

18th XBRL Europe Day

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Amsterdam, The Netherlands

**XBRL | EUROPE**

**XBRL | NL**

Use case AnaCredit implementation  
in a major bank

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TopBI



# Quick introduction

- Pascal Snijders
- BI consultant at TopBI, a Dutch specialist in business intelligence, datawarehousing and analytics solutions
- 10 years working on Credit Risk data- and reporting solutions for large Dutch banks



# AnaCredit implementation in a major bank

# Background AnaCredit

- Project started by ECB in 2011 to centrally collect granular credit and credit risk data
- Emphasis on harmonized concepts and definitions and high level of data quality
- Enabling and supporting wide variety of ESCB/ECB functions: monetary policy, macroprudential supervision, risk management, research, statistics, financial stability
- Minimize reporting burden by increased stability in reporting requirements and less ad hoc requests
- ECB regulation (ECB/2016/13) approved 18 May 2016

# Overview of regulation

- Conventional lending products
- to Legal Entities
- > 25000€

First full reporting based on Sept 2018;  
Counterparty data 6 months earlier;  
Delivery to NCB's from 31/12/2017

Monthly (wd 30)  
Quarterly (wd 15)

Credit Institutions  
& Foreign branches

via NCB's to ECB

  
EUROPEAN CENTRAL BANK

- 2 templates
- 5 granular levels
- 10 datasets
- 88 datapoints
- 7 identifiers

# Data requirements

Template 1

Counterparty reference data 22 dp

Counterparty risk data 1 dp

Counterparty default data 2 dp

Counterparty-Instrument data 1 dp

Joint liabilities data 1 dp

Instrument data 23 dp

Financial data 11 dp

Accounting data 16 dp

Instrument-Protection received data 2 dp

Protection received data 9 dp

**88 datapoints**



**counterparty**



**instrument**



**protection**



AnaCredit  
delivery

Credit  
Institution

NCB  
ECB

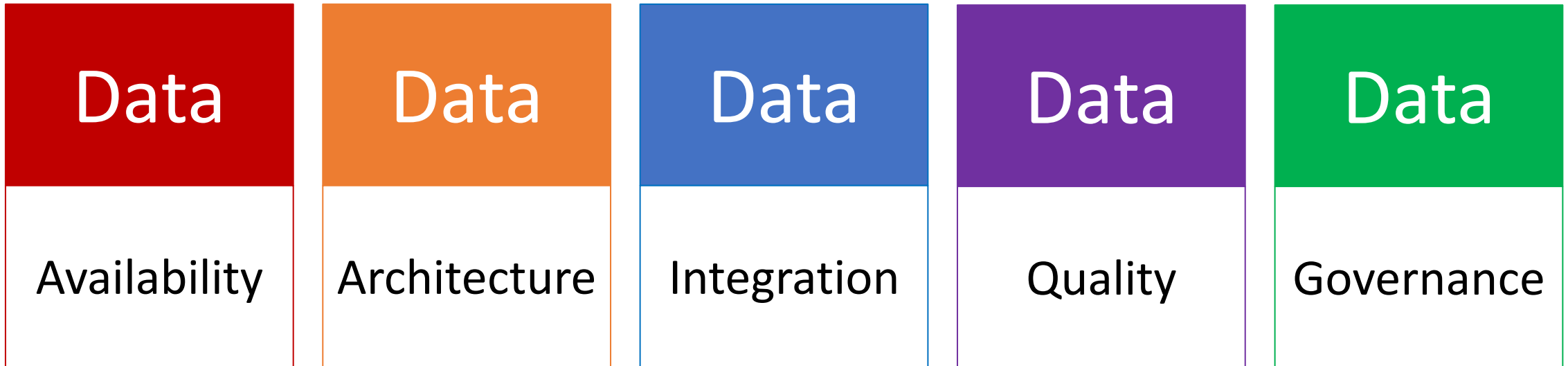




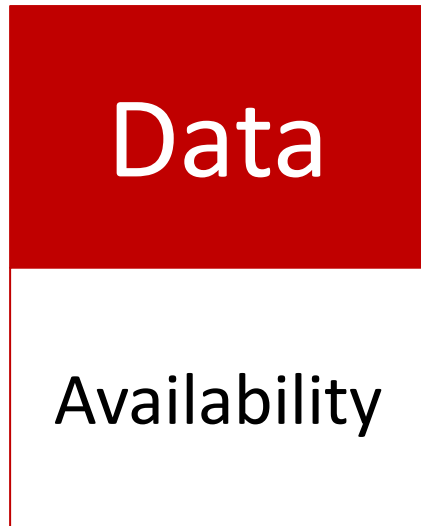




# Implementation



# Data availability



- Is all requested data captured
  - E.g. Protection (collateral) data and Non-Performing data
- Is it captured at the right granular level
  - E.g. Write-offs at instrument level, Protection allocated value, Performing Status of each instrument
- Is it available centrally
  - All data of Credit Institution and foreign branches is needed
- Actual, synchronized and on time

# Data architecture

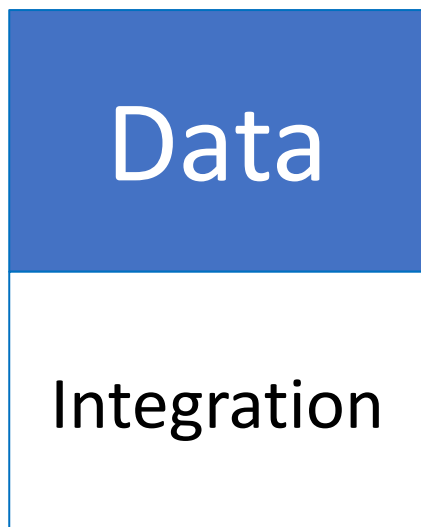
Data

Architecture

- Fit for large volumes of data
- Enterprise view, not an isolated solution
- Able to quickly assemble all granular data
- Address data lineage
- Efficient data logistics: from local origination to centralized assembly in required reporting format

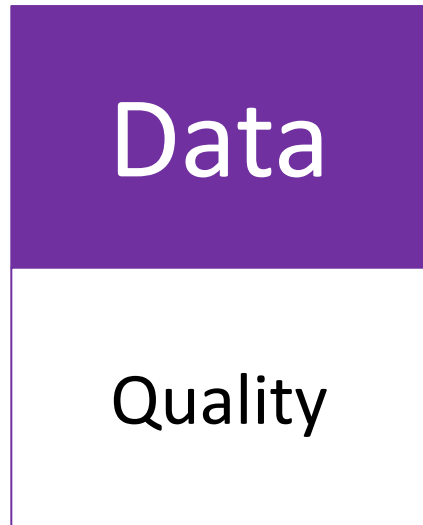


# Data integration



- Integration to reach and maintain coherence between
  - Core banking data
  - Counterparty reference data
  - Accounting data
  - Risk data, e.g. collateral (protection) data
- This requires not only technology, but a culture where this importance is understood

# Data quality



- Granular data needs to be of very high quality for AnaCredit submission. Detailed definitions are provided, e.g

Institutional sector	Data attribute	
		Institutional sectors in accordance with Regulation (EU) No 549/2013, Regulation (EU) No 575/2013 and Regulation (EU) No 1075/2013 of the European Central Bank (ECB/2013/40) <sup>14</sup> .

- High quality can only be obtained and maintained if own business data is well defined, owned, understood, used and managed
- Robust control framework is needed covering well defined roles, responsibilities, processes
- Quality of data needs to be measured, monitored and managed

# Data governance

Data

Governance

- Definition, awareness and adoption of processes, roles and responsibilities, such as data- and definition owners, data stewards, report owners
- Implementation at all organisational levels: operational, tactical, strategic
- Goal is to ensure data is managed continuously, can be trusted and is fit for purpose



# Other implementation factors

## Reconciliation

To other regulatory reporting requirements, such as CoRep, FinRep

## Alignment

With requirements such as BCBS239, Stress Testing and IFRS9

## Capacity

To handle the change in organisation and infrastructure



# XBRL suggestions

- **Inclusion local differences**  
Capture National Discretions applied by National Central Banks
- **Data validation**  
Search for close link between XBRL validations and XBRL rules/formulas on one hand and DQ implementation at NCB's and Credit Institutions on other hand
- **Consistency**  
Ensure consistency between AnaCredit taxonomy and taxonomies of other closely linked regulation (e.g. CoRep, FinRep)

Thank you