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# SRB DATA COLLECTIONS & XBRL-CSV APPROACH

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Single Resolution Board

*Disclaimer: The views expressed are those of the presenter and do not necessarily reflect those of the Single Resolution Board. These slides are for presentation purposes only.*

https://srb.europa.eu

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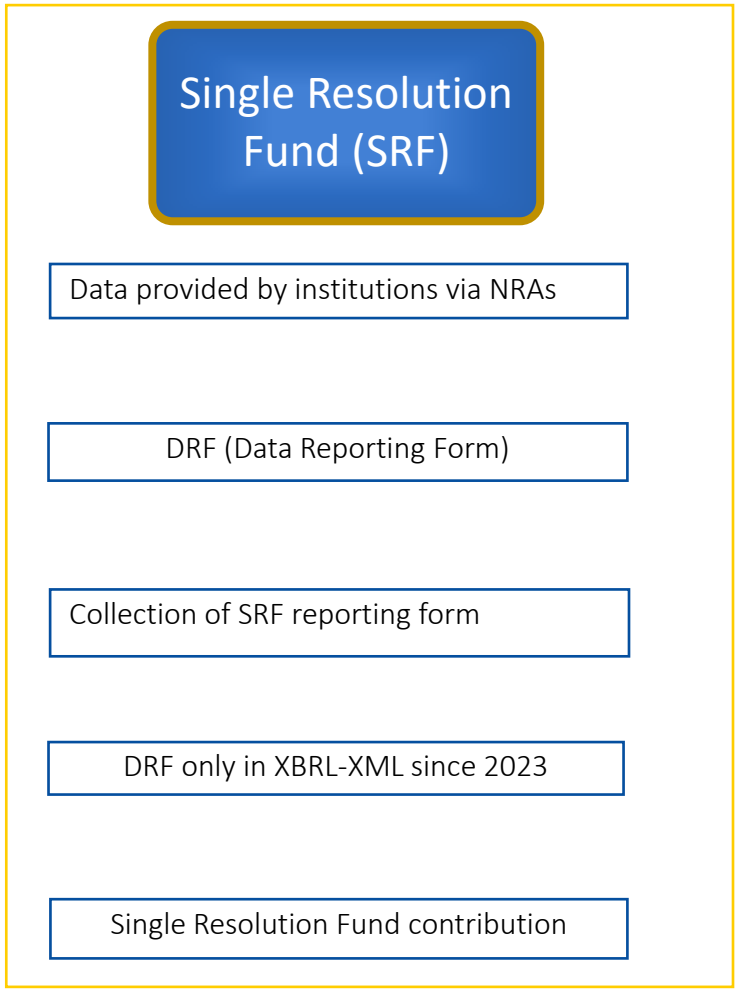
# SRF data collection




- The SRF at 31 December 2023 represented EUR 78 billion and therefore reached the target level of at least 1% of covered deposits held in the Member States participating in the SRM.
- No regular annual contributions will be collected in 2024 from the institutions falling in scope of the SRF, and contributions would only be collected in the event of specific circumstances or resolution actions involving the use of the SRF.
- Under normal circumstances, the target level verification exercise will be performed each year to confirm that the available financial means at the SRF are at least 1% of the amount of covered deposits of all credit institutions authorised in the Participating Member States. If the result of such exercise should prescribe so, the SRB will restart the regular collection of contributions to SRF. The industry will be informed accordingly.
- For the above mentioned reason, the data will be collected in 2025 (even if the SRF is not used) in order to perform the target level verification exercise. Therefore, the taxonomy for the 2025 cycle will be ready by July 2024 as usual.
- For SRF Data collection we will continue to collect the data in XBRL-XML (i.e. not adaptation to XBRL-CSV at the moment) with the current glossary.

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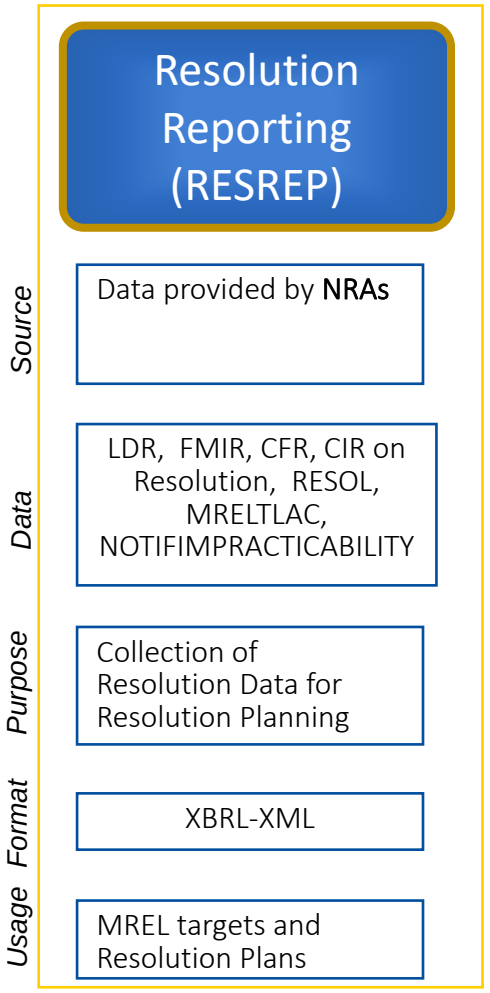
# Current ResRep data collection



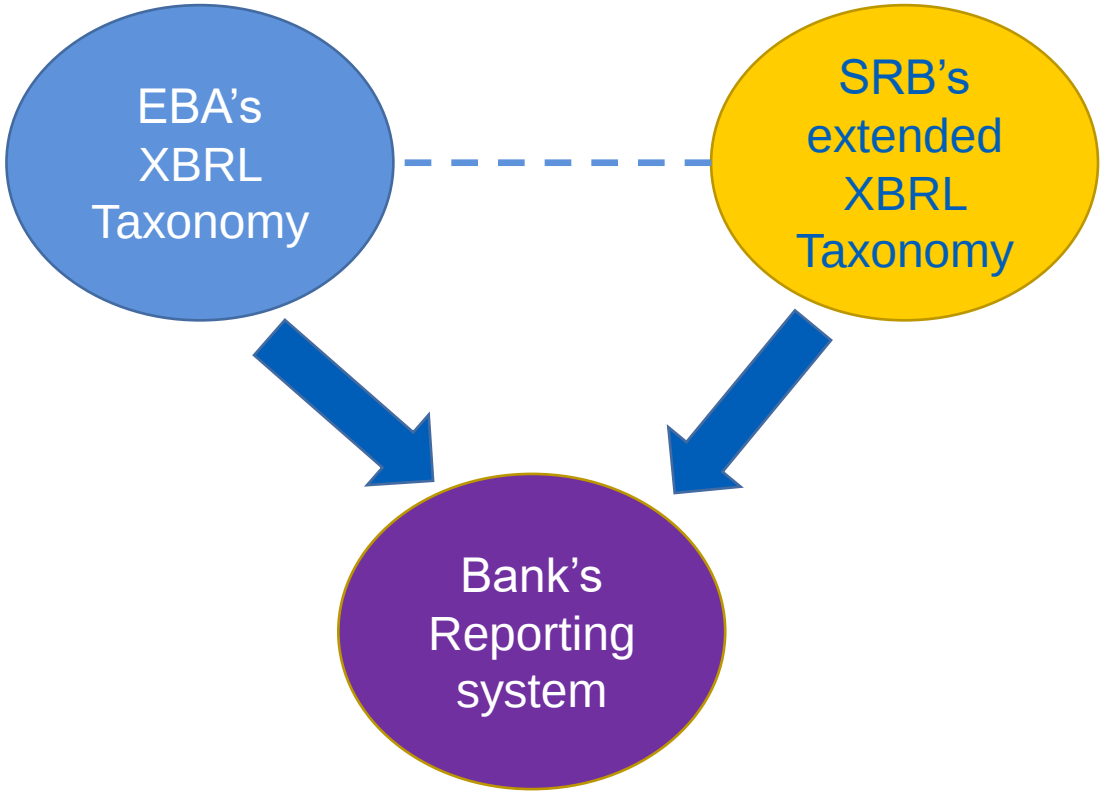
# ResRep summary

| | MREL TLAC reporting & disclosures | Art 55 Notifications | Resolution Reporting 2024 |
|---|---|---|---|
| **Format** | Exclusively in XBRL | Exclusively in XBRL | Exclusively in XBRL |
| **Frequency** | Quarterly | Monthly | Annually |
| **Sequential Reporting** | Yes | No | Yes |
| **Reporting Framework** | EBA 3.2 (EBA 3.5 from ref. date 30-09-2024) | EBA 3.2 for reference date 31-12-2021 onwards | **SIs**: EBA 3.2 + SRB extension RES 8.0.2<br>**LSIs**: EBA 3.2 |
| **Guidance** | Commission Implementing Regulation 2021/763 | Draft EBA RTS/ITS | Commission Implementing Regulation 2018/1624 |

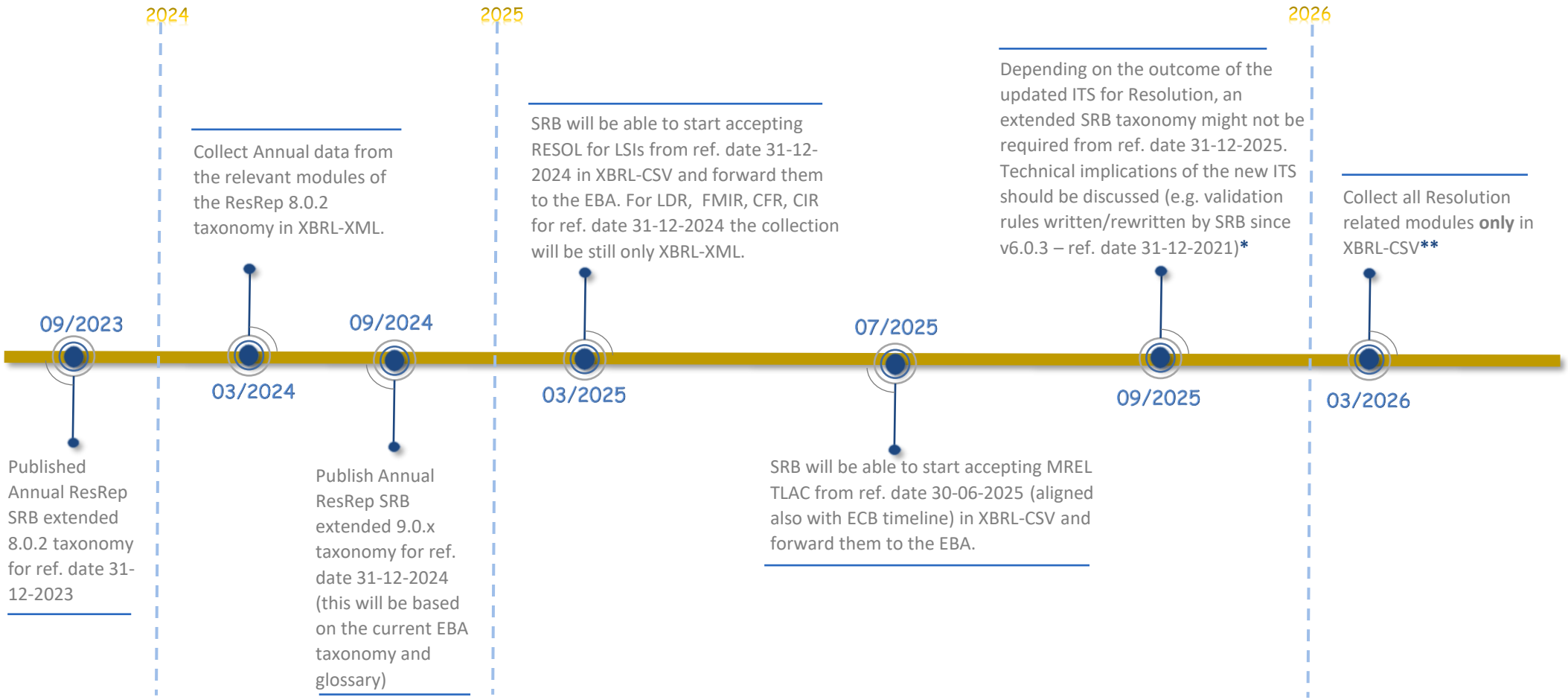
# MREL Decisions

| | MREL Decisions (Reported by the SRB for banks under its remit) |
|---|---|
| Format | XBRL (to the EBA) |
| Frequency | Annually EBA deadline : 31/05/2024 for RPC |
| Sequential Reporting | No |
| Reporting Framework | EBA 3.2 |
| Guidance | Commission Implementing Regulation 2021/622 |

# EBA/SRB Rules alignment examples



# XBRL-CSV Adoption at the SRB - Draft Timeline




**NOTES**

* The changes under the proposed updated ITS on resolution planning will be covered in EBA taxonomy version 4.2 (Tentative Timeline communicated by the EBA. Taxonomy should be available in March 2025).

** Only re-submissions from ref. date 30-11-2025 for NOTIFIMPRACTICABILITY or/and ref. date 30-09-2025 for MREL TLAC or/and from ref. date 31-12-2024 for the annual modules (e.g. RESOL, LDR, etc.) will be accepted in XBRL-XML.

# SRB Assessment and Proposal for XBRL-CSV with multiple facts per row for RES/SUP

- EBA defined an XBRL-CSV format having 1 fact per row (**data-point centric modelling**).

- At the SRB, we believe that the approach where each row contains 1 fact is not very efficient. We propose to define a 'plain' XBRL-CSV where a row can contain multiple facts for a given key (**table centric modelling**). The approach of the plain XBRL-CSV is also proposed by the EBA but only for the DORA CTPP Designation at the moment.

| XBRL-XML | EBA XBRL-CSV (1 fact per row) | XBRL-CSV (multiple facts per row) |
|---|---|---|
| **Full semantic dimensions associated to each fact** | Simpler identification of fact by datapointID (as defined by the EBA) | Simpler identification of fact by row-column coordinates (same as in the annotated tables) |
| **Many verbose text lines are necessary to report one fact (full dimensional context + metric & value)** | One fact per row | Plain-tabular, multiple facts per row |
| **Taxonomy as the Single Source of Truth** | Taxonomy + EBA DPM database (MS Access) | Taxonomy as the Single Source of Truth |

**Could apply for all Regulatory Reporting modules (RES, SUP, etc.)**

# SRB Assessment and Proposal on XBRL-CSV (2)

During the 15th EBA IT Technical Group (13 March 2024), EBA presented the following on '**Why SUP/RES XBRL-CSV reports with one fact per row CSV structure**'. This structure was decided together with TFERF members in 2020-2021 considering the following constraints and characteristics or SUP/RES module modelling.

**EBA**

There are different kinds of tables in SUP/RES reporting modules (open row table, closed table, open sheet table etc.), it is logic to propose a single data structure for all these different type of tables.

- **SRB proposal: The approach we suggest with a plain XBRL-CSV, multiple facts per row can be defined regardless if the table is open row or closed or open sheet.**

**EBA**

We have also multiple currencies module in SUP/RES domain, one fact per row structure provide the possibilities to indicate different currencies reported for any monetary fact.

- **SRB proposal: A currency column can be created for the modules that are using multiple currencies. This currency column can be considered as an 'attribute' to the amount (and therefore the current 'multiple currency unit' of XBRL can be bypassed)**

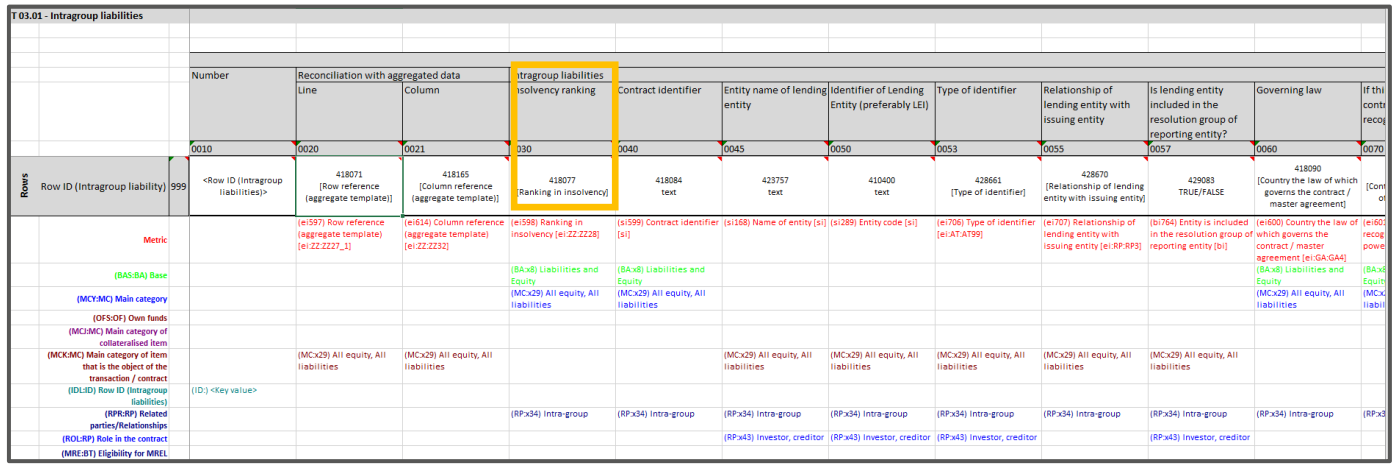
**EBA**

Data point is used to identify each fact because data point is a stable identifier for each data being reported (it does not change from one module version to another module version) .

- **SRB proposal: The data point ID might not change but the table coordinates that define a data point don't change neither (even if the metric and context change between releases). The proposal with the plain XBRL-CSV (with multiple facts per row) is based on the table coordinates (that define a data point).**

# Visual differences (Open Tables)

**T 03.01 (LDR) – Annotated table**



| T 03.01 - Intragroup liabilities | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Number | Reconciliation with aggregated data | | Intragroup liabilities | | | | | | | | |
| | | | Line | Column | Insolvency ranking | Contract identifier | Entity name of lending entity | Identifier of Lending Entity (preferably LEI) | Type of identifier | Relationship of lending entity with issuing entity | Is lending entity included in the resolution group of reporting entity? | Governing law | If thi cont reco |
| | | 0010 | 0020 | 0021 | 0030 | 0040 | 0045 | 0050 | 0053 | 0055 | 0057 | 0060 | 0070 |
| Rows | Row ID (Intragroup liability) 999 | <Row ID (Intragroup liabilities)> | 418071 [Row reference (aggregate template)] | 418165 [Column reference (aggregate template)] | 418077 [Ranking in insolvency] | 418084 text | 423757 text | 410400 text | 428661 [Type of identifier] | 428670 [Relationship of lending entity with issuing entity] | 429083 TRUE/FALSE | 418090 [Country the law of which governs the contract / master agreement] | [Cont of |
| | Metric | | (ei597) Row reference (aggregate template) [ei:ZZ:ZZ27_1] | (ei614) Column reference (aggregate template) [ei:ZZ:ZZ32] | (ei598) Ranking in insolvency [ei:ZZ:ZZ28] | (si599) Contract identifier [si] | (si168) Name of entity [si] | (si289) Entity code [si] | (ei706) Type of identifier [ei:AT:AT99] | (ei707) Relationship of lending entity with issuing entity [ei:RP:RP3] | (bi764) Entity is included in the resolution group of reporting entity [bi] | (ei600) Country the law of which governs the contract / master agreement [ei:GA:GA4] | (ei60 recog powe |
| | (BAS:BA) Base | | | | (BA:x8) Liabilities and Equity | (BA:x8) Liabilities and Equity | | | | | | (BA:x8) Liabilities and Equity | (BA:x Equit |
| | (MCY:MC) Main category | | | | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | | | | | | (MC:x29) All equity, All liabilities | (MC:x liabil |
| | (OFS:OF) Own funds | | | | | | | | | | | | |
| | (MCI:MC) Main category of collateralised item | | | | | | | | | | | | |
| | (MCK:MC) Main category of item that is the object of the transaction / contract | | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | | | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | (MC:x29) All equity, All liabilities | | |
| | (IDL:ID) Row ID (Intragroup liabilities) | (ID:) <Key value> | | | | | | | | | | | |
| | (RPR:RP) Related parties/Relationships | | | | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x34) Intra-group | (RP:x3 |
| | (ROL:RP) Role in the contract | | | | | | (RP:x43) Investor, creditor | (RP:x43) Investor, creditor | (RP:x43) Investor, creditor | | (RP:x43) Investor, creditor | | |
| | (MRE:BT) Eligibility for MREL | | | | | | | | | | | | |

- The XBRL-CSV with 1 fact per row could be complicated and not so easy to read as multiple lines are required to represent one row of the annotated table (which are grouped by IDL – which represents the row in the open annotated table).
- The data point version id is used in the specific transformation example (from multiple facts to one fact). However, when automating this in a proper XBRL-CSV with one fact per row, the data point ID should be taken into account (which could also not be the same with the data point version id some times). The source of truth for the data point id is the DPM.

**EBA XBRL-CSV Structure One fact per row**

| datapoint,factValue,IDL |
|---|
| dp418071,eba_ZZ:x240,1 |
| dp418165,eba_ZZ:x291,1 |
| dp418077,eba_ZZ:x262,1 |
| dp418084,id12345678,1 |
| dp423757,Counterparty,1 |
| dp410400,456ABC1532,1 |
| dp428661, eba:ATsi7,1 |
| dp428670, eba_RP:x56,1 |
| dp428670,TRUE, 1 |

Example of Fact id = T_03-01.r_3.factValue → row id = 3rd line of data in the XBRL-CSV file (i.e. the physical line number in the XBRL-CSV file)

**XBRL-CSV Structure Multiple facts per row**

| c0010 | c0020 | c0021 | c0030 | c0040 | c0045 | c0050 | c0053 | c0055 | c0057 | c0060 | c0070 | c0080 | c0090 | c0100 | c0110 | c0120 | c01 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | eba_ZZ:x24 | eba_ZZ:x | 9 eba_ZZ:x2 | id12345678 | Counterpar | 456ABC153 | eba_AT:si7 | eba_RP:x5 | TRUE | eba_GA:FR | eba_ZZ:x32 | 184643.95 | 0.00 | eba_CU:EU | 1994-12-07 | 2019-01-01 | 201 |
| 2 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345679 | Counterpar | 123ABC465 | eba_AT:si7 | eba_RP:x57 | TRUE | eba_GA:FR | eba_ZZ:x32 | 219177.89 | 0.00 | eba_CU:EU | 1999-12-29 | 2019-01-01 | 201 |
| 3 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345680 | Counterpar | 123ABC465 | eba_AT:si7 | eba_RP:x57 | TRUE | eba_GA:FR | eba_ZZ:x32 | 8.00 | 0.00 | eba_CU:EU | 2012-01-04 | 2019-01-01 | 201 |
| 4 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345681 | Counterpar | 456ABC153 | eba_AT:si7 | eba_RP:x5 | TRUE | eba_GA:FR | eba_ZZ:x32 | 20871.15 | 0.00 | eba_CU:EU | 1999-01-07 | 2019-01-01 | 201 |
| 5 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345682 | Counterpar | 456ABC153 | eba_AT:si7 | eba_RP:x5 | TRUE | eba_GA:FR | eba_ZZ:x32 | 6837.50 | 0.00 | eba_CU:EU | 2004-01-09 | 2019-01-01 | 201 |
| 6 | eba_ZZ:x24 | eba_ZZ:x2 | eba_ZZ:x26 | D12345683 | Counterpar | 123ABC465 | eba_AT:si7 | eba_RP:x57 | TRUE | eba_GA:FR | eba_ZZ:x32 | 3020.32 | 0.00 | eba_CU:EU | 2013-04-18 | 2019-01-01 | 201 |
| 7 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345684 | Counterpar | 456ABC153 | eba_AT:si7 | eba_RP:x5 | TRUE | eba_GA:FR | eba_ZZ:x32 | 2479.34 | 0.00 | eba_CU:EU | 2005-03-23 | 2019-01-01 | 201 |
| 8 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345685 | Counterpar | 456ABC153 | eba_AT:si7 | eba_RP:x5 | TRUE | eba_GA:FR | eba_ZZ:x32 | 613523.63 | 0.00 | eba_CU:EU | 2008-06-10 | 2019-01-01 | 201 |
| 9 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345686 | Counterpar | 123ABC465 | eba_AT:si7 | eba_RP:x57 | TRUE | eba_GA:FR | eba_ZZ:x32 | 35720.00 | 0.00 | eba_CU:EU | 2003-12-22 | 2019-01-01 | 201 |
| 10 | eba_ZZ:x24 | eba_ZZ:x29 | eba_ZZ:x26 | ID12345687 | Counterpar | 123ABC465 | eba_AT:si7 | eba_RP:x57 | TRUE | eba_GA:FR | eba_ZZ:x32 | 195599.95 | 0.00 | eba_CU:EU | 1999-12-29 | 2019-01-01 | 201 |

Example of Fact id = T_03-01.r_**1**.c0030 → row id = 1 because 1 is the value of the current row in column c0010 (i.e. the value which match with the row-column coordinate defined in annotated table)

Fact id (as explained by XBRL International) = {table-identifier}.{row-identifier}.{column-identifier}

# Visual differences (Closed Tables)

**T 01.00.a (LDR) – Annotated table**

T 01.00.a - Liability structure - outstanding amount

| | | Columns | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | Households | Micro & SME | Corporates | Institutions | Other financial corporations | | Government, central banks & supranationals | |
| | | Outstanding amount | Outstanding amount | Outstanding amount | Outstanding amount | Outstanding amount | Of which Insurance firms & pension funds | Outstanding amount | |
| | | | | | | | Outstanding amount | | |
| | | 0012 | 0022 | 0032 | 0042 | 0052 | 0062 | 0082 | |
| Liabilities excluded from bail-in | 0100 | 417580 €£$ | 417607 €£$ | 428262 €£$ | 417555 €£$ | 417678 €£$ | 417653 €£$ | 417702 €£$ | |
| Covered deposits (BRRD art. 44/2/a) | 0110 | 417253 €£$ | 417254 €£$ | 428223 €£$ | €£$ | 417257 €£$ | 417256 €£$ | 417258 €£$ | |
| Secured liabilities - collateralized part (BRRD art. 44/2/b) | 0120 | 417490 €£$ | 417496 €£$ | 428246 €£$ | 417484 €£$ | 417514 €£$ | 417508 €£$ | 417520 €£$ | |
| Client liabilities, if protected in insolvency (BRRD art. 44/2/c) | 0130 | 417264 €£$ | 417266 €£$ | 428224 €£$ | 417262 €£$ | 417272 €£$ | 417270 €£$ | 417274 €£$ | |
| Fiduciary liabilities, if protected in insolvency (BRRD art. 44/2/d) | 0140 | 417265 €£$ | 417268 €£$ | 428225 €£$ | 417263 €£$ | 417273 €£$ | 417271 €£$ | 417275 €£$ | |
| Institution liabilities < 7 days (BRRD art. 44/2/e) | 0150 | €£$ | €£$ | €£$ | 417548 €£$ | 417671 €£$ | 417646 €£$ | €£$ | |
| System (operator) and CCP liabilities < 7 days (BRRD art. 44/2/f) | 0161 | 460414 €£$ | 460416 €£$ | 460415 €£$ | 460413 €£$ | 460420 €£$ | 460418 €£$ | 460421 €£$ | |

Fact id (as explained by XBRL International) = {table-identifier}.{row-identifier}.{column-identifier}

**EBA XBRL-CSV Structure One fact per row**

| datapoint,factValue |
|---|
| 417580, 25221259467 |
| 417607, 787504842 |
| 428262, 42637743 |
| 417555, 872679379 |
| 417678, 148722392 |
| 417653, 0 |

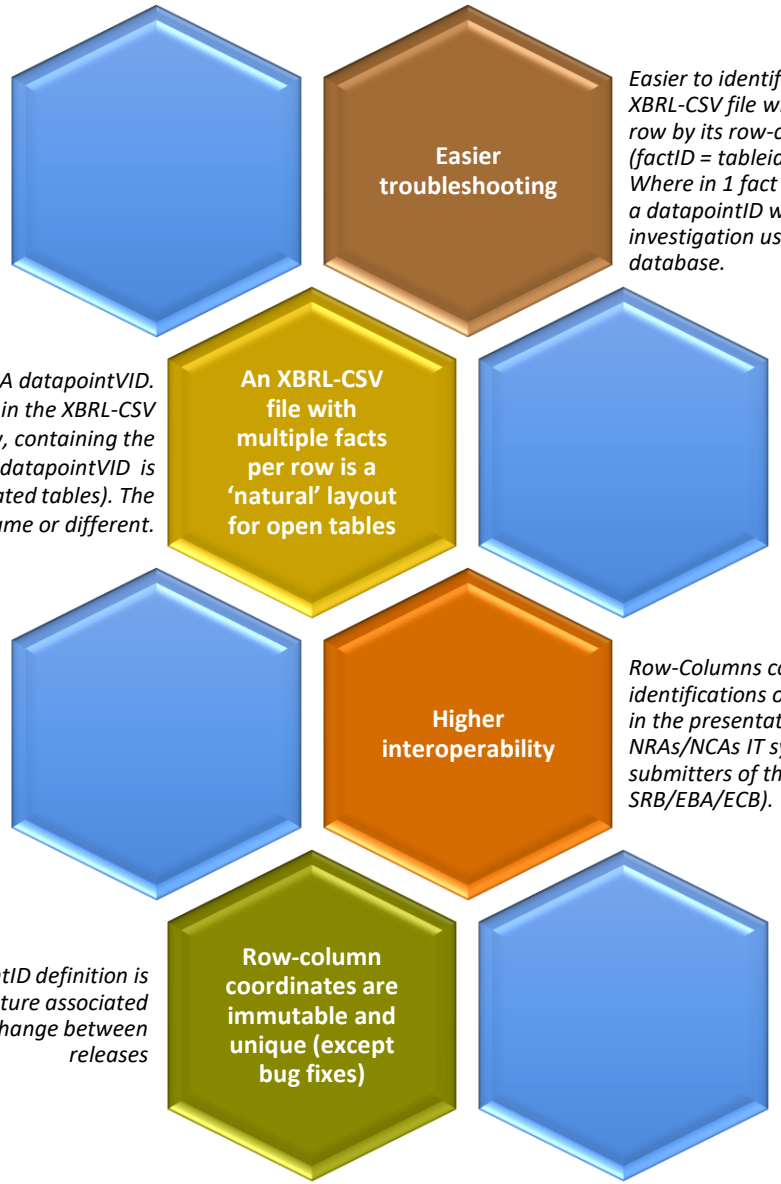
Example of Fact id = = T_01-00-a.r_4.factValue

**XBRL-CSV Structure Multiple facts per row**

| rcode | c0012 | c0022 | c0032 | c0042 | c0052 | c0062 | c0082 | c0092 | c0102 | c0122 | c0132 | c0142 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| r0100 | 25221259467 | 787504842 | 42637743 | 872679379 | 1487223920 | 0 | 65519550 | 0 | 445169481 | 28921994383 | 2183187946 | 0 |
| r0110 | 25154395467 | 787504842 | 42637743 | | 0 | 0 | 1147133 | | 479881 | 25986165066 | 0 | 0 |
| r0120 | 0 | 0 | 0 | 637346426 | 1487223920 | 0 | 39854017 | 0 | 0 | 2164424362 | 2124570346 | 0 |
| r0130 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| r0140 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| r0150 | | | | 176715354 | 0 | 0 | | | | 176715354 | | 0 |
| r0161 | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 403928000 | 403928000 | 0 | 0 |
| r0170 | 66864000 | | | | | | | | | 66864000 | | 0 |
| r0180 | 0 | 0 | 0 | 58617600 | 0 | 0 | 0 | 0 | 40761600 | 99379200 | 58617600 | 0 |
| r0190 | | | | | | | 24518400 | | | 24518400 | | |
| r0200 | | 0 | 0 | 0 | 0 | 0 | 0 | | | 0 | 0 | 0 |
| r0210 | | | | 0 | 0 | 0 | | | | 0 | 0 | |
| r0300 | 1102302114 | 451917942 | 1946887746 | 6238016865 | 433647659 | 420051124 | 1553212799 | 0 | 355210581 | 12081195705 | 6163469417 | 0 |
| r0310 | 1094304250 | 451917942 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1546222191 | 0 | 0 |
| r0311 | 1052164377 | 413428182 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1465592559 | 0 | 0 |
| r0312 | 11776906 | 6868501 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18645406 | 0 | 0 |
| r0313 | 9101762 | 10896847 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 19998610 | 0 | 0 |
| r0314 | 21261204 | 20724412 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 41985616 | 0 | 0 |
| r0320 | 0 | 0 | 1946887746 | 1506681 | 433586857 | 420051124 | 1553212799 | 0 | 981 | 3935195064 | 2436420 | 0 |
| r0321 | 0 | 0 | 1640448191 | 1506681 | 210081118 | 201091432 | 1427095797 | 0 | 981 | 3279132768 | 2436420 | 0 |
| r0322 | 0 | 0 | 36771136 | 0 | 77152661 | 72589966 | 53705543 | 0 | 0 | 167629340 | 0 | 0 |
| r0323 | 0 | 0 | 42611960 | 0 | 65313590 | 65271056 | 22512266 | 0 | 0 | 130437816 | 0 | 0 |
| r0324 | 0 | 0 | 227056460 | 0 | 81039488 | 81098671 | 49899192 | 0 | 0 | 357995140 | 0 | 0 |
| r0330 | | | | | | | | | | | | |
| r0331 | 0 | 0 | 0 | 353077256 | 0 | 0 | 0 | 0 | 0 | 353077256 | 353077256 | 0 |
| r0332 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Example of Fact id = T_01-00-a.r_r0100.c0042

# Advantages of XBRL-CSV with multiple facts per row




*Easier to identify an error in an XBRL-CSV file with multiple facts per row by its row-columns coordinates (factID = tableid.rowid.columnid) . Where in 1 fact per row, you will get a datapointID which will require investigation using the DPM database.*

*Confusion with EBA datapointID and EBA datapointVID. The EBA datapointID only appears in the XBRL-CSV metadata (i.e the json file in the taxonomy, containing the definition of CSV format), while the EBA datapointVID is used in the Business templates (i.e. annotated tables). The two IDs can be sometimes the same or different.*

*Row-Columns coordinates for identifications of facts already exist in the presentation layer of most of NRAs/NCAs IT systems (the submitters of the actual reports to SRB/EBA/ECB).*

*EBA datapointID definition is mutable, the signature associated to the ID might change between releases*

# New Specification: Unique key – foreign key constraints and mandatory columns in open tables

The XBRL International Granular data working group is currently working on a new specification that will improve support for large datasets characterised by many related open tables (published by XBRL International – Table Constraints v1.0). The new specification will provide, for starters, an easy and quick way to enforce unique key (UK) – foreign key (FK) constraints and mandatory columns in open tables.

At the SRB, at the moment, since unique key (UK) – foreign key (FK) check is not possible at the taxonomy level, we perform it as a Level 3 check, after the submission and processing of the XBRL report file. Several examples can be found in our published document 'SRB Level 3 data quality checks'. An example of unique key (UK) – foreign key (FK) constraints level 3 check is displayed below:

| External ID | Status | Last Modified | Applicable from (reporting reference date) | Severity | Modules covered | Templates covered | Prerequisites - apply rule (only) if specified tables are reported | Rule Technical Description | External Data Used | External Data Reference | Error Message |
|---|---|---|---|---|---|---|---|---|---|---|---|
| SRBDQ_0265 | Active | 28/02/2021 | 31/12/2020 | Warning | CIR | Z 10.02; Z 10.01 | Z 10.02; Z 10.01 | For each distinct ({Z 10.02;c0010})= (X) there is a corresponding ({Z 10.01;c0010}) = (X) | No | N/A | In tab 'Z 10.02 Mapping of Information Systems (CIS 2)', each distinct value in the column c0010 'System identification code' should also be provided in the column c0010 'Information system' of tab 'Z 10.01 Critical Information Systems (general information) (CIS 1)' |

FK

UK

# New Specification: Unique key – foreign key constraints and mandatory columns in open tables (2)

Furthermore, with the upcoming mandatory column checks, SRB rules like the **srb_e7493_e** (published on SRB website) will not be needed anymore which will also enhance performance.

The specific rule currently performs mandatory columns checks on the granular table T 06.01 - Other financial Liabilities (not included in other tabs, excluding intragroup), i.e. it checks for existence of value in specific columns.

# Table Constraints with XBRL-CSV (multiple facts per row) Vs with XBRL-CSV (with one fact row)

- The table constraints specifications could apply for CSV table-centric modelling (multiple facts per row), because the “table” could be seen as a Relational database table having multiple columns:
  - Some of the columns can be specified mandatory;
  - Some of columns will make the unique keys or foreign keys of another table in the XBRL-CVS file

- In a datapoint-centric modelling (1 fact per row), only two significant columns exist; (datapointID, factValue). Therefore, the specific table constraints specification can be used for specifying that the column datapointID is mandatory.

# THANK YOU!

Single Resolution Board

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