OPERATIONAL GUIDANCE ON RESOLVABILITY TESTING FOR BANKS'

Communication area supplement

FOR CONSULTATION

Single Resolution Board

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Context

The SRB consulted the banking industry and relevant stakeholders on its *Operational Guidance on Resolvability Testing for Banks* between 17 March and 5 May 2025[1]. With reference to the EBA Guidelines on improving resolvability[2], the guidance aims at promoting a harmonised approach for the implementation of the multi-annual testing programme, defines testing areas and sub-areas and testing methods, as well as setting expectations for banks on testing governance, design, preparation and reporting.

The version of the guidance that was published for consultation did not contain a specific section with respect to communication, which is the focus of this particular guidance document.

[1] SRB, Public consultation on the Operational Guidance on Resolvability Testing for Banks, 17 March 2025, https://www.srb.europa.eu/en/content/public-consultation-operational-guidance-resolvability-testing-banks

[2] Guidelines EBA/GL/2023/05 amending Guidelines EBA/GL/2022/01 on improving resolvability for institutions and resolution authorities under articles 15 and 16 of Directive 2014/59/EU (Resolvability Guidelines) to introduce a new section on resolvability testing. https://www.eba.europa.eu/sites/default/files/document_library/Publications/Guidelines/2023/1056369/Guidelines%20amending%20Guidelines%20on%20improving%20resolvability%20for%20institutions%20and%20resolution%20authorities.pdf

Part 2 – Specific testing areas

7. Communication

7.1. Testing sub-areas

Testing sub-area: description	Heatmap capability(ies)
1. Management of the information and communication environments: banks are expected to have in place comprehensive governance arrangements[3] to monitor media channels and mitigate risks stemming from different information environments. The communication plan is expected to include comprehensive strategies to mitigate the impact from negative market reactions and address the consequences of leaks and/or misinformation.	**Principle 6.1 and Principle 6.2**
2. Adaptation of the communication plan: banks are expected to have in place comprehensive governance arrangements for adapting the communication plan in a timely manner, including calibrating the communication plan and related documents to the specificities of the stress event and, once the resolution details are made available to the bank, to the applicable resolution action per critical stakeholder. Banks are expected to develop and maintain up-to-date, fully-fledged and operational communication plans for resolution, taking into account the PRS and VRS. The communication plan is expected to cover all three resolution phases, i.e., pre-resolution, in resolution, and post resolution (where applicable).	**Principle 6.1 and Principle 6.2**

[3] As per the Operational Guidance on Banks' Communication, for EfB principle 6.2, governance arrangements comprise the collection of strategies, policies, processes and/or procedures that are in place to ensure that the relevant objective/expectation is met.

3. Execution and monitoring of the communication plan: banks are expected to have in place comprehensive governance arrangements for executing efficiently and effectively the communication plan in different jurisdictions and for monitoring its execution.	**Principle 6.2**

Specific test environment needs

No concrete need for developing a testing environment has been identified.

Reference date / period

1. No specific reference date is required for any of the sub-areas (i.e., to be agreed with the IRT).
2. To make tests in communication more realistic and optimise the use of banks' resources for testing, it is suggested to bundle tests on communication with tests on other dimensions. In these cases, the reference date shall be aligned with that set for other areas.

Specific deliverable – Adapted communication plan

Expectations

1. For the testing of sub-area 2, banks are expected to deliver the communication plan as adapted for the particular resolution scenario used in the test.
2. For the testing of sub-area 3, banks are expected to develop an adapted communication plan in the design phase of the testing exercise (i.e., as an inject), with the focus being on its execution and monitoring.
3. Banks are expected to take into account all the elements in the resolution scenario used in the test when adapting the communication plan. Depending on the selected resolution tool and any staff and infrastructure constraints (e.g., in terms of the availability of the infrastructure with respect to certain communication channels), the communication plan may have to be materially adapted.
4. The delivery of the adapted communication plan should be provided in clean and track changes versions (versus the communication plan developed by the bank in resolution planning).

Specific deliverable – Evidence Book on communication

Expectations

5. Banks are expected to provide:
   a. All the material foreseen in the communication plan for its execution. This would include, inter alia, communication messages to stakeholders, Q&A documents and press releases.
   b. A comprehensive log of approvals for the finalised communication messages and the execution of the communication plan.
   c. Evidence of how the infrastructure and resources relevant to the execution of the communication plan was mobilised (this could also include captures or logs from social listening tools).
   d. Evidence of the monitoring of the execution of the communication plan, in accordance with their governance arrangements. The evidence could include monitoring logs, meeting minutes, status reports, etc.
   e. For management simulations, summary notes of the senior management sessions with particular emphasis given to documenting the monitoring process at senior management level.
6. Banks are expected to collate all the evidence in an organised single “Evidence Book”, instead of providing IRTs with numerous files.

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