020, c010}={C1.00, r020, c010}-({C2.00, r010, c010}\*4.5%)1. How will this rule be applied if the NCA adopts transitional arrangements?
 | 1. Suggested rule improvement
2. Query
 |
| V0221\_m | {C 03.00, r040,c010} = {C 01.00, r015,c010} - {C 02.00, r010,c010} \* 6% | 1. This rule would be better expressed with parentheses around RWA figure, so it reads as follows:

{C3.00, r040, c010}={C1.00, r015, c010}-({C2.00, r010, c010}\*6%)1. How will this rule be applied if the NCA adopts transitional arrangements?
 | 1. Suggested rule improvement
2. Query
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| V0223\_m | {C 03.00, r060,c010} = {C 01.00, r010,c010} - {C 02.00, r010,c010} \* 8% | 1. This rule would be better expressed with parentheses around RWA figure, so it reads as follows:

{C3.00, r060, c010}={C1.00, r010, c010}-({C2.00, r010, c010}\*8%)1. How will this rule be applied if the NCA adopts transitional arrangements?
 | 1. Suggested rule improvement
2. Query
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| V0254\_m | {r100,c010} = {r110,c010} + {r140,c010} + {r430,c010} | This rule is duplicated by the wider scope of v0264\_m | Validation error |
| V0264\_m | {r100} = {r110} + {r140} + {r430} | We have noted that there is no r110 for c020 and c030. Should these columns have a separate rule to c010? | Query |
| V0510\_m | {c380} = {c370} | All rows apart from 010 and 020 are greyed out for columns 370 and 380. If the figures have to be the same in both columns, we question the purpose of having them both. Is this rule correct/required? | Query |
| v0534\_m | {c450} = {c440} | All rows apart from 010 and 020 are greyed out for columns 440 and 450. If the figures have to be the same in both columns, we question the purpose of having them both. Is this rule correct/required? | Query |
| v0573\_m | {r260,c050} \* 0 = {r260,c060} | This rule requires that {C18.00, r260, c060} is zero. Is this correct? If so, what is the purpose of collecting this? | Query |
| v0774\_m | {F 01.02, r260,c010} >= {C 01.00, r330,c010} + {C 01.00, r360,c010} + {C 01.00, r410,c010} + {C 01.00, r490,c010} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
| v0779\_m | {r090} = {r100} + {r110} + {r120} + {r130} + {r140} + {r150} + {r160} + {r170} + {r180} | These fields give the total for r095, not r090 | Validation error |
| v0781\_m | {F 01.03, r040,c010} >= {C 01.00, r060} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
| v0782\_m | abs({F 01.03, r090,c010}) > abs({C 01.00, r180,c010}) | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
| V0889\_m | {c070} = {c010} + {c020} + {c030} + {c040} + {c050} + {c060} | None of these columns are labelled with a (-) to indicate negative entries, but some are labelled as decreases and others labelled as increases. The validation rule simply adds all the entered values.1. Should the decreases be entered as negatives?
2. Should the column headings include (-) signs?
 | Query |
| V1018\_m | {F30.01, c050} | In the DPM, this column heading refers to “reporting entity”. In Annex III, it is “reporting institution”. These should be made consistent | DPM error |
| V1031\_m | sum({F 31.01, r130, (c010-050)}) <= xsum(ABS({F 07.00,(r090-110, r150-180, c080-104)})) + {F 43.00, r070,c050} | In Annex III, above columns 010 to 050 on F31.01 are the words “outstanding balances”. This does not appear in the DPM. Please confirm that these **are** outstanding balance figures and not the amounts paid and received during the period. | Query |
| V1061\_m | {r210} = {r040} + {r100} + {r110} + {r120} + {r130} + {r170} + {r180} + {r190} | R090 is greyed out in the Annexes but is not in the DPM.1. Which is correct?
2. If the DPM is correct, should r090 be included in the calculation of r210?
 | Query |
| V1086\_m | {F 04.05, r010,c010} <= sum({F 01.01, c010, (r080-090, r120-130, r160-170, r180, r210)}) | As it stands we believe this validation is pointless. We believe it should be {F4.05, r010, **c030**} <= sum({F 01.01, c010, (r080-090, r120-130, r160-170, r180, r210)}) | Validation error |
| V1091\_m | {F 13.03, r010,c010} <= sum({F 01.01, c010, (r070-080, r110-120, r150-160, r190, r220)}) | What is the purpose of this rule? | Query |
| V1092 | {F 13.03, r010,c010} <= sum({F 01.01, c010, (r010, r060, r090, r130, r170, r200, r230-250, r290, r320-330, r360)}) | What is the purpose of this rule? | Query |
| V1241\_m | {c110} <= 1 | Will the taxonomy see a percentage entry as a decimal value less than one, or as a whole value less than 100? | Query |
| V1242\_m | {c120} <= 1 | Will the taxonomy see a percentage entry as a decimal value less than one, or as a whole value less than 100? | Query |
| V1243\_m | {c060} <= 1 | Will the taxonomy see a percentage entry as a decimal value less than one, or as a whole value less than 100? | Query |
| V1297\_m | sum({F 20.01, r260, (c010-020)}) = {F 01.01, r260,c010} | In the DPM, R260 on F1.01 does not match up with r260 of F20.01 | Validation error / DPM error |
| V1298\_m | sum({F 20.01, r270, (c010-020)}) = {F 01.01, r270,c010} | In the DPM, R270 on F1.01 does not match up with r260 of F20.01 | Validation error / DPM error |
| V1299\_m | sum({F 20.01, r280, (c010-020)}) = {F 01.01, r300,c010} | In the DPM, R280 on F1.01 does not match up with r3000 of F20.01 | Validation error / DPM error |
| V1627\_m | {r200} = {r210} | Should be {r200} >= {r210} | Validation error |
| V1628\_m | {r340} = {r350} | Should be {r340} >= {r350} | Validation error |
| V1629\_m | {r390} = {r400} | Should be {r390} >= {r400} | Validation error |
| V1632\_m | {r200} = {r230} | Should be {r200} >= {r230} | Validation error |
| V1644\_m | {c215} = {c220} | 1. Will SME supporting factor always have no effect on these exposures?
2. What are the supporting factors?
3. Would the validation still work if there was a supporting factor?
 | Query |
| V1658\_m | {c200} <= {c210} | Should be c200 >= c210 | Validation error |
| V1660\_m | {c200} <= {c210} | Should be c200 >= c210 | Validation error |
| V1664\_m | {c255} = {c260} | 1. Will SME supporting factor always have no effect on these exposures?
2. What are the supporting factors?
3. Would the validation still work if there was a supporting factor?
 | Query |
| v1780\_h | {F 01.01 , r330} = +{F 01.01 , r340} +{C 04.00 , r010} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
| v1781\_h | {F 01.02 , r240} = +{F 01.02 , r250} +{C 04.00 , r050} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
| V1920\_mV1921\_m | F1.03, r128 | This row is indented incorrectly in the DPM, although is correct in the Annexes | DPM error |
| V1929\_m | {F 02.00, r370} <= +{F 44.03, r010} + {F 44.03, r020} | Should be {F 02.00, r370} **>=** +{F 44.03, r010} + {F 44.03, r020} | Validation error |
|  | {C 06.00 , r999 , c025}≡{F 40.01 , r999 , c010} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
|  | {C 06.00 , r999 , c040}≡{F 40.01 , r999 , c150} | This rule cross-validates between FINREP and COREP. We understood these rules had all been removed. | Cross-validation |
|  | {F 20.04, r140,c030} ≡ {F 20.07, r190,c020} | Should be {F 20.04, **r190**,c030} ≡ {F 20.07, r190,c020} | Validation error |

Template errors

* Rows 020 and 030 on template C2.00 refer to incorrect Article numbers. The Article numbers mentioned refer to an earlier draft of the CRR and need to be updated so that they refer to Articles 95 to 98.
* Regarding template C5.01, we are not convinced that the greying out of cells is correct on this template, particularly in the area r200 to r232. This is because the rows relating to CET1, AT1 and T2 are not restricted to the columns that relate to the same concepts.

Discrepancies between ITS v042 and Taxonomy v046

The differences have been found while viewing the taxonomy using DPM Architect and comparing with the ITS.

* COREP table C22 extra currencies have been added after r410c10 (Present in DPM Architect but not present in ITS Excel sheet)

New Currencies in DPM ARCHITECT are as follows:

* Hong Kong Dollar (410)
* New Taiwan Dollar (420)
* New Zealand Dollar (430)
* Singapore Dollar (440)
* Won (450)
* Yuan Renminbi (460)
* COREP table c12.00, cell  r250c280 to r290c280 is grayed in ITS Excel sheet but not grayed in DPM Architect
* COREP table c08.01, cell r170c30 is grayed in ITS Excel sheet but not grayed in DPM Architect
* COREP table c08.01, cell r180c30 is grayed in ITS Excel sheet but not grayed in DPM Architect
* COREP table c08.01, cell r40C260 is grayed in ITS Excel sheet but not grayed in DPM Architect
* COREP table c08.01, cell r50c260 is grayed in ITS Excel sheet but not grayed in DPM Architect
* COREP table c08.01, cell r60c260 is grayed in ITS Excel sheet but not grayed in DPM Architect