OPERATIONAL GUIDANCE ON RESOLVABILITY TESTING FOR BANKS

Communication area supplement

Single Resolution Board

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This document should not be considered as representative of the Single Resolution Board's official position.

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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 aim is to promote a harmonised approach for implementing the multi-annual testing programme, define testing areas and sub-areas and testing methods, and set expectations for banks on testing governance, design, preparation and reporting.

The version of the guidance published for consultation did not contain a specific section on communication, which is the focus of this particular guidance document.

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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

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 address disclosure requirements (in the EU and wherever relevant in third countries), 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. 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**

[3] As per the Operational Guidance for Banks on Communication in Resolution, for the 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.

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 is expected to be coherent with those set for other areas.

Specific deliverable – Adapted communication plan

Expectations

3. For the testing of sub-area 2, banks are expected to deliver a communication plan adapted to the particular resolution scenario used in the test.

4. For the testing of sub-area 3, banks are expected to develop an adapted communication plan in the design phase of the testing exercise (e.g. also as an inject), with the focus on its execution and monitoring.

5. 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.

6. The adapted communication plan is expected to be provided in clean and track change versions (versus the communication plan developed by the bank in resolution planning) and delivered to the IRT via IRIS, in accordance with the timeline specified in the description of the test or otherwise agreed with the IRT.

7. The bank is expected to submit to the IRT via IRIS the relevant outcome report[4] and, where applicable, the independent observer report, within one month of the finalisation of the test, unless otherwise agreed with the IRT.

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4 See relevant link to SRB Operational Guidance on resolvability testing and relevant templates: https://www.srb.europa.eu/en/content/resolvability-testing-banks

Specific deliverable – Evidence Book on communication

Expectations

8. Banks are expected to provide the following, based on the scope decided by the IRT:

a. 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. 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 were 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 on documenting the monitoring process at senior management level.

9. Banks are expected to collate the relevant evidence in an organised single 'Evidence Book', instead of providing the IRT with numerous files.

10. In addition, the method for providing the relevant deliverables of the test (i.e. the format and supporting evidence) may be agreed with the IRT, alongside the expected content, taking into account the specificity of the tests required by the IRT.

11. The Evidence Book on communication is expected to be delivered to the IRT via IRIS, in accordance with the timeline specified in the description of the test or otherwise agreed with the IRT.

12. The bank is expected to submit to the IRT via IRIS the relevant outcome report and, where applicable, the independent observer report, within one month of the finalisation of the test, unless otherwise agreed with the IRT.

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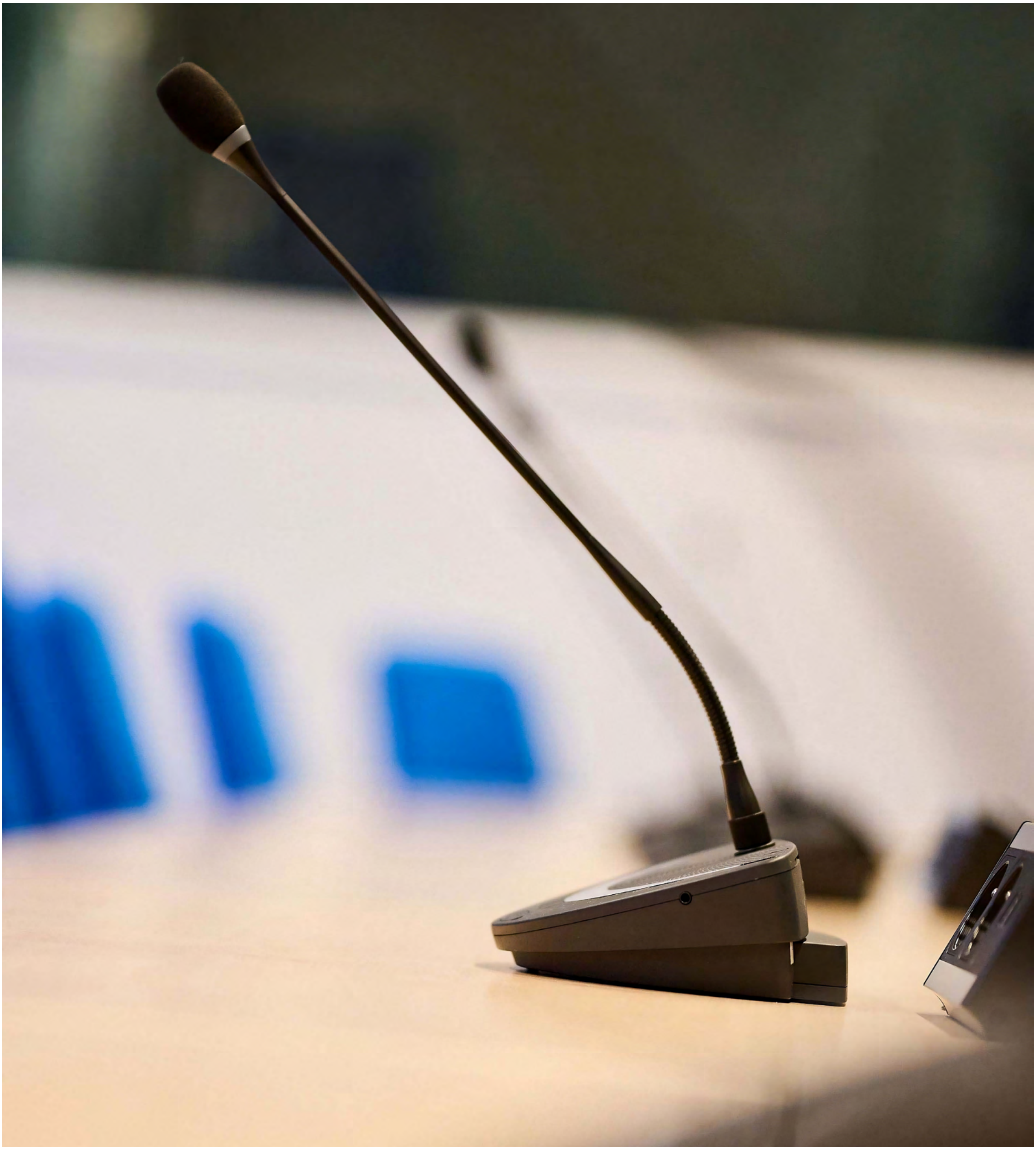

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