Instructions on the SRB QnA process for Resolution Reporting

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Summary of Changes:
The table below summarises any changes to the QnA process following the initial publication on November 6th 2019.

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Part I: General Guidance on QnA Process

1. **Background**
   In an effort to improve the quality and efficiency of the data collection process for Resolution Reporting, the SRB has decided to give banks and NRAs the opportunity to raise questions on the data collection directly with the SRB, throughout the data collection cycle. The link to the QnA tool is on a dedicated page on the SRB website.

2. **Target audience**
   The purpose of the QnA is to provide clarity on the reporting requirements to banks under the SRB remit. As such feedback will be targeted to questions from institutions subject to the resolution reporting requirements and National Resolution Authorities (NRAs).

3. **Creating a user profile**
   To raise questions or review previous questions and answers, the submitter first needs to click on the link to the QnA process on the SRB website and request login details by connecting to https://iam.srb.europa.eu. Once there, please click on the “User Account – Self Registration” link.

   Fill in the form by making sure you enter the correct Organization, Reason (it’s important to specify!) and Employee Type (please chose ‘Other Advisor’ if you cannot find yours).

   Then just follow the instructions you will receive in your mailbox.

   **Submitters are encouraged to create their profile using their professional email address**, as this will enable the SRB to better identify questions from Institutions and NRAs.

   Once created, this profile enables the submitter to follow up on the status of questions raised and receive notifications of the status of the question raised.

   (Note that the confirmation email and/or the notification of feedback on your question may have been sent to the Spam folder of your mailbox).

4. **QnA scope**
   When raising a question, a predefined list of topics is available in the QnA form to structure the nature of questions that can be raised via this platform. In general, questions may cover the reporting format, content (Guidance documents published by the SRB) and process for Resolution Reporting. Please address any questions on Guidance documents and reports published by other authorities directly to these authorities. Questions addressing policy will not be dealt with in this QnA process.
5. **Delay for SRB Feedback**

In general, the SRB will provide feedback between 2 to 4 months maximum after the submission of the question. The clearer the drafting of the questions raised, and the more background information provided on the questions, the better the chances of receiving a quick response from the SRB.
Part II: Specific Guidance on QnA Form

An asterisk in the QnA form identifies mandatory fields (*).

Before raising questions, submitters are strongly advised to check that a similar question has not already been submitted with the corresponding feedback.

Once a submitter has raised a question and filled in the template, his/her user details are saved in the template for future questions. These personal details will not be published.

1. **Summary**
The submitter should provide a clear indication of the scope of the question being raised.

2. **Country**
The location of the submitter.

3. **Type of Organisation**
Choice between two options: NRA & NCA, or Institution (credit institution, investment bank).
   - If the submitter is an “Institution”, the submitter will also have to specify the **banking group** to which he/she belongs. If the name of the banking group is not yet available in the pre-defined list, the submitter may choose “Other”.
   - If the submitter is a “National Competent Authority - NCA” or “National Resolution Authority - NRA”, the submitter will also have to specify the country that they represent. If their country is not available in the pre-defined list, the submitter may choose “Other”.

4. **Language**
Questions may be raised in any of the official languages of the European Union Member States. Please note, however, that questions raised in a language other than English will result in a delayed response because of the need for translations.

5. **Resolution Reporting Subject Matter**
To facilitate the efficient processing of questions, submitters should specify the subject matter to be covered from a pre-defined list of topics and sub-topics.

6. **Background**
The submitter should provide any relevant background information that would put the question in the right context, and facilitate the analysis of the question by the SRB.

7. **Question**
Here the submitter details the question to be raised to the SRB. The question should be concise and to the point. Hypothetical questions should be avoided. Questions should refer to the current reporting cycle (process, guidance, reporting framework).
8. **Client Suggested Answer**
If the submitter has an answer in mind, but is unsure of it, this should be shared with the SRB as it may accelerate the feedback process.

9. **Attachments**
The submitter has the option of providing an attachment, (a practical example, a screen shot of the issue, an error message received etc). The following file types are acceptable: .zip, .xlsx, .jpeg, .pdf, with a maximum file size of 10MB.

10. **Status of Request**
Once the submitter has sent the question to the SRB, he/she may follow up on the progress of their request once logged in to the QnA process. The status of questions raised is indicated next to each of the submitter’s questions, and is visible only to the submitter. The status can be:

- **Pending** – question received and being investigated by the SRB
- **Cancelled** – either the SRB or the submitter may cancel a question before it is finalised, example if the answer was already provided or the submitter no longer finds the question relevant.
- **Responded/Public** – the status becomes "Responded/Public" when the SRB has provided feedback, at which point the SRB considers the question to be closed.

At each of the stages mentioned above, the submitter is notified by email of a change in the status.

Should there be a need for clarification, a comment may be sent by the SRB to the submitter, which will be visible in their profile. The submitter therefore has the possibility of updating the question submitted with a comment.

Once finalised, answers are visible both in the submitter’s profile and in the “Access to previously raised questions” for the QnA.

Note that **personal details of the submitter (Name, email address, Organisation, Country) will not be published in the QnA archives.** The submitter should avoid stating bank details such as the name of the reporting entity in the question, as questions are published as submitted to the SRB. Attachments sent with questions will not be made public.

**Part III: QnA Archives**

On the [home page](#), the submitter can access the previous questions raised by other submitters for which answers have been provided by the SRB.

Users only need to log in once to the SRB to view either the archives or to raise a question.

Searches can be narrowed down by specifying key words in any of the available search fields.
Part IV: Data Privacy Statement

Regulation (EU) 2018/1725 (herein after "the Regulation") applies to the processing of personal data carried out in the process of the Resolution Reporting Question and Answer process (herein QnA process).

The SRB hereby provides you as the data subject with the following information:

- The controller is the internal team designated as being in charge of the particular processing operation within the SRB is the Resolution Reporting Working Group.

Person designated as being in charge of the processing operation: Head of ICT.

Email: info@srb.europa.eu

- The purpose of the processing is to operationalise the QnA process, such that questions from the target audience (Institutions and NRAs) may be prioritised over other categories of submitters, on the basis of their professional email address and the identification of the organisation to which the submitter belongs.

- The categories of data collected and used for the processing operations are limited to administrative data (Surname, First Name, Locality, Year of birth, mobile and fixed telephone numbers, email address and organisation).

- The recipients and/or categories of recipients are ICT staff managing the process and resolution experts analysing the questions raised and providing feedback.

- The controller has no intention of transferring your personal data to third parties or to international organisations.

- Your rights with respect to your data: You have the right to request from the access to and rectification or erasure of personal data or restriction of processing concerning your data or, where applicable, the right to object to processing or the right to data portability; for this purpose, please contact the Head of ICT. You may send an E-mail to: info@srb.europa.eu.

- The right of rectification can only apply to factual data processed.

- The time limits for storing the data are the following: the data will be stored for one year or beyond, i.e. as long as the participants maintain their registration for the QnA process and do not request the SRB to delete their data.

- The SRB Data Protection Officer is at your disposal for any clarification on your rights under Regulation (EU) 2018/1725, e-mail: SRB-DPO@srb.europa.eu.

- You also have the right to lodge a complaint with the European Data Protection Supervisor (EDPS) edps@edps.europa.eu.