Risk Data Aggregation



An Opportunity to transform Processes

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- European Athorities Expectation about Data
- My Understanding of Regulator Approach
- What we are doing on BCBS239



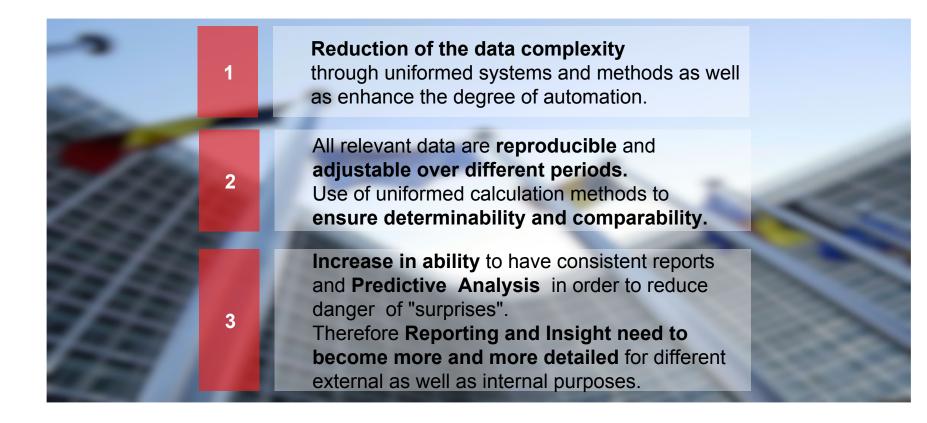


Key Point

European authorities have clearly defined expectations

on data quality and reporting capabilities (e. g. SREP, BCBS 239, ILAAP, ICAAP). Furthermore ECB will assesses Financial institution on their sustainability of Business Model and Strategy by Scoring Banks into Peers Group (from 2016 on)

European Authorities Expectation (1/2)



European Authorities Expectation (2/2)

All information in a controlled environment

GOVERNANCE

WEB PORTAL

CORE ANALYSIS

"We want to have a clear and standard view of the bank on an ongoing basis"

INSIGHT & PREDICTION

We want to check the impact of the crisis on banks and on the spending capacity of the family of the client, and to fine tune the business model

OUR CORPORATE FEDERATED DATA

All the information relevant for us and for the Regulators, to be properly modeled when supporting standard processes, when requiring time depth and when enrichments with internal methods are requested

STANDARD MODELED BANKING DATA

Our core business, as represented and modeled in our business applications

EXTERNAL INTERNET

Any information moving around our world, that could potentially impact the decisional

My Understanding of Regulator Approach

...with the Holding company providing Group's coordination and steering on **Governance**, **Data Aggregation and Reporting Processes**.

- Governance processes: all Legal entities relevant for risk management purposes have to apply the same framework based on common procedures for collecting and aggregating risk data, as well as on shared practices for risk taxonomies and reporting. The overarching framework, defined in the GP "Risk Data Aggregation and Risk Reporting practices", has been progressively integrated with operative guidelines (Group process regulations), risk taxonomies, validation procedures as well as Data Quality and Data Management principles.
- Data Aggregation processes: group-wide IT platforms have been gradually enriched in terms of geographical coverage, in order to have granular cross-Legal Entities risk data and attributes necessary for the group risk consolidation purposes.
- Reporting processes: The identification of "BCBS239-relevant reports" has been completed to those produced at Holding Company level to monitor and manage risks from a consolidated perspective. These are based on homogeneous risk metrics throughout the Group, coherently with the Group's risk taxonomies.

What we are doing on BCBS 239 Organizational set up and Group Legal Entities included in the Perimeter

		Key pillars covering the 87 BCBS239 Principles	Compliance Key deliverables 2015 YE	Additional Activities
: & RISK ROCESSES	1	RDA&R GLOBAL PRINCIPLES	Issuance of a Group risk data aggregation and risk reporting framework at HC level	Implementation of the Framework by all relevant Group's subsidiaries
		STANDARDS OF RDA & REPORTING	Issuance of Group standards describing the phase of the risk reporting production process for the relevant risk reports	Implementation of Group standards , by all relevant Group's subsidiaries
ERNANCE EMENT PF	3	GROUP RISK DATA TAXONOMIES	Definition of Group Risk T axonomies for each risk area. Mapping of Credit Risk Critical Data Elements vs. Golden Sources	Implementation of Group Risk Data Taxonomies by all relevant Group subsidiaries. CDE Mapping vs Golden Sources for Liquidity Risk and IRR
GOVE	4	CERTIFICATION PROCESS & DQ CONTROLS	Issuance of a Policy defining overarching Principles of Data Quality	Issuance of a Group Process Regulation (GPR) defining Data Quality processes. Implementation of Data quality framework, for relevant risks, at local
MA	5	INDEPENDENT VALIDATION	Issuance of a Risk Reporting Validation Framework , to be applied to the relevant risk reports.	level Roll out of the framework in order to cover all the reports in scope

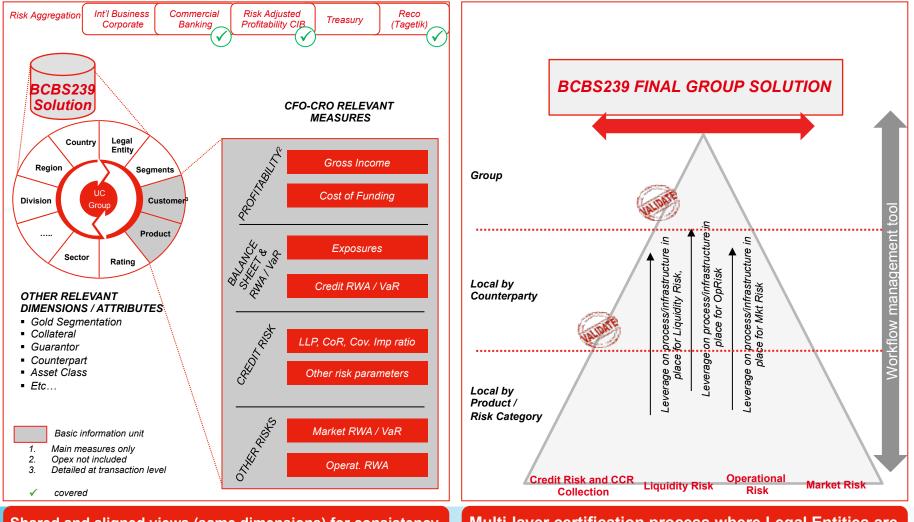
BCBS239 Compliance Model (1/2)

	-	Key pillars covering the 87 BCBS239 Principles	Compliance Key deliverables 2015 YE	Additional Activities	
RISK DATA MANAGEMENT	6	FLEXIBILITY	Enhancements of the existing risk information base thus allowing to retrieve data at a higher level of granularity for Credit Risk	Development of the Group application (in order to retrieve Interest Rate Risk granular data) and of Liquidity Reporting Tool	
	7	COMPLETENESS	Increased coverage of credit risk information base (geographies and dataset). Group-wide liquidity risk platform implemented allowing official reporting as requested by Basel III	Enhancement of the risk information base for credit risk, CCR and IRR	
	8	RECONCILIATION	Reconciliation activities Credit Risk vs COREP and diagnostic COREP vs FINREP	Reconciliation of Credit Risk vs Balance Sheet. Reconciliation of IRR and Liquidity Risk with official accounting sources	
	9	TIMELINESS	Timely availability of needed risk granular/aggregated data within the source systems and in line with requirements defined in the standards of RDA & reporting (in normal and stress conditions)		
	10	RISK INTEGRATION	Definition of integrated risk reporting process; Granular integration of risk where relevant (credit, issuer, CCR); Set up of reporting layer	Enhancement of the Integrated risk reporting process. Increased usage of Reporting Layer for Credit and Liquidity risks.	

BCBS239 Compliance Model (2/2)

MAIN MEASURES AND DIMENSIONS AVAILABLE

CERTIFICATION PROCESS FROM LES TO GROUP



Shared and aligned views (same dimensions) for consistency of coordinated and integrated F&R reporting Multi-layer certification process where Legal Entities are in charge to contribute certified/reconciled data

BCBS239 Process Overview

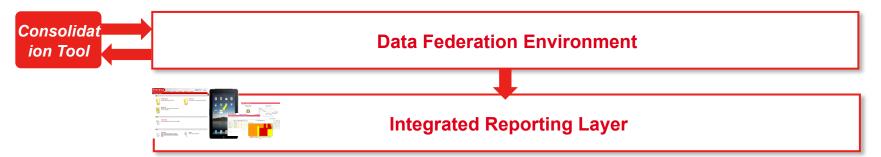


- Data Perimeter related to business line, product line, recasting, Risk adjusted profitability in Local MIS / Group MIS
- Data Perimeter of credit risk portfolio in Credit Risk Platform

UniCredit	Regional coverage		
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Data Orchestration

Example for BCSB239 Credit Risk Stream

The "compliant zone" is an never-ending journey