

## Transforming Data Collection (TDC)

Town Hall 29 March 2023





#### **Contents: Main presentation – links to slides and recordings**

Link to place in document	Link to place in recording
Main presentation – first slide	Full event recording
Welcome and opening remarks	Jessica Rusu Introduction Nathaniel Benjamin Introduction
What is the TDC vision?	TDC Vision
What has TDC looked at so far?	Looked at so far
What was committed to in July 2022?	Financial Resilience Survey Quarterly Statistical (DQ) Derivatives Return
What has been delivered to date?	Intuitive Form Design
Update on the phase two use cases	<u>Commercial Real Estate (CRE) data</u> <u>Incident, Outsourcing and Third Party Reporting</u> <u>Strategic Review of Prudential Data Collection</u> <u>Retail Banking Business Model</u>
What's next	What's next and timeline
Closing Remarks	Jessica Rusu closing remarks



#### **Contents: Showcase session – links to slides**

On the day we held a Showcase and Networking session for in person attendees. This part of the event was not recorded however, the slides are included in this document.

Please use links on the right to navigate to the sections you would like to view.

Link to place in document
Showcase session – first slide
Firm Portal
Firm View at a Glance
Intuitive Form Design
Commercial Real Estate (CRE) Data
Quarterly Statistical (DQ) Derivatives Return
Strategic Review of Prudential Data
Retail Banking Business Model Data
Incident, Outsourcing and Third Party Reporting
Get Data Service: Counterparty Classification

## Town Hall main presentation

You can view the full Town Hall recording here







## Agenda

	Presenter	Timings
Welcome and opening remarks	Jessica Rusu, FCA Nathaniel Benjamin, BoE	10 mins
<ul> <li>Progress update</li> <li>Overview of use cases</li> <li>Progress update</li> <li>Benefits</li> </ul>	Lauren Dixon, FCA Angus Moir, BoE	20 mins
Panel and Audience Q&A *	Panel: Nat Benjamin, BoE Lauren Dixon, FCA Lee Fulmer, UBS Andrew Turvey, Belmont Green Andrew Douglas, DTCC Julie Ampadu, Chair, APCC	20 mins
Reflections from firms	Lauren Dixon, Angus Moir	5 mins
Closing remarks	Jessica, Nat	

\*Please note this part of the event was not recorded



## Welcome



**Jessica Rusu**, ExCo Director and Chief Data, Information, Intelligence Officer, FCA

View Jessica's introduction here



Nathaniel Benjamin, ExCo Director for Authorisations, Regulatory Technology, and International Supervision, Bank of England

View Nathaniel's introduction here



# What is the TDC vision?

You can view this section of the presentation recording here





## Data Collection Transformation

Regulators get the data they need to fulfil their mission, at the lowest possible cost to industry



**Integrating reporting** to increase consistency in designing and delivering collections for value, reuse, and efficiency



**Modernising reporting instructions** to improve how data is interpreted and implemented by firms.



**Defining and adopting common data standards** that identify and describe data in a consistent way. These should be open and accessible for use by everyone.



# What has TDC looked at so far?

You can view this section of the presentation recording here





Phase one use cases (2021 – 2022)	Phase two use cases (2022 – 2023)
1 Financial Resilience Survey	4 Strategic Review of Prudential Data Collection from solo regulated firms
2 Commercial Real Estate Data discovery	5 Commercial Real Estate Data
<b>3</b> Quarterly Statistical (DQ) Derivatives Return	6 Retail Banking Business Model
	7 Incident, Outsourcing and Third Party Reporting

#### **Related work**

- Commissioned a Data Standards Review from Ernst & Young due April 2023
- Digital Regulatory Reporting Horizon scan update due April 2023





## How does TDC work?







## Common themes across Firm Research



Firms find the guidance and Handbook hard to access and understand



Firms submit data but often **do not receive any feedback** from regulators on what they submit



There are **multiple reporting systems** and it is not easy to keep track of everything



The purpose of why the data is needed is not always clear



# What was committed to in July 2022?

You can view the update on the Financial Resilience Survey use case here

You can view the update on the Quarterly Statistical (DQ) Derivatives Return use case here





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#### **Update on implementation of phase 1 recommendations** Financial Resilience Survey (FRS)



Firm portal and home pages - Discovery



Firm view at a glance - Discovery



Intuitive form design – Alpha/Design



Future Financial Resilience Survey (and data collection process change) – Alpha/Design



### Firm Portal – exploring a streamlined reporting platform

#### A service design-led approach to understand improvement opportunities across the experience



#### In-depth user interviews with a representative sample





**Update:** Deloitte is conducting discovery and will provide a report with recommendations & options by end of April

**Status:** 40+ user research interviews with firms completed, 6 key themes identified so far



#### Firm Portal – key emerging user research themes



1. Authorisations application processing delays



2. Lack of interaction from FCA



3. Lack of guidance especially for smaller firms



4. System issues

5. Access management issues



6. Data collection not 'joined up'

#### Come speak to us!

We want to hear about your experience - come see us at the Firm Portal Discovery stand



#### Firm view at a glance



What: Personalised firm view of data that has been submitted

**Update:** Proof of concept prototype is has been developed

**Status:** Prototype to be tested with a small group of firms using financial resilience survey data in April 2023





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	Incident, Outsourcing and Third Party Reporting

#### Update on implementation of phase 1 recommendations Form DQ - Plan

Bank of England Topics + About + News and publications + Museum Control	t Search the Bank of England Q		E	Bank of England	Topics	<ul> <li>About          <ul> <li>News and publication</li> </ul> </li> </ul>	sv M
tions / families / fails calculated / faulting addition to us Reporting statistics to us Find out who needs to submit statistical returns to us, check deadlines and get instructions to use.			(		deriv	vatives (DG	
On this page	What's new Provide a set of	A		by this page by the second se	Show definition Firms reporting i Baliance of paym Quarterly Quarterly 2022 C022 C022 C022 C022 C022 C022 C02	Description of derivatives point entry, National accounts Description 1. January 2023 6. May 2023 19. September 2023 19. November 2023	ions
How to report -			5	Scope of report			





Counterparty classification standardisation

Restructured reporting instructions



# What has been delivered to date?

You can view this section of the presentation recording here





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#### **Intuitive Form Design: Consumer Credit form CCR007**



lew design	Hard and soft validations		
* Mandatory field(s)		1	
		Α	
1 Revenue from credit-related regulated	1 Revenue from credit-related regulated activities *		
2 Total revenue (including from activitie	s other than credit-related regulated activities) *	• <b>1</b> e.g. 0	
3 Number of transactions involving cred	it-related regulated activities in reporting period	* e.g. 0	
4 Number of complaints related to credit-related regulated activities received in period * e.g. 0			
5 Credit-related regulated activity which generated the highest amount of turnover in the reporting period *			
6 Total annual income as defined in <u>FEES 4 Annex 11BR</u> G for the purposes of FCA fees e.g. 0 reporting*			
SAVE DATA		VALIDATE DATA	
	Quick links t specific guidar		



### **CCR007: Feedback so far**

- Change went live January 2023
- Monitoring the volume and type of calls to FCA Supervision Hub
- Peak reporting is March and April 2023
- Total revenue reported has increased by £79m compared to last year



"The guidance being on one webpage and easy to navigate has really helped me when speaking to firms" – **Sup Hub supervisor** 









Next form: FSA038 and built into standard FCA form design



# Update on the phase 2 use cases

You can view the update on the Commercial Real Estate (CRE) data use case here

You can view the update on the Incident, Outsourcing and Third Party Reporting (IOREP) use case here

You can view the update on the Strategic Review of Prudential Data Collection use case here

You can view the update on the Retail Banking Business Model use case here







Phase one use cases (2021 – 2022)	Phase two use cases (2022 – 2023)
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## Commercial Real Estate (CRE) data







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Incident, Outsourcing and Third Party Reporting (IOREP)

The IOREP use case is split into three distinct phases:



\*to be delivered by external consultants



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## Strategic Review of Prudential Data Collection: Themes identified from Discovery







4. Training and Tooling



2. Data input & validation



5. Data quality, trust and timeliness



3. Data Adequacy



6. Measurements



## Next steps are to test hypotheses in the Alpha phase



- By ensuring a **shared understanding** of what prudential data the FCA needs to fulfil its mission and how it will use that data, the FCA will reduce the reporting burden on firms and itself.
- By providing solo-regulated firms with simpler, clearer guidance and better data validation at the point of data entry, the FCA will improve the quality, accuracy and timeliness of the reporting data those firms submit.





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### Journey map

#### **Emerging issues**

- Time-consuming to identify the right people
- Definitions are not aligned to businesses
- QA is quite manual and could be more thorough
- Reliance on others
   to access data



#### **Opportunities**

- Clearer context and purpose
- Support firms with interpretation
- Automation of cleaning
- Help users to discover and use data



## What next?

You can view this section of the presentation recording here






## A new data collection process

### Transition State 1 – Discover what doesn't work now and improve it

## **Transition State 2** – Test a new way of collecting data starting with the data need

### **Build capabilities into Business as Usual:**

- FCA and BoE best practice form design
- New end to end collection process / Get Data service (that all new collections or those being improved go through)
- Simpler guidance and instructions for all new collections
- Testing with firms before go live
- Platform improvements (Firm Portal)
- Improved firm feedback

**Build these capabilities into BAU** 







## Closing remarks

You can view this section of the presentation recording here





## Showcase and networking session slides





## **Firm Portal**

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Scope

## The FCA wants to **make it easier for firms to access FCA systems, reducing the burden on firms** as well as on the FCA in supporting Firm access & usage.



## **Firm Portal Discovery Objectives**

- Understand the existing experience of those interacting with the FCA – internal & external users
- 2. Identify opportunities to reduce the burden on firms and the FCA when submitting data
- 3. Develop options for how the FCA can deliver an improved experience for firms

### **In-scope FCA systems for Discovery:**

- RegData
- Connect
- Fees
- Intact
- Ad hoc collections



## Approach

# Our approach puts the voice of firms at the heart of our Discovery

We have had in-depth conversations with **30+ firms** across a representative sample of:

- Portfolios
- Regions
- Sizes
- Supervision methods



## What are we hearing?





## What comes next? Categorising & tagging research outputs...

Pain Points	+ …	Touchpoints	+ …	Stage of journey (granular) 🕂 🚥	Emotion + •••
Expensive 1		FCA Handbook 3		Overall Perception of FCA 9	Satisfied 18
Manual process 11		Third Party System 9		Logging in to systems 10	Overwhelmed 4
Time 12		RegData 65		Preparing data 20	Confused 17
People & Process 39		Connect Portal 31		Submitting data 59	Helpless 9
Quality 11		Intact Portal 1		FCA Communications 39	Frustrated 25
Data 24		Fees Portal 3		Getting Support from FCA 20	+ New tag
Systems 40		FCA Helpdesk (Phone) 13		Understanding FCA policy / rules 11	
+ New tag		FCA Emails 17		Getting help from third party 6	
		+ New tag		Fees 1	
				1	



## What comes next? ...and pinpoints areas of opportunity across the user





## Firm View at a glance





## Firm View: mock-up with FRS data





Reviewed feedback in Phase 1 and translated pain points into a set of user stories



Produced a high level design focussed on a single collection (FRS)



We are now working on building a prototype based on the design



## Intuitive Form Design





## **Background and why**

The intuitive form design project was set up to make improvements to how we deliver RegData forms to make them easier for firms to use and decrease issues the FCA experiences with the data submitted



### Firms fed back to us:

- That the returns on RegData could be complex and the questions not clear
- They did not know why we were asking them for the data and what we used it for
- The guidance was not easy to access, the FCA handbook was lengthy and complex and the webpage FAQs not always complete and up to date



### FCA users fed back to us:

- Poor quality information was submitted
- Submissions were late and with incorrect data leading to resubmission requests



## The process



Worked closely with Data Collections product Group (who own RegData) we set up a working group pf FCA colleagues to review the design of regulatory reports using findings from discovery research and firm engagement



Identified CCR007 as pilot return due to it causing approx. 20% of all regulatory return calls into the Supervision hub as well as data quality issues for Finance



Identified pain points and proposed changes The group included Sup Hub, Policy, DCPG, UX Design and Finance



We consulted key stakeholder withing the FCA and several Consumer Credit Firms and Compliance Consultants using prototype of new design



## The process



Feedback gathered, design updated and passed to DCPG for development in RegData



Carried out Business Acceptance testing with working group members and wider key stakeholders



Undertook testing on the RegData Firm testing platform with firms involved in design review



Released new CCR007 version to live and monitored impact and success closely during first month of live



Using this process we are now looking at prudential return FSA038 to consolidate learning



## What changes were made: Old design to new design

### <u>View recording demonstration of new CCR007 form with improvements highlighted here</u>

imited Permissio		a for Credit Firms v	vith the Dara
N Firm Name			
Reporting Information			
Reporting Period	Due Date	Currency	Currency Units
06/04/2021 to 05/04/2022	20/05/2022	GBP	Single
Completion Guidance lease complete all questions. Is this your firm's first CCR	0077		
	res from the date you were	authorised to the reporting period	d end date shown above.
Q 1-5: You should report figur		re completing this question. This is	information is used to work out your
Q 6: It is important that you in fees for the next financial you	ar and the figure must be	annualised if it does not represent	t a 12 month period. For example, 6 f, you should divide the figure by 7
Q 6: It is important that you release for the next financial you only have income from ch	ar and the figure must be	annualised if it does not represent	



## The benefit (pilot measures – Jan 2023)



Jan-22 ■Jan-23







## The benefit (pilot measures – Jan 2023)

Validations have led to higher quality data. Poor quality data poses a risk to our decision-making

## Reported Credit-Related and Total Revenue among 30 firms who failed validation in January 2022

90,000,000		Validation or		
70,000,000		arket changes ould be driving	There is a £76mn	79,720,000
60,000,000	ch	this £32mn ange in credit-	increase in revenue reported	
50,000,000	re	elated revenue	by firms that	
40,000,000	42,910,000		submitted invalid data last year	
30,000,000				
20,000,000	-			
10,000,000		10,860,000	3,100,000	
0	Credit-rela	ated revenue	Total rev	enue

Jan-22 Jan-23



## **CCR007 Quotes**

### **Before changes**

The links to the help text and guidance is confusing, it doesn't take me to the guidance I need for this report. Firm user

What do I put in the box for revenue, this is a vague question. Could you provide clarity to help me complete this question? Firm user

#### **After changes**

The notes for question 6 are very good and really help me understand what figures I need to use Firm user "I feel the CCR007 calls have reduced and even if we were to get a query, it's made it so much easier for us to guide the firm Sup Hub First Line" Supervisor

The late returns warning in the Compliance Guidance section really focuses your mind when starting to complete this return Firm user "Streamlined access to webpage guidance, question level help and better navigation on page makes it much easier to find the information I need to complete the report" Firm Primary User

The warnings are good, it prompts me to check what I have entered and make sure it is correct Firm user

"....the additional notes and warning are useful" Firm user



## **SME Quotes**

"I've enjoyed working on TDC as it has highlighted what can be achieved through collaboration across the organisation. Until mid-2022 a lot the discussions around TDC were very much proposals and blue sky thinking, with little in the way of tangible outputs being observed. Since then, the team that has been put together has shown what can be done with the dedicated resource allocated.

As a Data Steward, and heavy user of the Regulatory Reporting data that we collect, it is great to see some of the intended outcomes being achieved which will ultimately make the FCA a more data-driven regulator."

## Commercial real estate (CRE)data

**Transforming Data Collection** 



## **CRE Drivers & Goals**

## **Drivers**

Lack of adequate data



Inefficient process for Bank and firm users



Lack of standardisation



Insufficient Coverage of CRE Market

## Goals



Improved data



A service design for the regulator which is efficient for industry



Standards and instructions that are understood by industry



Increased market coverage

## Commercial Real Estate (CRE) data - Progress so far



## Commercial Real Estate (CRE) data - Problem statements

### **Firm perspective**



Expectations not clear



Changes not well communicated



High cost of changes



BoE submission systems not userfriendly



Reporting requirements not aligned to firm practice

### **Bank perspective**



Submitted data often not fit for purpose



Data review process is manual



Updating collections is time-consuming



Coverage of collections is incomplete



Data difficult to access internally



Little alignment between datasets

## **Design principles for CRE solutions**



Increased emphasis on regular collections, de-emphasis of ad hoc collections



Drafting regular collections to be as flexible as possible i.e. Bank users can answer wide variety of questions from single dataset



Clearly defined expectations for data we collect (data definitions, reporting instructions, timetables and data quality standards)



Ensure reporting requirements are efficient for firms and commensurate with risk

## Solution Design ideas for CRE data



Data model



Reporting Instructions as a Service



**Submission** mechanism



Public data sharing mechanism



**Trouble shooting** chat bot



Transparent data definitions

Data quality standards



**Continuous data** streaming



**Automated** knowledge graphic



**Flexibly reported** data components



## Quarterly statistical derivatives (Form DQ) return

**Transforming Data Collection** 



## Form DQ use case



## The brief

How can we improve the experience of submitting derivatives data (Form DQ) to the Bank?



## **Problem to solve**

Users find instructions complex and hard to follow

## Form DQ: Where in the process are we now?



## Form DQ: The Double Diamond Design process



## Form DQ: Review Phase 1 design concepts



#### Who has to provide us with statistical data?

Any financial institution that has permission from the Prudential Regulation Authority (PRA) to accept deposits has to provide us with data.

What you have to report depends on the size and type of your business. Once the PRA has granted you permission to accept deposits, we will let you what your statistical reporting requirements are in writing. If you are unsure of your current obligations, email **25 DSDComplemene@bankOetBind.co.uk** for more information



#### Classification of accounts guide

This guide is intended for all institutions completing a range of Bank of England statistical returns. It describes the two most important systems of classification used in compiling economic and financial statistics in the United Kingdom - the economic sector classification, and the industrial classification.



#### Data collection forms

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View information for each form submitted via OSCA, along with their respective definitions document.



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Contact
Search the Bank of England

Howe / Building / Data ordering / Tarms, defection and validations, / From DQ: Quarter downlow network
Form DQ: Quarterly derivatives return

Form DQ: Quarterly derivatives return
This form is used to collect data on asset and liability positions in derivatives. It should be submitted via OSCA.

On this page

Core documents reported?

What is Form DQ?

Core documents reported?

What are Derivatives?

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#### What is Form DQ?

This return captures the reporting institutions' Derivative Asset and Liability positions as at the reporting date. Aside from the BoCE, the main Users of this data are the Office for National Statistics (ONS) as Derivatives form a significant part of the UK's System for National Accounts (SNA). I.e. the UK Balance Sheet and feeds into Balance of Payments calculations. See below links ic:

this data?

> IMF consultation papers explaining how this reporting was developed

> Commentary from BofE, and even ONS, on how the data is used

#### What are Derivatives?

Financial derivalities are defined as a type of financial contract whose value is dependent on an underlying asset, group of assets, or benchmark known as the Reference Price. A derivative is set between two or more parties that can take on an exchange or over the counter (CTC). Prices for centralities derive tions fluctuations in the underlying asset. Examples of the underlying asset might be a financial instrument, commotity, exchange, or interest rate.

#### What position values are to be reported?

Contract positions should be reported if they appear on the balance sheet of the reporting institution, specifically on BT item 198. Non sterling positions should be reported in sterling equivalent as at the reporting date.

All positions should be reported at their market or fair value, where the fair value is the amount at which the contract could be exchanged in an arm's length transaction between informed and willing parties. Contracts with a positive market-loa-market value should be recorded as an asset (claim); contracts with a negative marked-tomarket value should be recorded as a liability.

#### What does the ONS do with this data?

The Form Did data that the ONS receives goes through a series of DiD position balances and movements which is then combined with an "estimate" of Net Spread Earnings (NSE) for these transactions. This data on NSE's is obtained from Firms Form PL submission.

#### Core documents

Below are a set of core documents relating to Form DQ. It is the responsibility of the individual to ensure that they have read the entirety of a document.

Title	Description	Format	Size	Last updated	Action
Form DQ definitions		PDF	0.2MB	May 2014	Download
Form DQ		XLS	1.2MB		Download
Form DQ box codes		PDF	0.5MB		Download
Form DQ internal valid	lations	XLS	0.1MB		Download
General notes and del	Initions	PDF	0.5MB		Download
Classification of accou guide	nts	PDF	0.5MB		Download



#### Introduction

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This return records Reporting Institutions' asset and liability positions in derivatives as at the end of the period. These data contribute to the UK National Accounts and Balance of Payments.

#### **Defined Attributes**

Definitions and other useful information can be found in the Bank of England Statistical Data Dictionary using attribute names and / or IDs below:

Data Attribute	Bank of England Statistics DPM Attribute ID	Attribute Usage
Reporting Schedule	N/A	Information Only
Reporting Period Start Date	boe_met.di6003 (Reporting period start date)	Reported
Reporting Period End Date	boe_met.di6003 (Reporting period start date)	Reported
Report Date		
Reporting Institution Identifiers	boe_dm.TBD (Reporting Institution) eba_metsit68 (Name of ently) boe_metsid2011 (Fim Reference Number (FRN)) eba_metsid288 (LEI code)	Reported / Eligibility
Counterparty Identifier	eba_dim:CPT (Counterparty) eba_met.si288 (LEI code)	Additional
Counterparty Institutional Sector	eba_dim:CPS (Counterparty sector)	Aggregation
Counterparty Institutional Sector	eba_dim:CPS (Counterparty sector)	Aggregation
Intra-Group Indicator	eba_dim.RPR (Related parties/Relationships)	Aggregation
Intra-Unit Indicator		Eigblity
Product Type	eba_dim:MCY (Main category)	Aggregation
Instrument Type	eba_dim:MCB (Instrument)	Aggregation / Eligibility
Risk Category	eba_dim:TRI (Type of risk)	Aggregation
Assets / Liabilities	eba_dim BAS (Base)	Aggregation
Net / Gross	N/A	Information Only
Fair Value		Additional

## Form DQ: Research with users to date



#### 1-hour interviews

UK based participants:



Off-shore based participants:





Firms





Bank B:



Bank C:



3<sup>rd</sup> Party A:



Insurance provider A:



## Form DQ: Findings – what are users biggest needs?

**Users are:** time poor, they need to find & access relevant documents quickly



Users need: to know if reporting requirements or guidance change



Users want: the purpose of every document to be clear
# Form DQ: Prototype development (based on research)





#### Form DQ: Preview of iterated designs based on user feedback





# Strategic Review of Prudential Data





### **The Discovery Team**



Mike Green User Researcher



Laura Cusack Delivery Manager



Ben Watson Interaction Designer



Karen Watts Content Designer



Rocco Quartu Product Manager



Loïc Boisdron Service Designer



### **Discovery**

We undertook a **discovery** of **prudential data collection** to understand how this can better support the **needs of the data users** and how we can make it **easier for solo regulated firms** to meet the **reporting requirements** set by the FCA.



#### What we've heard from users

"I am 100% confident in what we submit to the FCA, however I am not confident it is what the FCA wants to see..." Compliance Consultant "There is no feedback loop [from FCA] – to make things more collaborative – I'd like some more feedback...[which would] help me better manage my business from a risk perspective" IFA Practice Manager

"It's not always clear for others [within FCA]... where to get the information they need and what tools are available to look at the data we have" FCA Policy

"The one thing I would change is for all firms to have the same understanding of what to put in the box [on the RegData system]." FCA Data Scientist "Have I got enough time [to prepare and submit all this data to the FCA]? I've got clients to deal with!" Authorised Mortgage Broker

"I could not understand the validation error [on RegData] and would need to speak with somebody [at FCA]. It's clear there is a problem, but not clear what it is or how to address it." **Authorised Mortgage Broker** 



### 1 | Guidance



Guidance is not always easy to access and leaves too much room for interpretation often leading firms to second guess what the request is.

#### **Unmet needs**

- As a firm I need to be able to refer to simple, understandable guidance by the FCA so that I can ensure the data I submit is accurate, timely and correct.
- As a firm I need to understand what data I need to submit and why I am being asked for it so that I can ensure the data I submit is accurate, timely and correct

#### **Impact for the FCA**

The data submitted by firms may be unintentionally misleading or incorrect. The FCA may not be able to compare firms in an efficient way. As a result FCA users may not trust or use that data.



### 2 | Data input and validation



Users are sometimes unsure about what format the data is in and they have no feedback mechanisms they can rely on to be more confident about it. The way the data is requested is inconsistent (ad-hoc collections vs regular collections)

#### **Unmet needs**

- As a firm I need to understand what data I need to submit, in what format so that I can ensure the data I submit is accurate, timely and correct.
- As a firm I need to be given sufficient advance warning of when a submission deadline is due so I can prepare the data in time and avoid late submission fines

#### **Impact for the FCA**

The data the FCA relies on contains errors, including formatting that leads to a lack of trust, a lot of re-work and data cleansing. The data is not stored where it needs to be.



### 3 | Data adequacy



Large amounts of – often unclear – data requests create an extra burden for firms, and the FCA doesn't always get the data it needs to fulfil its mission

#### **Unmet needs**

- As a firm I only provide data that is actually required and will be used by the FCA
- As an FCA user I need to receive accurate, non-redundant and up-todate regulatory reporting from solo-regulated financial firms so that I can meet my organisation's objective of protecting consumers and mitigating risk to the UK economy

#### **Impact for the FCA**

The FCA is both asking for unnecessary data but is also missing critical pieces of data. It's hard for the FCA to find the right data

The FCA has a reliance on ad hoc collections which creates more work and has a reputational impact



### 4 |Training & tooling



FCA employees don't always have the right tools or training to quickly access the data and start acting on it.

#### **Unmet needs**

As an FCA employee I need to be able to access and understand the data myself so that I don't have to rely on others.

#### **Impact for the FCA**

Overreliance on data specialists to analyse the data and provide actionable insights slows down supervisors and other front line employees' reactivity.



### 5 | Data quality, trust & timeliness



FCA data specialists and generalists complain about the data being often out of date and/or of poor quality, which drastically reduces overall trust in the data the organisation holds

#### **Unmet needs**

As an FCA user I need to have up-to-date and accurate data to work with, so that I can proactively monitor firms and make timely interventions to minimise harm to consumers and the market.

#### **Impact for the FCA**

Out-of-date and inaccurate data leads to potential crises when an unfolding situation can't be efficiently monitored



### 6 | Measurements



Measurements were not embedded in existing data systems and processes. Therefore, the data collection services cannot be effectively managed.

#### **Unmet needs**

There are limited quantitative measurements in place to allow the organisation to understand where the biggest opportunities for improvement are

#### **Impact for the FCA**

Measurements are mostly reactive and don't allow the FCA to understand the root cause of the problems. The FCA doesn't have a full picture on what data is being used and how.



### **Our hypotheses to test in the Alpha phase:**



- By ensuring a **shared understanding** of what prudential data the FCA needs to fulfil its mission and how it will use that data, the FCA will reduce the reporting burden on firms and itself.
- By providing solo-regulated firms with **simpler**, **clearer guidance and better data validation** at the point of data entry, the FCA will improve the quality, accuracy and timeliness of the reporting data those firms submit.



# Retail Banking Business Model Data





### Scope

We are doing a discovery about **the collection of Retail Banking Business Model Data** to understand how we can:

- improve efficiency of the process for firms and the FCA.
- improve quality of the data (mainly validity, accuracy, consistency and timeliness).
- provide access to this data for the relevant regulatory users efficiently and safely.



The Story so far

Colloquially called R2B2	Used to understand the market and how competition is working	3 rounds of collection since 2017	7 consecutive years of data from 2015	
Collected from 30- 50 firms each time	Approx. 2,499 data points on most recent collection	Resulted in 3 external publications (related to 2 of the collections)	4 main user groups: Banks, Competition, Supervision, Policy	
Underpins a number of further policy initiatives in the sector	Underpins supervision strategy in the sector	Used across 5 internal divisions	Used by BoE (inc. PRA) and HMT	

Who? me?

0

No, DATA!



### Phases, Stages and Steps – How we're building the map



A Phase - is made of stages and is very broad – contains stages



**A Stage** - contains steps and is carried out by one entity (i.e. firm) in a period of time



A Step - is a discrete task carried out by one person or team usually in one period of time



### **Journey Map**

#### **Emerging issues**

- Time-consuming to identify the right people
- Definitions are not aligned to businesses
- QA is quite manual and could be more thorough
- Reliance on others to access data



#### **Opportunities**

- Clearer context and purpose
- Support firms with interpretation
- Automation of cleaning
- Help users to discover and use data



### Next Sprint Goals (3)

- Identify what we most need to know to move into alpha/design
- Defining a golden thread with a 'Remedy' in mind
- User personas and identifying next UR steps
- Understand the supervision and policy data needs in more detail
- Understand the "other" retail banking data and PRA structure
- Defining metrics for improvement



# Incident, Outsourcing and Third Party Reporting (IOREP)

**Transforming Data Collection** 



### **IOREP Drivers & Goals**



### The IOREP use case is split into three distinct phases







Discovery and Design\* Q1 2023 – Q3 2023 Policy Consultation Q4 2023 - Q1 2024 Implementation\* from Q2 2024 (estimated to take 6-18 months)

\*to be delivered by external consultants

## **Discovery and Design activities for IOREP**



Gather internal and industry views in pre-consultation as part of the TDC Programme to inform development of the draft IOREP Policy.



Explore options for the delivery of incident and OATP reporting collections as part of the IOREP Service



Translate initial user requirements into an end-to-end representation of service journey



Undertake a technical discovery exercise on existing Bank and FCA systems



Deliver multiple design options for the IOREP Service

#### Bank of England

# Get Data Service: Counterparty Classification

**Transforming Data Collection** 



### Phase 1 discovery – initial problem statements

#### **Classification of Accounts Guide**





Classification instructions ("logic") lack standardisation and transparency



Definitions are not precise enough and are difficult to understand



This leads to different interpretations and data inconsistencies



Identifying and removing data inconsistencies leads to inefficiencies and costs on the side of firms and the Bank

### Phase 1 prototypes – tools intended to expose the logic

Three possible solution ideas were developed, which aimed to support firms in understanding the classification instructions.

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#### Matrix



**Decision Tree** 

#### **Classification Tool**

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#### Phase 1 prototypes – matrix and decision tree





**2** possible visualisations of the logic



Less ambiguous than written instructions



Matrix offers potential for a technical (machine-readable) implementation into firms' models/algorithms



Decision tree is more user-friendly and easier to understand

#### Phase 1 prototypes – classification tool

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Interactive tool



User-friendly and easy to understand/engage



Allows to query the "correct" classification based on the logic

### First round of user research/testing

We conducted user interviews with 6 participants in different roles (from 2 UK retail banks and 1 international bank).

#### Insights:

- 1. Instructions for Counterparty classifications are **difficult to understand**.
- 2. Firms built **workaround solutions** and **rely on algorithms** to generate classifications.
- Users at operational level (within large firms) do not read the classification instructions published by the Bank.
- 4. The internal **review** of classifications is mostly **triggered by queries from the Bank**. This leads to manual workload and costs at a **business level**.



#### Implications for prototypes:

- 1. Interviewees **could not see the relevance** of the solutions to their work.
- 2. They are **not implementable into automated processes** and cannot deal with large volumes of classifications.
- 3. They still give **room for interpretation**, and thus, human error.
- 4. They would not address the problem at a **business level**.

### Revised solution idea – aligning data

As a result, we intend to pivot to investigate on different solution ideas and the needs of smaller firms.





Provide a single source of reference data



Align classifications across databases

Reduce data inconsistencies and inefficiencies for firms and the Bank 



a SIC code

Eliminate the need for firms to individually map **Counterparty information and reduce reporting** costs at business level