



TECHNICAL MEETING

OPERATIONAL GUIDANCE ON BANKS' COMMUNICATION

Virtual meeting, 19 November 2025

Objectives and rules



OBJECTIVES

- Allow interested parties to ask for clarifications before the closing of the consultation period

The technical meeting **does not replace written responses to the consultation.**

Only the formal views from stakeholders submitted via written response will be considered.

Please note that this event focuses exclusively on the *Operational Guidance on Banks' Communication* and the *Communication testing supplement*, and will not cover other topics.

RULES

- Meeting **will not be recorded**
- Ensure microphones stay muted during the presentation
- To intervene during the Q&A session:
 - ➔ **Raise your hand in WebEx and state your name and organisation;**
 - ➔ **Write your question in the chat ("SRB chat").**

SRB consultation on communication guidance

Background

The SRB launched on 17 October a public consultation on two documents:

- Operational Guidance (OG) for banks' communication in resolution; and
- Communication testing supplement to the OG for Resolvability Testing for Banks.

The consultation runs until 12 December 2025.

- The final publication of the guidance will be accompanied by a **summary of the contributions** from industry, explaining how they were taken into account.
- Once this guidance is finalised, the content of the communication dimension, as reflected in the **SRB's Operational Guidance for Banks on Resolvability Self-Assessment**, may be subject to change.

Contextual elements

OG for banks' communication in resolution (1/2)

- **Timely and accurate communication is essential when resolution actions** are taken towards banks that are failing or likely to fail. Alongside communications from the public authorities, banks are expected to deploy communication strategies for robust and consistent communication to relevant stakeholders, to support the resolution strategy.
- The OG has been **developed with a view of:**
 - Reflecting legal requirements;
 - Providing additional elements to help further operationalise EfB principles 6.1 and 6.2;
 - Consolidating expectations with respect to communication referenced in other SRB operational guidance documents;
 - Drawing on lessons learnt from recent banking crises.
- Although the majority of the guidance draws upon existing expectations, there are **some additional elements** aimed at increasing preparedness (such as the consideration of the moratorium tool)

Contextual elements

OG for banks' communication in resolution (2/2)

- In line with SRB's **simplification initiatives** and to align with the [OG for banks on resolvability self-assessment](#):
 - 'Advanced' capabilities are expected to be maintained if requested by IRTs in the resolution planning stage. These are clearly indicated in the OG. For 'advanced' capabilities the IRTs will seek to ensure that the selected capabilities are both necessary and proportionate to support the resolvability of the bank concerned;
 - The expectation to review and submit communication plans annually has been replaced with a more flexible approach of regular and ad-hoc updates;
 - Proportionality considerations have been emphasized up-front to ensure there is a productive dialogue between IRTs and the banks on which elements would need to be developed more in depth for the effective implementation of the bank's resolution strategy (PRS and VRS).
- A 'transition period' is already foreseen in the OG, allowing banks until **30 June 2027** to meet the full set of expectations.

SRB OG on Bank's Communication

Structure and points of attention

It is composed of the following sections:

- Purpose and objectives
- Scope and application
- Proportionality
- Coordination between the bank and the resolution authorities
- Moratorium tool and implications for communication
- Banks' communication plans for resolution
- Banks' communication governance
- Annex - Proposed structure for the Banks communication plan framework
- Annex - Flashcard example

- **Emphasis on the need for coordination between the bank and the resolution authorities.**
- **Active management of banks' communication and informational environment.** (inter alia: non-traditional media channels, management of misinformation, preventing and addressing information leaks, managing disclosure requirements in different jurisdiction).
- Operationalisation of the **availability and deployment of infrastructure and resources**, including establishing a list of executives that could be appointed as spokesperson in resolution.

Communication area supplement to the SRB OG on resolvability testing for banks

- The SRB's communication area supplement **lays out the testing sub-areas for communication** and corresponding modalities (such as specific deliverables).
- **There are three sub-areas envisaged for testing:**
 1. Management of the information and communication environments;
 2. Adaptation of the communication plan;
 3. Execution and monitoring of the communication plan.
- **Evidence Book** on communication: defined as a deliverable, this is the collation of all evidence from the testing exercise in a single document.



Q&A



THANK YOU!

Annex: Consultation questions (1/3)

OG for banks' communication in resolution

Topic	Question
Proportionality	Are there any specific bank characteristics (e.g., business model, geographical footprint) or other factors that would warrant further ex-ante adjustment(s) of the expectations set by the guidance?
Coordination between the bank and the resolution authorities	In a resolution event, are there additional considerations/needs for coordination with resolution authorities in different jurisdictions that have not been adequately captured by the guidance?
Moratorium tool	If the resolution authority were to apply the moratorium tool and exclude certain types of counterparties from the scope of that power, would such differentiation trigger specific challenges with regard to the bank's communication to the public and its counterparties?
Scope of communication plan	Are the scope and the structuring options (see paragraph 27) clear? If not, please elaborate, providing proposed ways forward where applicable?
Infrastructure and resources / spokesperson	In relation to the designation of a spokesperson, are there other considerations to be taken into account while designating them? Please provide justification.

Annex: Consultation questions (2/3)

OG for banks' communication in resolution

Topic	Question
Operationalisation of the communication plan / template and other documents	The operational guidance intentionally does not refer to the development of template documents, emails, frequently asked questions and other tools to be used in the resolution process. Do you consider it useful to keep such documents and tools up to date in business-as-usual, or should they be updated and tailored within the Communication Plan once stress materialises? If the latter option is supported, would the updating and tailoring be possible in all cases prior to resolution, and in particular under a fast-moving stress scenario? In preparing them, either in business-as-usual or in a stress situation, is additional guidance or other support such as sample templates needed in the operational guidance?
Annex A	Do you have proposed amendments to Annex A while covering the SRB's expectations under this guidance?
Impact analysis	With respect to new elements of the guidance related to EfB dimension 6, do you consider it would require increased resources to implement these? Do you have an assessment of the relevant cost for you?
Additional comments	If you have any additional comments, please provide them here.

Annex: Consultation questions (3/3)

Communication area supplement

Topic	Question
Comments	Do you have any comments on the expectations for each of the specific proposed deliverables for testing the capabilities related to communications?