



OPERATIONAL GUIDANCE FOR BANKS ON THE MEASUREMENT AND REPORTING OF THE LIQUIDITY SITUATION IN RESOLUTION

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Abbreviations

BaU	Business as Usual
BU	Banking Union
ECB	European Central Bank
EfB	SRB's 'Expectations for Banks'
IRT	Internal Resolution Team
FMI	Financial Market Infrastructure
KLE	Key Liquidity Entity
LSI	Less Significant Institution
MIS	Management Information Systems
MPE	Multiple Points of Entry
MoU	Memorandum of Understanding
NRA	National Resolution Authority
PRS	Preferred Resolution Strategy
RPC	Resolution Planning Cycle
SI	Significant Institution
SRB	Single Resolution Board
SPE	Single Point of Entry
SSM	Single Supervisory Mechanism

1. Introduction¹

- 1 The SRB has outlined the actions that banks under its remit are expected to undertake to ensure an appropriate level of resolvability in light of the Expectations for banks² (hereinafter 'EfB').³ This guidance focuses on the second principle '**Measurement and reporting of the liquidity situation in resolution**' (hereinafter 'Principle 3.2') of the liquidity dimension of the EfB aiming at enhancing banks' resolvability and preparedness for a potential resolution. In meeting these expectations, banks are expected to leverage on capabilities already developed under the two phased-in liquidity principles, namely: Principle 3.1, 'Estimation of liquidity and funding needs in resolution'⁴; and Principle 3.3, 'Identification and mobilisation of collateral during and after resolution'⁵.
- 2 In line with the scope of the EfB, this operational guidance concerns banks within the SRB's direct remit⁶, for which the strategy is resolution. The operational guidance may be adapted to individual specificities based on a dialogue between each bank and its internal resolution team (hereinafter 'IRT'), taking into account the proportionality principle and specificities related to the business model of the bank. Banks may be expected to provide information and analysis on specific topics in addition to this guidance that is necessary for the purposes of drawing-up and implementing resolution plans.
- 3 Banks are expected to build EfB capabilities for a steady state of resolution planning by 31 December 2023. As such, banks are expected to fulfil the expectations under Principle 3.2 of the liquidity dimension during 2023.
- 4 According to Principle 3.2, banks are expected to establish processes and develop capabilities to measure and report their liquidity and funding needs in case of resolution. To that end, banks are expected to demonstrate that they are able to measure and report their liquidity position at short notice and with a high level of frequency⁷.

¹ DISCLAIMER: This publication is not intended to create any legally binding effect and does not in any way substitute the legal requirements laid down in the relevant applicable European Union (EU) and national laws. It may not be relied upon for any legal purposes, does not establish any binding interpretation of EU or national laws and does not serve as, or substitute for, legal advice. The SRB's guidance is subject to further revisions, including due to changes in the applicable European Union (EU) legislation. The SRB reserves the right to amend this publication without notice whenever it deems appropriate and it shall not be considered as predetermining the position that the SRB may take in specific cases, where the circumstances of each case will also be considered.

² The Expectations for Banks are published [here](#) on the SRB website.

³ Chapters 1 to 3, excluding chapter 3.2, of this guidance apply to entities falling under the direct remit of both the SRB and the ECB (Article 7(2)(a) of the SRMR). Any reference to 'banks' or 'entities' included therein is to be deemed as a reference to the aforesaid entities only. The expectations for other cross-border groups (Article 7(2)(b) of the SRMR) will be covered in chapter 3.2 of the guidance.

⁴ The SRB Operational Guidance note for Principle 3.1 is published [here](#) on the SRB website.

⁵ The SRB Operational Guidance note for Principle 3.3 is published [here](#) on the SRB website.

⁶ This also includes hosted banks that are not identified as resolution entities, i.e. banks that are subsidiaries of groups established outside the Banking Union with an SPE group resolution strategy.

⁷ Definitions of short notice and high level of frequency are provided in section 2.

5 The guidance focuses on **three objectives**:

- a. the expectation that banks' internal frameworks, governance and management information systems (MIS) are set up to meet the data expectations set out in this guidance, including the ability to forecast the net liquidity position across time periods and at short notice (Sections 2.1 and 2.2);
- b. the expectation that banks under the direct remit of both the SRB and of the ECB (Article 7(2)(a) of the SRMR) have developed the capabilities to report a predefined set of data points on their liquidity situation (hereinafter 'Joint Liquidity Template', Section 2.4);
- c. the expectation that banks have put in place remedial actions to mitigate any deficiencies in their capabilities to provide these data points at the requested level of consolidation and at a high level of frequency (Section 2.3).

6 The liquidity section of the annex to the priority letter provided details on what deliverables are expected from banks in 2023 in this area. This guidance is meant to complement the content of the EfB and the annex to the priority letter.

7 Under the Memorandum of Understanding between the SRB and the ECB (hereinafter 'MoU')⁸, the SRB and the ECB have agreed to cooperate closely on the topic of measurement and reporting of liquidity. The objective is to create synergies, to avoid an unnecessary increase in banks' reporting burden and to build on existing supervisory processes.

8 While the SRB and the ECB have agreed to cooperate on the topic of measurement and reporting of liquidity, it is of note that the scope of entities under their respective direct remit differs. When the scope of entities under their respective direct remit differs, as with the other cross-border groups under Article 7(2)(b) of the SRMR (hereinafter 'other cross-border groups'), the ECB and the SRB may make use of a template mirroring the Joint Liquidity Template and request it from these entities independently of each other⁹.

9 In particular, the SRB has agreed with the ECB to conduct a joint data collection exercise in 2023¹⁰ (Deliverable 2a), which will leverage on previous annual liquidity exercises of the ECB. Due to the nature of this joint exercise, the template and the related reporting instructions are communicated separately to this guidance by the SRB and the ECB to the banks under the direct remit of both the SRB and of the ECB (Article 7(2)(a) of the SRMR).

10 In the case of Banking Union (hereinafter 'BU') subsidiaries of banking groups established outside the BU (hereinafter 'host banks') with a Single Point of Entry group resolution strategy (hereinafter 'SPE'), the SRB expects them to demonstrate whether they meet the expectations under EfB Principle 3.2 and this guidance. Thus, these subsidiaries are expected to necessarily establish local capabilities that comply with EfB Principle 3.2.

⁸ Published [here](#) on the SRB website.

⁹ In such cases the reporting modalities will be communicated to the bank by ECB or SRB respectively.

¹⁰ Any reference to the agreement between the SRB and the ECB on the topic of measurement and reporting of liquidity is to be understood only as referring to entities falling under the direct remit of both the SRB and the ECB (Article 7(2)(a) of the SRMR) throughout the document. Any such reference does not also include other cross-border groups (Article 7(2)(b) of the SRMR), as they do not fall under the direct remit of the ECB.

2. Capabilities for measurement and reporting liquidity in resolution

- 11 In order to ensure an adequate response during a crisis, banks' capabilities to measure and report their liquidity and funding needs as well as their liquidity sources are key for the banks' resolvability. Banks are expected to demonstrate their resolvability by the end of 2023, by developing the necessary policies, processes, validation procedures and MIS capabilities.
- 12 Past crisis cases have shown the importance of receiving liquidity data at resolution group level as well as at individual level for key liquidity entities (hereinafter 'KLEs') including for all material currencies and with a high level of frequency. Banks are expected to develop the relevant capabilities to be able to deliver accurate information at the requested level of granularity, and frequency as specified in the Joint Liquidity Template.
- 13 For the purposes of this guidance:
 - a. KLEs and material currencies are to be understood as defined in the operational guidance for Principle 3.1¹¹;
 - b. High frequency is defined as intraday¹². At a minimum, banks are expected to develop the capability to measure and report their liquidity position more than once a day¹³;
 - c. Short notice is defined as at maximum of 24 hours prior to reporting.
- 14 Banks are expected to develop the capability to measure and report their liquidity position at resolution group level and for reporting relevant KLEs¹⁴. In line with the proportionality principle, banks may request an exclusion or a (sub) grouping of certain KLEs based on duly justified considerations. Any exclusion or a (sub) grouping of KLEs can only be made in consultation with the IRTs.
- 15 As resolution actions could have consequences on the structure of the group (for example in the case of transfer tools, which can potentially separate entities or decision-making bodies involved in the approval processes of the Joint Liquidity Template), banks are expected to ensure the proper functioning of liquidity measurement and

¹¹ The SRB operational guidance note for Principle 3.1 is published [here](#) on the SRB website.

¹² In this guidance note, intraday refers to the frequency of reporting, rather than intraday liquidity indicators. As part of Deliverable 2a (Deliverables 1, 2a and 2b are to be understood as specified in the Annex to the Priority Letter 2023) and during a crisis, the relevant reporting frequency will be communicated to banks in cooperation with the ECB.

¹³ Data-points identified for intraday reporting are a subset of the information contained in the Joint Liquidity Template.

¹⁴ As part of Deliverable 2a and during a crisis, the relevant reporting scope will be communicated to the banks by the relevant IRT in cooperation with the ECB. Although the reporting scope for Deliverable 2a may include a subset of KLEs, banks are nonetheless expected to be in a position to report at the level of relevant KLEs, as agreed with the IRTs.

reporting in all phases of resolution¹⁵. In that respect, banks are also expected to perform an assessment of any difficulty in measurement and reporting that could arise in connection with the execution of the preferred resolution strategy (hereinafter 'PRS'). For banks under the multiple point of entry (hereinafter 'MPE') strategy, each resolution group located in the BU is expected to develop the capabilities to report the Joint Liquidity Template at each resolution group level and at individual KLE level, including for material currencies, at short notice. This capability to produce the Joint Liquidity Template is expected to be independent from other resolution groups in order to avoid the reduction of this capability in case of separation of one resolution group from the others.

2.1. Governance structure and internal framework

- 16 Governance has been defined as one of the seven dimensions of resolvability in the EfB¹⁶. Banks are expected to assess whether the capabilities developed in the implementation of the governance principle are also applied when it comes to the implementation of Principle 3.2. The objective is for banks to put in place the necessary internal framework and governance structure, including but not restricted to quality assurance processes, to measure and report their liquidity position during resolution.
- 17 Banks are expected to leverage on work already performed as part of Principles 3.1 and 3.3, as well as on processes and policies developed for supervisory purposes.
- 18 Banks are expected to ensure that the governance arrangements and internal framework related to the measuring and reporting of the liquidity situation:
- can support the execution of the resolution process;
 - are suited for the specifics of a resolution scenario; and,
 - would be able to address any difficulty in measurement and reporting that could arise in connection with the implementation of any potential measure that could separate the entities in the group.

2.1.1. GOVERNANCE STRUCTURE

- 19 Banks are expected to demonstrate their capability to measure and report their liquidity situation in resolution in a timely manner. In particular, banks are expected to demonstrate that governance arrangements are in place to enable them to produce, validate/ perform quality assurance, approve and report the information requested in the Joint Liquidity Template at the requested level of consolidation (at the resolution group level and at individual KLE level, including for material currencies) and frequency.
- 20 Banks are expected to have established clear lines of responsibility so that information on the liquidity situation of the bank in a crisis scenario is reported efficiently and without undue delay, and that strategic decisions based on such information are communicated clearly to all relevant stakeholders within the group (e.g. senior

¹⁵ Phases of resolution are to be understood as defined in the Operational Guidance for Principle 3.1 published on the SRB website, Paragraph 5 Box 1, and are: 'the run-up to resolution', 'the resolution day/ week-end' and 'the stabilisation phase (weeks/months following the resolution day/weekend)'.

¹⁶ Principles 1.1 (Active involvement of management body and senior management), 1.2 (Governance for resolution activities), 1.3 (Quality assurance and internal audit) and 1.4 (Testing and operationalisation of the strategy)

management, recovery and resolution committees, asset-liability committees, etc.). Banks are expected to incorporate the measurement and reporting of liquidity risks in resolution into their internal crisis management frameworks.

- 21 Banks are expected to document the roles and responsibilities of those involved in the measurement and reporting of liquidity in resolution, the related quality assurance, approval and escalation processes, as well as the pertinent timeframes for individual steps in the reporting process. To this end, banks are expected to identify and document:
 - a. teams, departments and committees (pre-existing or specifically designed) within the bank (including intragroup services) that will be involved in the measurement and reporting of liquidity in resolution¹⁷. Banks are expected to describe the links and cooperation between the above mentioned units;
 - b. a list of the roles and responsibilities of the above-mentioned units (and to the extent possible staff) involved in the overall production and ultimate delivery of the liquidity information during resolution. In that respect, banks are expected to ensure that they are adequately staffed (e.g. that they have considered alternates/back-ups, in case the main person responsible was not available or was engaged in other bank processes at the time of the crisis¹⁸);
 - c. the overall governance set-up, including processes, decision-making timeframes, reporting lines, escalation and formal approval mechanisms, with a clear allocation of responsibilities. The interplay with the relevant external stakeholders (e.g., SRB, NRAs, SSM, FMI providers, etc.) is also expected to be clearly defined;
 - d. whether any of the processes related to the measurement and reporting of liquidity are outsourced.
- 22 As a resolution action could have consequences on the structure of the group, banks are expected to provide information on the level of centralisation and coordination involved in their liquidity measurement and reporting, and overall how this function will be ensured given the application of the PRS and corresponding resolution tool(s)¹⁹.
- 23 Banks are encouraged to provide documentation on these arrangements by using flowcharts and diagrams which clearly visualise the interaction between the different actors/stakeholders, departments and committees that will be part of the overall liquidity measurement and reporting governance structure during resolution.
- 24 Banks are expected to align the above mentioned documentation with the deliverables and/or information submitted under EfB Principles 3.1 and 3.3 and, where appropriate, with information provided in the ILAAP, contingency funding plan and recovery plan.
- 25 Banks are expected to update the SRB promptly about any material changes to their governance structure, internal framework and the operational set-up of their MIS systems which may have an impact on the banks' capabilities to measure and report liquidity in resolution.

¹⁷ In particular internal staff, systems owners and teams responsible for delivering, consolidating and validating the data points specified in the template.

¹⁸ If the provision of other resolution related data (e.g. extraction of bail-in related data) makes use of the same resources, banks are expected to highlight this when providing the information.

¹⁹ See also paragraph 15.

2.1.2. INTERNAL FRAMEWORK AND DATA QUALITY

- 26 The quality of the data submitted by banks plays a key role in a crisis, ensuring an adequate response and management of the crisis by the authorities. Thus, banks are expected to demonstrate that internal control and quality assurance processes are in place to ensure the accuracy and completeness of the data reported in the Joint Liquidity Template. Banks are expected to ensure alignment with the definitions set in the reporting instructions for the Joint Liquidity Template.
- 27 In this context, banks are expected to provide information on the data quality standards they have put in place to ensure the identification of any deficiencies in the completeness, accuracy, integrity and timeliness of the data reported in the Joint Liquidity Template. Banks are expected to ensure the consistency of the internal and external data used in the calculation of liquidity indicators (e.g., survival period, LCR) reported in the Joint Liquidity Template.
- 28 Banks are expected to assess whether the internal framework in place is adequate to ensure the data quality necessary for the measurement and reporting of the liquidity position in resolution.

2.2. MIS capabilities to meet data requirements

- 29 Banks are expected to develop the necessary MIS capabilities enabling them to report the Joint Liquidity Template at the required level of consolidation (at the resolution group level and at individual KLE level, including for material currencies) at short notice and at a high level of frequency.
- 30 As MIS developments require implementation time, it is vital that such capabilities are developed and demonstrated ex-ante in a business-as-usual (hereinafter 'BaU') situation, so as to provide sufficient confidence that these capabilities can be efficiently employed should a crisis arise. In order to decrease the reporting burden on banks, the format and data-points requested for the implementation of this principle are founded on the existing SSM liquidity template (see Section 2.4).
- 31 Where possible, banks are also expected to leverage on capabilities developed as part of their work on MIS capabilities for other resolution-related purposes.
- 32 Banks are expected to identify and document the systems, applications and tools necessary for the measurement and reporting of liquidity for the required scope as referred to in paragraph 29. These processes are expected to be automated, in order to ensure banks' readiness to provide data at short notice in a crisis. If manual processes are applied, banks are expected to document them and apply quality assurance.
- 33 Banks are expected to have put in place internal documentation, guidelines and policies to document the data generation process that would also be adequate in a resolution scenario.

- 34 In particular, it is expected that banks document:
- a. the level of automation and degree of manual intervention necessary in producing the data²⁰;
 - b. the time needed to produce the data and how frequently they are able to update this information (either automatically or manually);
 - c. any reconciliations and validations performed as part of the data quality assurance process;
 - d. the internal procedures and data sources used in the generation of the Joint Liquidity Template.
- 35 Banks are expected to classify the stakeholders involved in the measurement and reporting of the Joint Liquidity Template that have been identified as relevant staff²¹.

2.3. Identified obstacles and remedial actions

- 36 Banks are expected to identify any obstacles to reporting any of the data points related to the Joint Liquidity Template at the frequency and scope requested and to define any remedial actions where necessary (Deliverable 1 and Deliverable 2b).
- 37 Where necessary, banks are expected to specify whether obstacles are related to:
- a. reporting the data at the level of specific resolution group(s) or KLEs;
 - b. reporting the data in each material currency;
 - c. the requested reporting frequency (per asset type, if justified);
 - d. the availability and reporting of particular data points;
 - e. MIS capabilities;
 - f. governance arrangements and internal framework; etc.,
- and establish any remedial actions needed to address the obstacles they have identified.
- 38 Should remedial actions be necessary, banks are expected to:
- a. assign a person responsible for the implementation of the remedial action;
 - b. specify a timeline with concrete milestones of when each action is expected to be implemented;
 - c. assign the necessary resources to implement the remedial action;
 - d. adopt the MIS work programme accordingly.
- 39 Where relevant, banks are expected to provide information on internal procedures for improving data quality.
- 40 Where a number of obstacles are identified, banks, in agreement with IRTs, are expected to define their priorities in implementing remedial actions.

²⁰ In agreement with the IRT, and based on the proportionality principle, the bank will be expected to provide this information either at the level of the tab (e.g., Section 1 - Liquidity evolution) or at the level of individual tables within the tab (e.g Section 1 - Liquidity evolution, TABLE 1B - TOTAL PAYMENTS).

²¹ See Operational Guidance on Operational Continuity [here](#) on the SRB website.

2.4. Minimum set of data points²²

- 41 As specified above, the SRB is closely cooperating with the ECB on the topic of measurement and reporting of liquidity. This is to leverage on synergies and reduce the reporting burden on banks.
- 42 Within the framework of the cooperation between the SRB and the ECB, and leveraging upon the existing SSM Liquidity template,²³ a Joint Liquidity Template is developed, which encompasses the minimum set of data points banks are expected to report at resolution-group and at individual KLE level. These data points capture banks' estimates of their net liquidity position in resolution, including cash inflows and outflows (differentiating between contractual and behavioural flows), counterbalancing capacity and its liquidity value after presumed haircuts. The SRB and the ECB may from time to time amend and adapt the Joint Liquidity Template.
- 43 Within the framework of their cooperation, the SRB and the ECB communicate the Joint Liquidity Template, along with a document specifying definitions for data points and reporting instructions separately from this operational guidance.
- 44 The SRB will engage in discussions with the relevant authorities with respect to third country, non-BU subsidiaries or branches on the possibility of collecting the Joint Liquidity Template in the event they are identified as KLEs.
- 45 Particularly as regards data points already requested as part of the phasing-in of Principles 3.1 and 3.3, banks are expected to build on the related capabilities.
- 46 Banks are expected to develop the capabilities to fill in the Joint Liquidity Template according to prevailing market conditions²⁴ and bank-specific variables at the time of reporting. In particular, banks are expected to be able to estimate liabilities with an uncertain run-off profile, such as open maturity items²⁵, and to document any assumptions made in the calibration of parameters used in the estimation.

When estimating and reporting the liquidity position, banks are expected to develop the capability to take into account the impact of prevailing market conditions on the method and timing of asset monetisation, aligned with the work requested for Principle 3.3²⁶.

²² This chapter explains the capabilities banks are expected to develop in general. For details on expectations for the 2023 collection exercise, please refer to Section 3.

²³ The version of the SSM liquidity template, used as a base only, corresponds to the one collected by the ECB during the last annual reporting exercise in September 2022.

²⁴ Prevailing market conditions should be taken to mean the conditions applicable at the reporting date.

²⁵ No specific resolution assumptions will be requested from banks in 2023 RPC. For Deliverable 2a, banks are expected to report the open maturity items in line with the communicated reporting instructions. In the event of further work on resolution scenarios, banks are expected to leverage on the work done for Principle 3.1 to factor in resolution-specific assumptions when filling in the template – further guidance will be provided to banks in this context

²⁶ In particular, when reporting collateral details in the Joint Liquidity Template, banks are expected to leverage on capabilities developed in the identification of collateral as part of Deliverable 2a 'Identification of collateral' in the 2022 priority letters.

3. Deliverables for 2023

- 47 The annex to the priority letter specifies the following deliverables expected from banks for the 2023 RPC:
- a. a note on their internal framework, governance and MIS capabilities ('Deliverable 1');
 - b. a predefined set of data points on their liquidity situation to be reported by means of the Joint Liquidity Template during an annual exercise to be jointly performed by the SRB and the ECB ('Deliverable 2a'); and
 - c. a note containing an analysis of any potential shortcomings regarding their capabilities to report the Joint Liquidity Template ('Deliverable 2b').
- 48 As part of Deliverable 1, banks are expected to:
- ▶ submit a description of their internal framework, governance and MIS to meet data expectations, including the elements described in Sections 2.1 and 2.2. Banks are expected to provide flowcharts and graphs in the representation of the related processes and data flows across systems;
 - ▶ provide details about their ability to forecast their net liquidity position across time periods;
 - ▶ indicate any identified obstacles to reporting particular data points of the Joint Liquidity Template at the requested frequency and scope (i.e. at the level of the resolution group and at the level of the KLEs), including remedial actions.
- 49 To operationalise and test the aforementioned capabilities, the SRB and the ECB jointly perform a data collection exercise for which the modalities and expectations are specified in Section 3.1 ('Deliverable 2a').
- 50 In the note requested as Deliverable 2b, banks are expected to focus on:
- a. any potential shortcomings regarding their capabilities to report the Joint Liquidity Template, for example, if banks have not developed the capabilities to submit the template at the resolution-group level or individual KLE level or if they have experienced particular issues in reporting specific data points;
 - b. actions to remove any such shortcomings, and a timeline for these actions;
 - c. any necessary updates to the remedial actions defined under Deliverable 1 and any additional actions necessary for the banks' general work programme.
- 51 For Deliverable 1 banks are expected to assess, prior to the 2023 reporting exercise, and at the level of all KLEs, whether any gaps in their capabilities to report the data have been identified. In that context, for Deliverable 2b banks are expected to address obstacles identified as part of the actual reporting exercise.

3.1. Collection exercise for Deliverable 2a

- 52 The data collection exercise is put in place to test banks' capabilities to report the Joint Liquidity Template as this template will be requested from the bank in case of resolution.
- 53 The focus of the exercise is on the capability of the bank to provide the data points in the Joint Liquidity Template at the level of the resolution group(s) and KLEs and with a high level of frequency²⁷. Hence the focus is not on assessing the liquidity position of the bank at the time of reporting of the 2023 collection exercise.
- 54 Banks are expected to submit the template in Excel format and fill it according to the reporting instructions for the Joint Liquidity Template.
- 55 The reporting scope for the 2023 collection exercise is decided jointly with the ECB. As part of the 2023 data collection exercise, the Joint Liquidity Template is requested only for the resolution group(s) and a representative subset of KLEs²⁸.
- 56 When the prudential consolidation and the consolidation for resolution purposes differ (e.g. in the case of MPE), the scope is determined to reflect both ECB and SRB needs.
- 57 For the data collection exercise in 2023, banks are expected to provide the data in the Joint Liquidity Template according to the prevailing market conditions at the time of reporting²⁹.
- 58 Although the scope of the data reporting exercise for 2023 is limited to resolution groups and to a predefined number of KLEs, banks are expected to develop capabilities to report the Joint Liquidity Template for all relevant KLEs.
- 59 With respect to the scope of reporting, it will be communicated to banks jointly by the SRB and the ECB in June 2023.
- 60 The data reporting exercise will run for 5 consecutive business days at the end of October 2023 and the template must be reported as per the defined reporting scope. The banks are expected to submit the template once every day.

²⁷ While banks are expected to build capacities to report the Joint Liquidity Template with a high level of frequency, their ability to report in this way will not be a priority for the SRB for the 2023 exercise.

²⁸ This includes (sub)groups of KLEs as specified in paragraph 14.

²⁹ Further details are in the reporting instructions for the Joint Liquidity Template

61 The ECB and the SRB put in place a Q&A process through which banks can raise questions on the data collection exercise. The modalities of the Q&A process are laid down in the reporting instructions of the Joint Liquidity Template.

3.2. Other cross-border groups

62 In order to ensure that all banks under the direct remit of the SRB are resolvable, all actions and deliverables outlined in Chapters 1 to 3.1 of this operational guidance are also expected from the other cross-border groups under Article 7(2)(b) of the SRMR, for which the strategy is resolution. In this case any reference to the SRB and the ECB included in such Chapters is to be intended as a reference to the SRB only.

63 The cooperation between the SRB and the ECB does not apply to the other cross-border groups. In that context such groups are not expected to submit the Joint Liquidity Template but a SRB liquidity template, which is identical to the Joint Liquidity Template.

64 The SRB Liquidity Template and any documentation supporting its reporting are communicated by the SRB to the other cross-border groups separately from this operational guidance.

65 The collection exercise 2023 will be performed by the SRB in close coordination with NRAs. The reporting scope for the 2023 collection exercise is decided by the SRB and will be communicated to the other cross-border groups in June 2023.

66 As part of the 2023 collection exercise, the other cross-border groups are expected to submit the liquidity template to NRAs who will then share it with the SRB³⁰.

67 The other cross-border groups are expected to develop the same capabilities for the SRB liquidity template as specified above for the Joint Liquidity Template for entities under Article 7(2)(a) of the SRMR.

68 Other cross-border groups are expected to address their questions directly to the SRB.

³⁰ In line with the process established for other resolution reporting.

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