

# Presentation to supervised entities of Reporting System for supervised entities' financial standing and risks

23 September 2021



#### **Event programme**

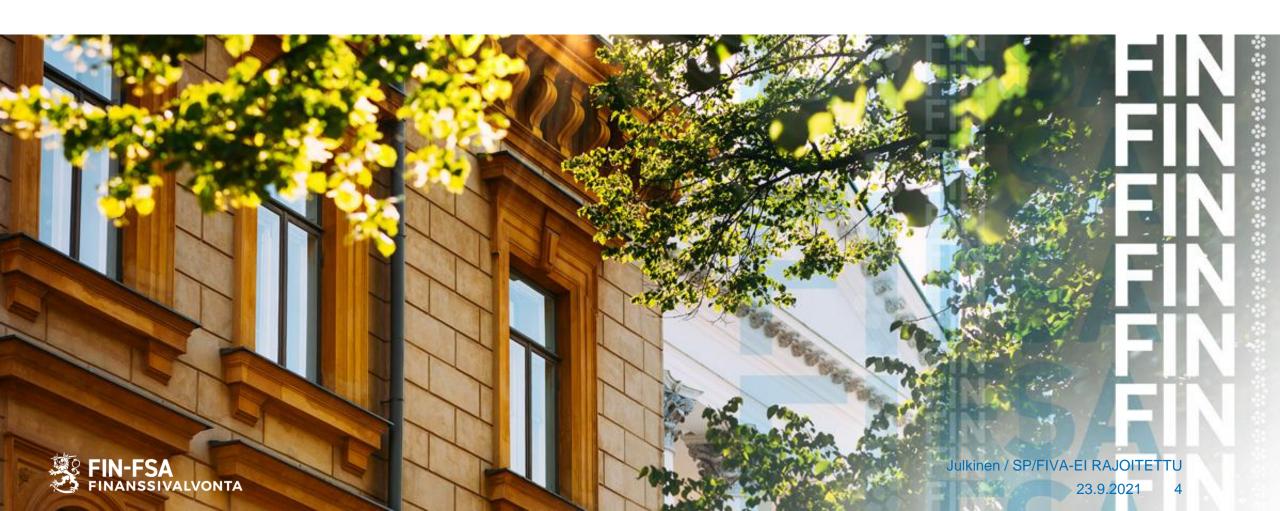
- Opening
- Project presentation and timetable
- Changes to reporting
- Presentation of Suomi.fi service
- Presentation of the Reporting System
- Questions submitted in advance
- Discussion

#### The FIN-FSA is reforming the supervisory Reporting System

- The Reporting System collects and processes reporting determined by EU and national regulations related to the financial standing and risks of supervised entities.
- The efficiency and reliability of the FIN-FSA's current Reporting System have not been sufficient
  - The implementation in the system of new EU-harmonised data collections and new versions of data collections, including reporting applications, requires much resources
  - FIN-FSA's Reporting webinar September 23, 2020: Presentation of the reporting system
- The reform is based on a reporting system already in use elsewhere
  - The timetable for the implementation project has been agreed in collaboration with the system supplier
- The goal is to introduce the new Reporting System in phases from summer 2022
  - It will be possible to submit reports efficiently and securely via a Reporter Portal
  - Up-to-date reporting obligation information will be viewable in the Reporter Portal
  - Reporting-related communication will take place in the Reporter Portal



### Project presentation and schedule Jussi Eronen



#### Status of the implementation project

- The tendering phase ended in the spring of 2021
- The Reporting System delivery project began at the end of May 2021
- A specification refining phase is currently under way in the project
- Installations of test environments are progress
- Planning of internal and external training is about to begin
- Construction of interfaces will begin in November
  - Integration of FIN-FSA and Bank of Finland systems
  - Implementation of Suomi.fi identification and authorisation service
  - Submission of reports to European Central Bank (ECB), European Banking Authority (EBA),
     European Insurance and Occupational Pensions Authority (EIOPA) and the European Securities
     and Markets Authority (ESMA)
- Reporter Portal for reporters' use will be opened on 15 July 2022



#### **Reform of the Reporting System**

- The reform of the Reporting System concerns electronic, formal and regular reporting of financial standing and risks to the FIN-FSA
  - EBA ITS data collections: COREP OF, ALMM, FINREP, LCR DA, LR, LE, SBP CR, SBP RM, SBP IMV, NSFR, FP, REM HE, REM BM, GSII, FRTB, AE, COVID-19 and IF
  - EIOPA ITS data collections: Solvency2, Pension Fund and Pan-European Personal Pension Product
  - ESMA data collections: AIFMD, CSDR 7, CSDR 9 and MMF
  - National data collections: FA, FT, JM, KA, KB, KP, KT, LTC, MA, MJ, ML, MU, MV, R, RVA, S, VA, VB, VC, VD, VE, VF, VG, VJ, VK, VL, VM, VN, VO, VP, VS, VT, VQ, RA and MF.
- Identification and authorisation of Finnish and foreign reporters will take place via the Suomi.fi service
- A Reporter Portal will be made available for reporters' use
  - Up-to-date reporting obligation information will be viewable
  - Submission of reports
  - Reporting-related communication
    - Replaces current communication via the helpdesk mailboxes



#### Submission of reports and feedback

- Reports can be submitted in three different ways
  - By uploading a report file to the system
  - By submitting a report file directly from the reporter's own system via an SFTP connection (Application to Application, A2A)
  - By completing web forms (recommended to be used only for a small number of forms)
    - No web forms are planned for CSDR7, CSDR9 and MMF data collections
- Reporters will see in the Reporter Portal
  - The report processing status
  - Feedback on the report
    - Feedback on a report submitted via an SFTP connection will also come directly to the reporter's own reporting system
- Reporters may submit reports to a testing environment for checking before submitting an official report to the FIN-FSA
  - These reports will not be used for supervision



#### Clarification of timetable for data collections' transfer to production

- EBA ITS data collections to the new system first, in summer 2022
  - COREP LCR DA and ALMM data collections will taken into production on 31 July 2022 and will serve as pilots. The DPM version of these has been in use for a year, so it is unlikely to contain any errors.
  - Although DPM version 3.1 used in the old system will still be valid for nearly all EBA ITS data collections on 30 September 2022, DPM version 3.2 will take effect for the SBP IMV module. DPM version 3.2 must therefore be taken into use at that time.
  - Taking the new system into use for all EBA ITS data collections on 30 September 2022 avoids the need to implement DPM version 3.2 in two systems
- In the next phase, EIOPA ITS data collections will be taken into the new system on 31 December 2022
  - EIOPA ITS data collections' DPM version 2.7 will be applicable from 31 December 2022
    - The DPM version will probably be in use for the whole of next year
    - In practice, DPM version 2.7 must be taken into the new system on 31 December 2022, otherwise it would have to be implemented in both the new and the old system
- The EBA and EIOPA ITS data collection frameworks cannot be put into production at the same time, as the simultaneous introduction of two large data collection frameworks would be too high a risk

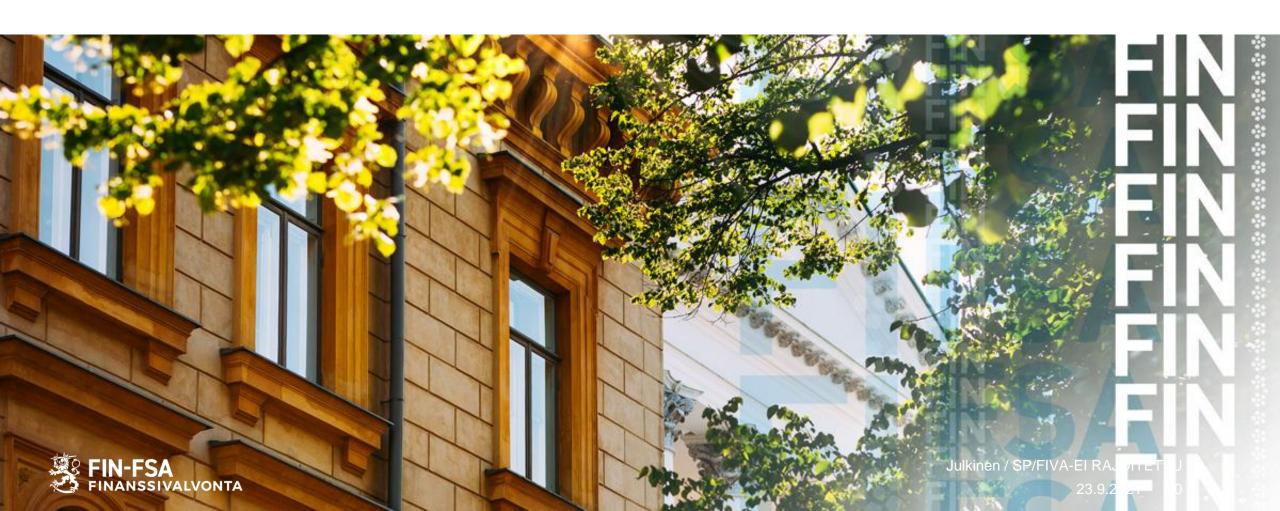


#### Data collections' transfer to production

Date	Reporting entity		
31.7.2022	COREP LCR DA and ALMM		
30.9.2022	FINREP, COREP OF, LR, LE, SBP CR, SBP RM, SBP IMV, NSFR, FP, REM HE, REM BM, GSII, FRTB, AE, COVID-19 and IF		
31.12.2022	Solvency 2, Pension Fund, Pan-European Personal Pension Product and national data collections S, R, LTC, RA, and VJ		
31.3.2023	AIFMD, CSDR 7, CSDR 9 and MMF		

The timetable for national data collections other than the five mentioned above will be further specified during spring 2022.

### Changes to reporting Mikko Koutaniemi



#### **Changes to reporting**

- Reporter Portal will always have up-to-date information on reporting deadlines and information required for each report
  - a) Several ways to submit a report
  - b) Validation feedback will be diversified
- 2. Reporting-related communication will shift primarily to the Reporter Portal
- Reporters' test environment Same up-to-date services as in the production environment
- 4. Impact of the Reporting System reform on report files
- 5. Additional information on XBRL reporting
- 6. Strong identification of reporters using the Suomi.fi service



# 1a. Reporter Portal will always have up-to-date information on reporting deadlines and information required for each report: several ways to submit a report

- Reporters will not need to download and manage FIN-FSA Reporting applications and related forms
- The Jakelu Distribution Service will be withdrawn from use
- Submission of reports to the FIN-FSA
  - A report can be submitted by uploading it in the Reporter Portal
  - A report can be submitted via an SFTP connection
  - A report can be submitted by completing forms in the Reporter Portal
    - No web forms are planned for CSDR7, CSDR9 and MMF data collections



### 1b. The Reporter Portal will always have up-to-date information on reporting deadlines and information required for each report: validation feedback will be diversified

- Validations will be updated more quickly than before to meet the requirements of the European Supervisory Authorities
- Validation feedback will be more diverse and user friendly
- It will not be possible in future to report using email, nor will reporting feedback be sent to email
- There is no need to encrypt report files separately

### 2. Reporting-related communication will shift primarily to the Reporter Portal

- Confidential reporting information will be in one place
- Replaces current communication via the helpdesk mailboxes
- FIN-FSA and Bank of Finland secure email will still be available, but only as a secondary channel



### 3. Reporters' test environment – Same up-to-date services as in the production environment

- Strong identification of reporters using the Suomi.fi service
- Data security as strong as in production
- Data will not be used for supervision
- Banks: In the future, each report submitted to production will be sent to the ECB
  - Testing should be done in the test environment



#### 4. Impact of the Reporting System reform on report files

- Separate header file will not be used in XBRL and XML reporting
- There may be changes to file naming conventions
- Electronic data transmission descriptions under the new Report System will be published six months before the transfer to production of each reporting entity.
  - ESA specifications will be updated in the data submission descriptions after their publication

#### 5. Additional information on XBRL reporting

- Eurofiling <a href="https://eurofiling.info/portal/">https://eurofiling.info/portal/</a>
  - European XBRL reporting specifications
  - XBRL standard
  - Service providers
  - <u>Eurofiling minutes</u> summaries e.g. of reporting changes, events, and changes to the XBRL standard
- XBRL Finland <a href="https://fi.xbrl.org/">https://fi.xbrl.org/</a>



#### 6. Strong identification of reporters using the Suomi.fi service

Act on support services for shared government electronic services (571/2016)

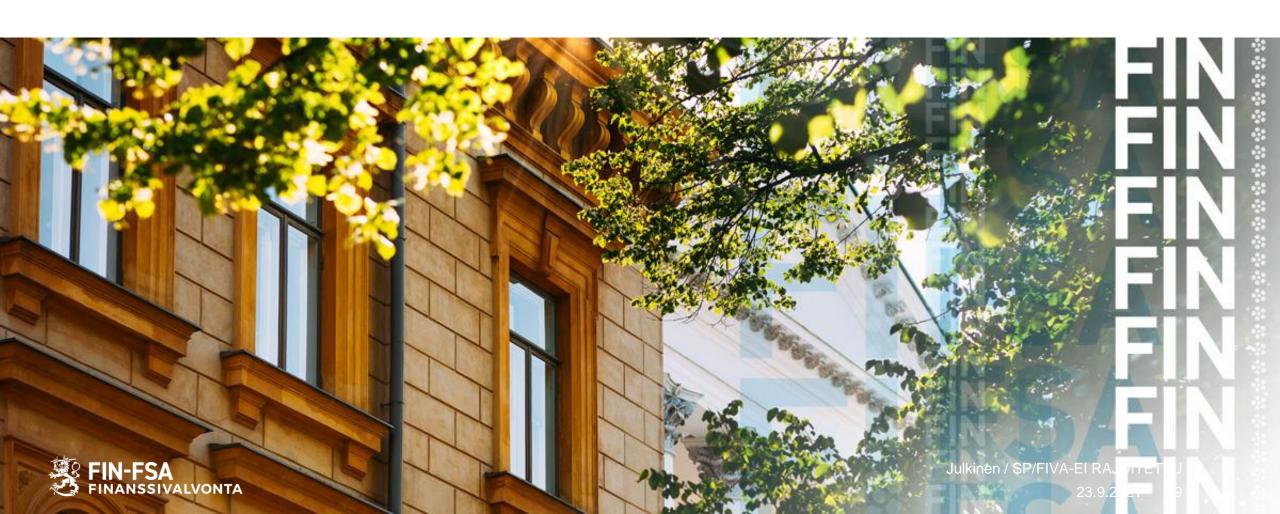
"Section 1 Purpose and scope of the Act

The purpose of this Act is to improve the availability, quality, information security, interoperability and management of public services and to promote the efficiency and productivity of public administration activities."

- Regulates the provision, use and service-specific matters of Suomi.fi services
- As a general rule, public administration organisations have an obligation or right to access the services
- The private sector has the right to access certain services
- <u>Decree of the Ministry of Finance supplementing the Act on support services for shared government electronic services (607/2016).</u>



### Presentation of the Suomi.fi service Riku Luomansuu



#### Overview of the Suomi.fi service

- Suomi.fi carries out checks of transaction authorisations
- When a person acts on behalf of a company, the transaction service checks using Suomi.fi e-Authorisations the person's mandate to do so in general registers (e.g. Trade Register) and the authorisation register (authorisations given in the Suomi.fi e-Authorisations).
- Without separately granted authorisation, only people for whom some role entitling representation has been entered in Finland's Trade Register, and the said role defined as granting entitlement to act in transaction services, can act on behalf of a company, e.g. Managing Director, Chairman of the Board of Directors, Member of the Board etc. <u>Acting</u> on behalf of a company or an organisation - Suomi.fi
- In Suomi.fi e-Authorisations, companies can authorise a person or company to handle matters on their behalf. An authorisation is an electronic power of attorney, the details of which are stored in the authorisation register.



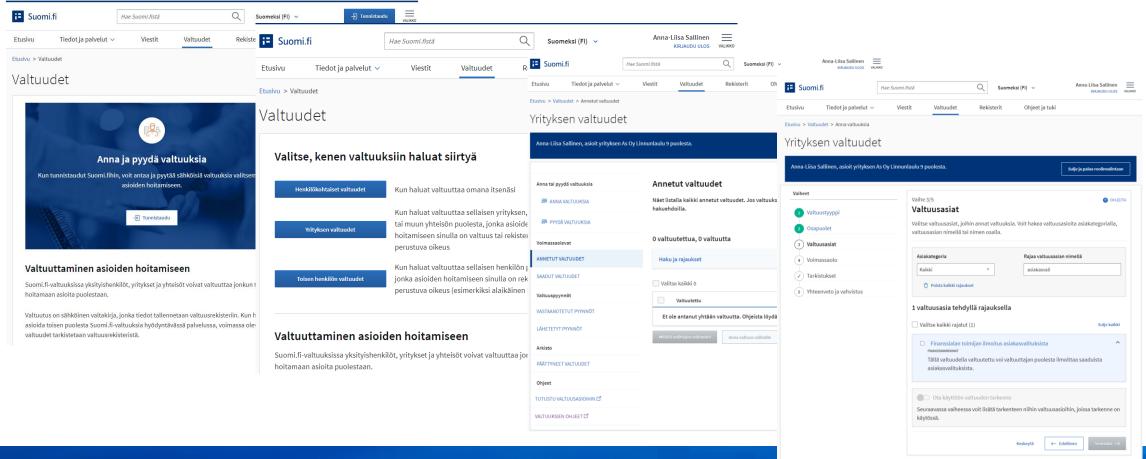
#### Suomi.fi authorisation and identification

- Delegation of authorisations
  - An authorisation or right based on register information is required to handle matters
  - Types of authorisation: mandate for transactions and right to grant a mandate
- Addition of authorisation services
  - Authorisation takes place at the data collection level, of which there are around 60
  - For example COREP OF, COREP AE, COREP LR, COREP LE, FINREP etc.
  - Naming of data collections in the authorisation service is still open
- Once mandates for transactions have been obtained, authentication is done using Suomi.fi. Other options are either the banks' online banking codes or a mobile certificate.
- Foreign actors apply for mandates through DVV's Official-assisted authorisation service, <u>Official-assisted authorisation service | Digital and Population Data Services Agency</u> <u>(dvv.fi)</u>
  - Authentication using the Finnish Authenticator application.



#### Suomi.fi authorisation stages

Address: <a href="https://www.suomi.fi/e-authorisations">https://www.suomi.fi/e-authorisations</a>



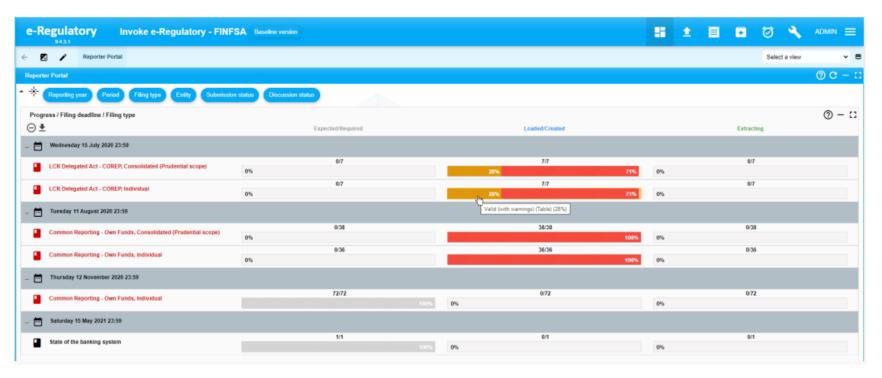


### Presentation of the Reporting System Jouni Lamponen



#### Reporting obligations according to user authorisations

Preliminary example

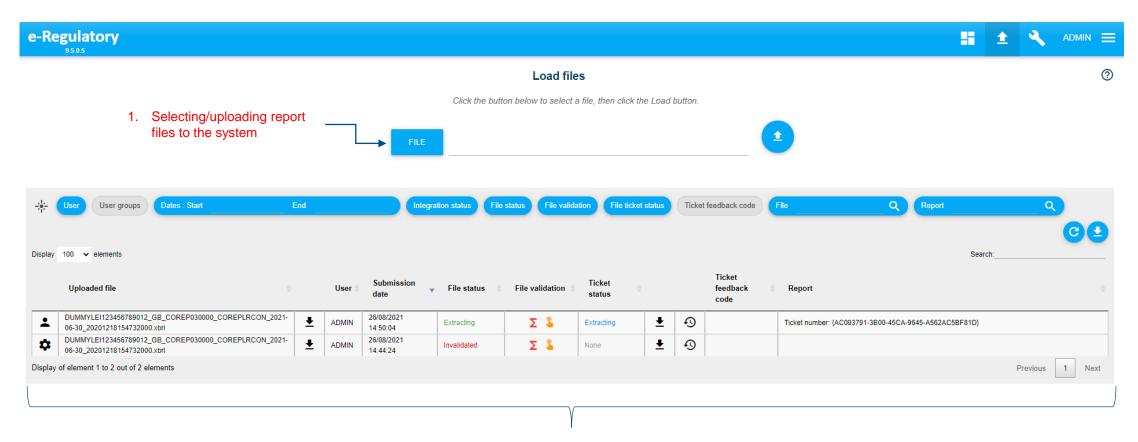


- What should be reported and when (also history)
- What has been sent and not sent
- Status of submitted reports



#### **Submitting reports in Reporter Portal**

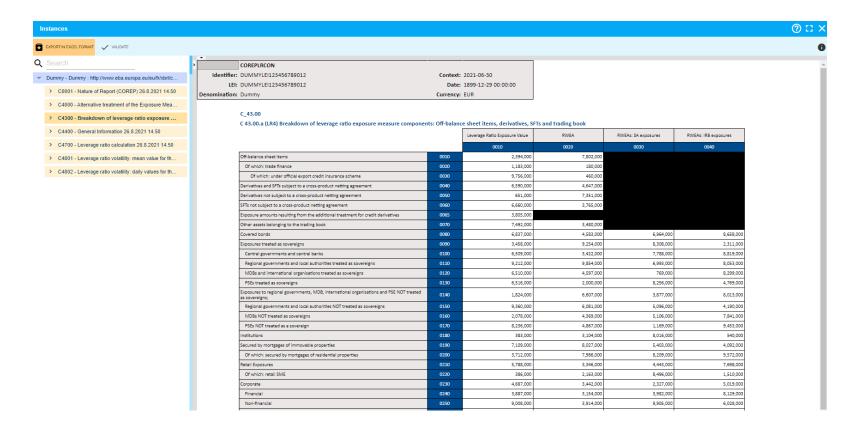
Preliminary example



2. Information related to the report and its processing, e.g. report sender and submission method, report processing status and validation results, submission time etc.

#### Preliminary example

#### Reporting using web forms

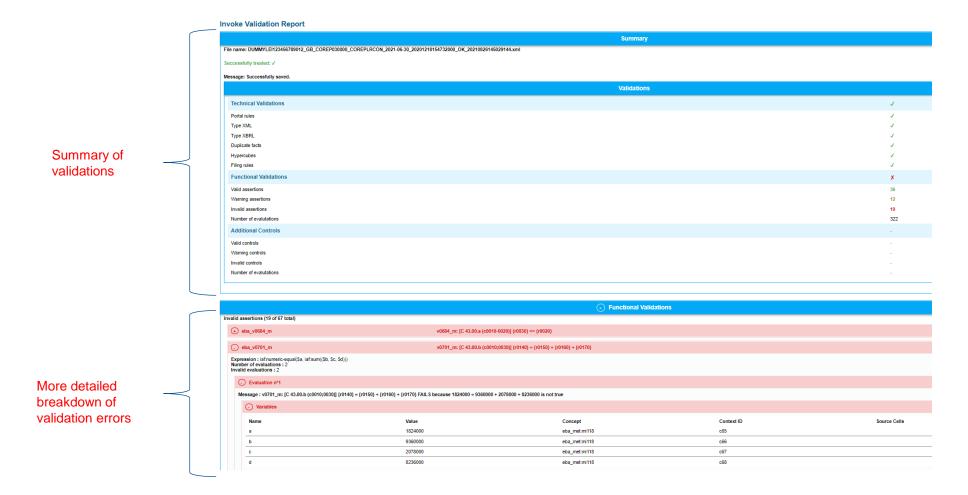


- Submitting reports by completing forms manually
- This is recommended for use only with a small number of forms



#### Validation feedback / HTML

Preliminary example





#### Validation feedback / Excel (summary of validation errors)

C0001 - Nature of Report (COREP)

C4700 - Leverage ratio calculation

C4400 - General Information

C4000 - Alternative treatment of the Exposure Measure NOK

C4300 - Breakdown of leverage ratio exposure measure NOK

C4801 - Leverage ratio volatility: mean value for the re WARNING
C4802 - Leverage ratio volatility: daily values for the re WARNING

Preliminary example

Report identifying information

Summary of validation entities and their validation status

Summary of the forms contained in the report and their validation status

Overview	Value
Identifier	DUMMYLEI123456789012
Period	2021-06-30
Schema reference	http://www.eba.europa.eu/eu/fr/xbrl/crr/fws/corep/its-005-2020/2020-11-15/mod/corep_lr_con.xsc
Denomination	Dummy
File Name	DUMMYLEI123456789012 GB COREP030000 COREPLRCON 2021-06-30 20201218154732000.xbrl
Validation	Status
XBRL 2.1	OK
XML Schema 1.1	OK
XBRL Dimensions 1.0	OK
Duplicate Facts	OK
XBRL Calculation	OK
Formula 1.0	NOK
Filing rules	WARNING
Document	Status

OK

NOK

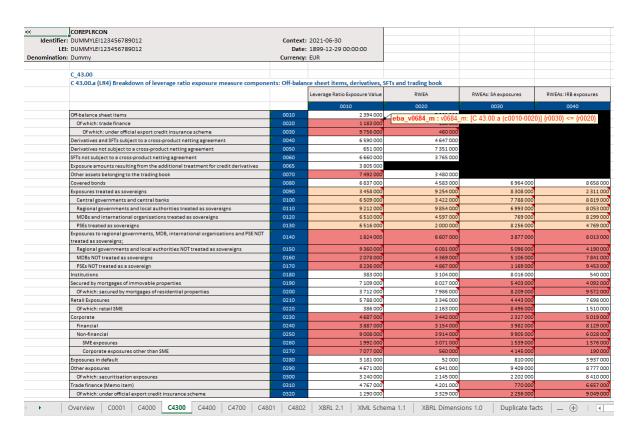
#### Validation feedback / Excel (validation errors in list format)

Preliminary example

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		FALSE		eba_v0705_m	Error		iaf:numeric-equal(\$a, iaf:sum((\$b, \$c)))	1- \$find:tC_43.00.b
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#### Validation feedback / Excel (validation errors in form format) Preliminary example



- Reported figures visually on forms
- Data points containing errors visualised with colours (e.g. error => red)
- Validation errors appear in the upper corner of the cell

#### Validation feedback / XML

#### Preliminary example

```
<?xml version="1.0" encoding="UTF-8"?>
<invokeportalaction>
<succeeded>true</succeeded>
                       <message>Successfully saved.</message>
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Intended for download to own reporting system

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<a txfx::assertion validated="true" evaluationTime="0,00s" severity="ERROR" name="eba_v0683_m" evaluationCount="2" expression="laf:numeric-less-equal-than($a, $b)" description="v0683_m: [C 43.00.a (c0010-0020)] {r0020} <= {r0010}.</p>
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  <ixfxr:precondition test="$find:tC_43.00.a"/>
</ixfxr:preconditionList>
                          "(1011) Pleasantonia (1011) Pleasantonia (1011
cirfxr:value cells="C4300:D12" decimals="-3" concent="eba_met:mi265">9756000
                                                          detyratisle name="b">
- chelicontext contextd="c92">
- chelicontext=- contextd="c92">
- chelicontext=- c
                                      cixfx::evaluation validated="false" message="v0684_m: [C 43.00.a (c0010-0020)] {r0030} <= {r0020} FAILS because 460000 <= 180000 is not true" index="2".
                                               <ixfxr:variable name="a">
- <ixfxr:fact index="1">
                                                                                      - <xbril:entity> <xbril:identifier scheme="http://standards.iso.org/iso/17442">DUMMYLEI123456789012 </xbril:identifier>
                                                                                                          <xbr/>trii:instant>2021-06-30</xbrii:instant>
```

### Questions submitted in advance Jussi Eronen



#### **Questions from reporters**

- Can XBRL files be uploaded to the portal as they are and can tables and figures browsed there and reports validated?
  - Files can be uploaded to the application, for example with the drag-and-drop function
  - It is possible to browse a submitted report
  - A submitted report can be downloaded in Excel format to the reporter's own workstation
  - A file is validated immediately after it is submitted. Feedback on a report comes after validation
  - The test environment can and should be used to validate a report before the report is submitted
- In addition to browsing, it is possible to use the system to correct reports/tables and to change and enter figures in them?
  - In web forms this is possible, but in other options it is not (uploading report, A2A)
- Is caching possible and is there a test environment where the report is validated or directly in production?
  - In web forms, caching is possible
  - The test environment can and should be used to validate a report before the report is submitted



#### **Questions from reporters**

- Does the Portal update subtotals of tables, etc. in real time, such as e.g. workbooks at present?
  - There are no plans for web forms to calculate subtotals.
- Is encrypted XBRL included in the system and do reporters have to attend to XBRL encryption themselves and/or does the FIN-FSA provide tools for this?
  - There is no need to encrypt reports.



#### **Discussion**



Questions related to the new system can be sent to the address

NewReportingSystem@fiva.fi



# Thank you!



#### **Abbreviations**

- **AE** = Reporting of asset encumbrance
- AIFMD = Reporting of Alternative Investment Fund Managers
- **ALMM** = Common Reporting Framework, Additional liquidity monitoring metrics
- **COREP OF** = Common Reporting Framework, Own funds
- **COVID-19** = Additional reporting due to COVID-19 situation
- CSDR 7 & 9 = ESMA reporting, Central Securities Depositories Regulation art. 7 & art. 9
- **DPM** = Data point model for reporting, published by EBA and EIOPA
- FA & FT = FINREP reporting annex tables
- **FINREP** = Financial Reporting
- **FP** = Reporting on funding plans
- FRTB = Common Reporting Framework, Fundamental Review of the Trading Book
- **GSII** = Additional reporting for identification and determination of G-SII buffer rates
- **IF** = Capital adequacy reporting of investment firms
- **JM** = Reporting of unemployment funds, Membership fee calculation
- KA = Reporting of sickness funds, Income statement and balance sheet
- **KB** = Reporting of unemployment funds. Income statement and balance sheet tables
- **KP** = Reporting of mortgage banking activities
- **KT** = Unemployment fund statistics
- LCR DA = Common Reporting Framework, Liquidity Coverage Ratio Delegated Act

- LE = Common Reporting Framework, Large Exposures
- LTC = Calculation of maximum loan-to-value ratio
- LR = Common Reporting Framework, Leverage Ratio
- **MA** = Reporting of payment institutions, submission of supervisory data based on financial statements and accounting
- **MF** = Reporting of payment institutions, Fraud data related to reporting services
- MJ = Reporting of payment institutions, lending and non-performing assets
- **ML** = Payment transactions statistics
- MMF = Reporting of Money Market Funds
- **MU** = Reporting of payment institutions, large exposures
- MV = Reporting of payment institutions, own funds and capital adequacy
- NSFR = Common Reporting Framework, Net Stable Funding Requirement
- R = Reporting of interest rate risk
- RA = Risk assessment survey
- **REM HE** = Reporting of high earners
- **REM BM** = Remuneration Benchmarking
- RVA = Capital adequacy reporting of financial and insurance conglomerates
- S = Reporting of state of banking system
- SBP CR, RM & IMV = Comparison of internal approaches used for calculation of own funds requirements
- SFTP = SSH File Transfer Protocol

- VA = Insurance institutions' income statement and balance sheet
- **VB** = Insurance institutions' financial statement attachments
- **VC** = Reporting of non-life and life insurance companies. Key indicators
- **VD** = Solvency of insurance institutions
- **VE** = Reporting of non-life and life insurance companies, technical provisions
- **VF** = Insurance institutions' assets covering technical provisions
- VG = Insurance company investments
- VJ = Analysis of occupational accident and sickness insurance
- VK = Statement of life insurance company business
- VL = Inquiry for industry-wide pension funds and company pension funds
- VM = Insurance company statistics
- VN = Statistical survey of motor liability insurance
- **VO** = Pension insurance biannual information
- **VP** = Survey of the result of the technical reserves of pension insurance
- **VS** = Calculation of solvency limit and investment diversification of pension institutions
- VT = Statistical survey of patient insurance
- **VQ** = Reporting of insurance brokers
- XBRL = Taxonomy on technical specifications for reporting, published by EBA

