

4 July 2014

## Thematic Peer Review on Supervisory Frameworks and Approaches to SIFIs

### Questionnaire for national authorities

#### Introduction

Increasing the intensity and effectiveness of supervision is a key pillar of the Financial Stability Board's (FSB) policy measures, endorsed by G20 Leaders, to reduce the moral hazard risks posed by systemically important financial institutions (SIFIs). This work has been led by the FSB Supervisory Intensity and Effectiveness (SIE) group, which issued its first recommendations in October 2010 for enhanced supervision of financial institutions, in particular of SIFIs.

The September 2013 *Report to the G20 on Progress and Next Steps Towards Ending "Too-Big-to-Fail"* (TBTF) recommended that the FSB launch by end-2014 "a peer review of supervisory frameworks and approaches to identify improvements and remaining challenges in supervisory practices for SIFIs, including the ability for supervisors to exercise judgement and more effectively challenge G-SIBs' risk management practices and decision making processes". Based on the findings of the review the FSB will, in coordination with the standard-setting bodies, develop policy recommendations, as appropriate, in areas where challenges and obstacles to effective supervision of SIFIs remain.

The peer review is being conducted in close consultation with the Basel Committee on Banking Supervision (BCBS) and takes stock of how supervisors have changed, or plan to change, their prudential supervisory framework and approach for G-SIBs and, as appropriate, other domestically significant banks (collectively referred to as SIBs in this questionnaire), and what changes they consider most significant for enhancing supervisory effectiveness.<sup>1</sup>

This review focuses on various elements of a prudential supervisory framework and approach for SIBs. The reference documents for the review are the recommendations of the FSB group on Supervisory Intensity and Effectiveness (SIE); relevant standards published by the BCBS; and other publications as relevant (refer to Annex A). In particular, the peer review focuses on:

1. **Supervisory mandate, strategy and culture.** Since the global financial crisis, SIB supervision has changed, in particular moving from point-in-time risk assessment to being more forward looking and anticipatory. This shift in approach to SIB

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<sup>1</sup> While acknowledging that supervisory frameworks for non-bank SIFIs should be reviewed in due course, SCSI members agreed to focus on banks (particularly G-SIBs) in the first instance as implementation was most advanced in this area. Complementing this peer review is the BCBS work on how bank supervisors (not just of G-SIBs) judge the impact of their policies and actions, manage against that impact, and then give an account of this impact to their external stakeholders.

supervision requires a significant change in culture within supervisory authorities to support the ability to make credible judgements and act on them.

2. **Organisational structure.** Many supervisory authorities have restructured their organisation to implement a more intense approach to SIB supervision, such as establishing dedicated supervisory teams for SIBs versus other banks, forming and using risk specialist teams, and establishing mechanisms to support a holistic approach to risk assessments.
3. **Supervisory approach, methods and tools.** To support their forward looking approach, supervisors are exploring and using a range of methods and tools, such as stress testing, business model analysis, and horizontal or thematic reviews.
4. **Cooperation.** More effective information exchange and supervisory cooperation helps to identify emerging risks and facilitate better use of available resources (at both supervisory authorities and G-SIBs) through enhanced cooperation between both domestic and international authorities and hence reduced duplication of activities.
5. **Operational independence and resources.** Supervisory authorities are assessing how best to approach the change management process needed to achieve more intense and effective supervision, and the more adequately skilled and effectively utilised resources that are required. The need for talent at supervisory authorities is affected by greater interaction with boards and senior management on issues such as risk appetite and risk culture, more focus on stress testing, and supervisory review and intervention in relation to capital models.
6. **Lessons learned and next steps.** The sharing of supervisory experiences and a better understanding of the effectiveness of the changes made by supervisors in selected areas to increase supervisory intensity, as well as a better understanding of the challenges that remain, can provide catalysts for other supervisors to improve on their practices and explore new approaches and tools.

The primary source of information for the peer review will be responses provided to this questionnaire and a questionnaire for selected G-SIBs. FSB member jurisdictions are requested to provide a consolidated national response to the questionnaire, covering all supervisors and regulators responsible for the oversight of SIBs. The consolidated response should include descriptions of differences in supervisory approaches to SIBs (in particular to G-SIBs) versus other supervised banks, as well as in the supervisory approach as a home or as a host supervisor of a SIB. Where these exist, the consolidated response should provide examples to support your response and also describe the differences in supervisory requirements for each of the national authorities involved in SIB supervision. In order to limit the burden on FSB members and to avoid unnecessary duplication of information collection efforts, authorities can attach links to relevant documents (where available in English).

As part of this review, the FSB invites feedback from financial institutions, industry associations and other stakeholders on the areas covered in the questionnaire. Feedback should be submitted to the FSB ([fsb@bis.org](mailto:fsb@bis.org)) by **12 September 2014**.

## 1. Supervisory mandate, strategy, and culture

*Supervisors are re-considering their supervisory strategy and how to promote a supervisory culture that successfully supports enhanced supervisory effectiveness. Many supervisory authorities have reviewed their objectives to support this strategic shift, while some others are in the process of establishing a formal risk appetite framework in order to better utilise their supervisory resources and thereby hone their risk assessment processes. This general view of supervisory strategy and culture will set the foundation for understanding specific changes aimed at enhancing supervisory effectiveness in the various elements of the supervisory framework.*

- 1.1 Briefly describe any material changes that have been made to your mandate and/or powers since the global financial crisis to support enhanced SIB supervision.

*Response:*

- 1.2 Describe your jurisdiction's current supervisory strategy for SIB supervision, including the key foundational elements or principles underpinning risk assessments by supervisors. Please comment on the ways in which your strategy provides flexibility to respond to changing risks or other supervision priorities.

*Response:*

- 1.3 Describe any significant changes that have been made to your supervisory strategy since the crisis, and provide the rationale for those changes. In particular, please identify any changes made in response to policy initiatives such as macroprudential supervision and recovery and resolution planning.

*Response:*

- 1.4 Describe whether, and if so how, your supervisory culture has changed in order to support your supervisory strategy. Outline the key elements of your operating environment or supervisory culture that either enhance or hinder the supervision of SIBs in your organisation, including, for example, the formation and review of required supervisory judgments, and the ability to effectively challenge G-SIBs' risk management practices and decision making processes. Do you use specific methods/approaches to promote a specific culture in your organisation?

*Response:*

- 1.5 Indicate whether a formal risk appetite framework has been established to support resource allocation and if so, outline its key elements or principles, including to what extent it relates to, or is different from, a risk-based approach to supervision. In

particular, please indicate how you define supervisory risk appetite (i.e. the level of risk supervisors are prepared to tolerate), and whether risk appetite is based on quantitative thresholds (e.g. the probability of failure) or on qualitative aspects articulated, for example, through supervisory procedures or guidelines, or in regulation or legislation.

*Response:*

- 1.6** Comment on the key benefits of the changes outlined in response to the questions above in terms of enhancing supervisory effectiveness and, where possible, provide specific examples. Also outline the key challenges in making these changes, and the next steps planned or anticipated, if any, to address any remaining gaps.

*Response:*

## **2. Organisational structure**

- 2.1** Describe your organisational structure for SIB supervision, including an overview of the major processes for SIB supervision workflow and how they are mapped into the organisational structure for SIB supervision (i.e. planning, reviewing/monitoring, follow-up processes); and to what extent activities are divided between dedicated SIB supervision teams and other specialist support areas (e.g. risk specialists, legal, research, statistics, etc.). What are the main differences between the organisational structure for SIB supervision and that for other supervisory units responsible for the supervision of other institutions? For example, are there different reporting lines to senior management of the supervisory authority, or in the number, level of seniority, capabilities and experience of staff in SIB vs other supervision teams?

*Response:*

- 2.2** Outline the processes, mechanisms or structures that are in place to coordinate the work and findings of the SIB supervision team and other supervisory and/or specialist areas (e.g. risk specialists, legal, research, statistics, etc.).

*Response:*

- 2.3** Outline how you achieve a holistic approach to SIB supervision and risk assessments as well as how key supervisory decisions are reached, including who has responsibility for key decisions such as supervisory findings and follow-up actions.

*Response:*

- 2.4** Describe the quality assurance and internal control processes in place to support judgment-making and the extent to which internal challenge and review is part of these processes. Indicate who participates in these challenge processes, and their frequency.

*Response:*

- 2.5** If you use third parties (e.g. external auditors or expert consultants) for SIB supervision, describe the process and standards for selecting third parties, the type of activities allocated to them, and the mechanisms to ensure third parties are independent and objective.

*Response:*

- 2.6** Describe the key changes made to your organisational structure for SIB supervision since the global financial crisis and provide the rationale for those changes.

*Response:*

- 2.7** Comment on the key benefits of these changes in terms of enhancing supervisory effectiveness and, where possible, provide specific examples. Also outline the key challenges in making these changes and the next steps planned or anticipated, if any, to address any remaining gaps.

*Response:*

### **3. Supervisory approaches, methods and tools**

*The [November 2010 SIE report on intensity and effectiveness of SIFI supervision](#) set out an initial set of recommendations where supervisory approaches and tools needed to be enhanced. This section takes stock of the current supervisory approaches, methods and tools employed by supervisors to develop a more comprehensive and forward looking risk assessment, and the changes made since the financial crisis that are considered more effective in enabling a more proactive and timely supervisory intervention.*

- 3.1** Describe your current approach to supervision of SIBs, including the key methods and tools used to develop a comprehensive risk assessment and identify areas for supervisory action or follow up. Indicate whether there is any difference in your supervision approach for SIBs (in particular G-SIBs) versus other supervised banks.

*Response:*

- 3.2** Describe the key changes made to your approach to SIB supervision since the crisis and the main drivers for the changes (e.g. lessons learnt from the crisis, evolution in the

regulatory framework, guidance from standard setting bodies), with particular reference to the areas below as relevant:

- a) Respective role of micro vs macro supervision;
- b) Balance between onsite and offsite supervisory activities;
- c) Use of commissioned third parties;
- d) Reliance on the work of a SIB's control areas (e.g. risk management function, internal audit, compliance);
- e) Balance between SIB-specific supervisory activities and horizontal or thematic reviews;
- f) Balance between qualitative information and quantitative data, and information or data provided by a SIB or from other external sources;
- g) Relative importance of ongoing "baseline" monitoring activities versus risk-based "deep dive" activities.

*Response:*

- 3.3** Comment on the key benefits of the changes in your supervisory approach for enhancing supervisory effectiveness and, where possible, provide specific examples.

*Response:*

- 3.4** Using the table in Annex B as a guide, describe the key methods and tools that support your approach to SIB supervision. In particular, please outline: (a) the key changes to these tools and methods that have been made to support development of a forward-looking supervisory view and more effective challenge of G-SIBs' risk management practices and decision-making processes; (b) the key implementation challenges encountered; (c) any remaining gaps in tools or methods and any further changes that are planned; and (d) how important this method and tool has been for enhancing SIB supervision, using a scale from 1 (very important) to 5 (not very important).

*Response:*

**3.5** Using the table in Annex C as a guide, describe how your supervisory practices in certain key areas have changed since the crisis in order to more effectively challenge G-SIBs' risk management practices and decision making processes. In particular, please outline (a) the key changes to these practices that have supported your ability to more effectively challenge G-SIBs' risk management practices and decision-making processes; (b) the key implementation challenges encountered; (c) any remaining gaps in practices and any further changes that are planned; and (d) how important this supervisory practice has been for enhancing SIB supervision, using a scale from 1 (very important) to 5 (not very important).

*Response:*

**3.6** Describe how your approach to supervisory actions and response to address supervisory findings has changed, for example the balance between formal and informal actions/response, through increased use of Pillar 2 capital adjustments, restrictions on business growth, heightened monitoring, or other actions/responses. Outline the effectiveness of these changes, with examples where possible.

*Response:*

**3.7** Outline how outcomes of supervision activities and assessments are communicated to SIBs, including whether they are informed of their relative performance with respect to peers, and any key changes made to your communication strategy since the crisis.

*Response:*

**3.8** Outline your approach to the prioritisation of supervision activities for a SIB, and any key changes made to this approach since the crisis. Describe how your approach to supervision adapts to changes in the risk environment as well as in a SIB's activities and business model, including how you achieve a good balance and allocation of resources between "planned" forward looking supervisory work on a rolling basis and effective "responsive" supervisory work that acts promptly to address emerging risks.

*Response:*

## 4. Cooperation

*To enhance effectiveness, supervisors should better leverage national and international cooperation, including via core supervisory colleges and other mechanisms that support enhanced cooperation. This section takes stock of whether the changes made to strengthen communication channels between domestic and international authorities have led to early detection of emerging risks, reduced duplication of supervisory activities, joint risk assessments or coordinated supervisory actions, as well as what further needs to be done to address remaining gaps.*

- 4.1** Describe the mechanisms for international cooperation and coordination for the supervision and resolution of a SIB, including formal (e.g. memoranda of understandings, colleges) or informal (e.g. bilateral) arrangements, as well as the level, nature and frequency of those engagements. Where relevant, describe any differences from your perspective as (a) a home supervisor and (b) a host supervisor of a SIB.

*Response:*

- 4.2** Outline the key changes to these mechanisms since the crisis and the rationale for these changes. In particular, with the establishment of crisis management groups (CMGs) for SIBs, outline how the supervisory college has evolved and its interaction with the CMG.

*Response:*

- 4.3** From the perspective of (a) a home supervisor and (b) a host supervisor of a SIB, outline the extent to which the changes made have led to enhancements in:

- a) joint or collaborative supervisory risk assessments,
- b) minimising duplication of supervisory activities,
- c) coordinated supervisory interventions,
- d) recovery and resolution planning,
- e) sharing of substantive information,
- f) communication with SIBs, or
- g) any other key enhancements.

*Response:*



4.4 Describe the key challenges in making these changes and outline what further needs to be done to improve the mechanisms for international cooperation, whether through supervisory colleges or otherwise.

*Response:*

4.5 Outline how, and to what extent, coordination with other domestic agencies assists in the effective supervision of a SIB in your jurisdiction. Describe the role, if any, of any non-supervisory authorities (e.g. finance ministries, consumer protection authorities, market conduct regulators) in the supervision of a SIB and the relevant mechanisms for coordination.

*Response:*

**5. Operational independence and resources**

*Recent IMF-World Bank FSAP/ROSC assessments have indicated that gaps still remain in several jurisdictions, including those that are home to a G-SIB, in the areas of operational independence and resources. Resources in particular determine the capacity to undertake supervisory plans, and supervisory authorities need to assess how best to approach the change management process needed and to achieve more adequately skilled and effectively utilised resources. This section takes stock of the actions taken by G-SIB home authorities to address the relevant FSAP recommendations in this area, and aims to assess whether supervisory authorities have adequate resources and how the resources are utilised to most effectively achieve desired supervisory objectives.*

5.1 For jurisdictions that are home to a G-SIB, provide in Table 5.1 below a detailed description of the actions taken to address the relevant recommendations on operational independence and resources from the most recent FSAP for your jurisdiction, and any further actions that are planned and the expected timeframe for their completion. If no actions have been taken or are planned in some areas, please indicate the reasons and/or any obstacles encountered in addressing the relevant recommendations. Also describe any remaining impediments (legal or otherwise) in taking prudential measures or actions regarding a G-SIB.

**Table 5.1: FSAP Recommendations**

<b>Relevant FSAP Recommendations</b>	<i>[will be specific for each G-SIB jurisdiction]</i>
Steps taken to date	
Actions planned and timeframes	

- 5.2** For jurisdictions that are home to a G-SIB, complete the table in Annex D by providing the number of full time equivalents (FTEs) for one G-SIB for each of the areas indicated. If the historical data for 2007/08 is not available, provide a pro-forma estimation (e.g. in case of mergers/takeovers) or a qualitative indication of the recent trend in resources (i.e. whether increasing or decreasing and by how much (minimal, significant etc.). Jurisdictions that are not home to a G-SIB may wish to complete Annex C for a large national SIB.

*Response:*

- 5.3** Describe whether, and if so how, the allocation of resources to SIBs relative to other supervised institutions has changed. For example, has there been an increase away from other supervised institutions or activities and if so, from where and by how much. Outline the adaptability of your resource allocation model, for example to enable staff that work on non-SIBs to be allocated to work on SIBs where needed for particular activities (such as horizontal or thematic reviews) or in case of exceptional contingencies. Considering your resource allocation model, also indicate whether the number of resources dedicated to SIB supervision is considered sufficient to achieve desired supervisory objectives, and if not, the areas where SIB supervision resources need to be supplemented.

*Response:*

- 5.4** Describe the change management initiatives undertaken to support integration of the changes to your supervision approach, methods and tools into your steady state practices or procedures for SIB supervisors. Outline how supervisors are handling the required changes and the impact of the changes on their daily work (with specific examples where possible). Describe the benefits of the changes for supervisors and any observed challenges in their implementation.

*Response:*

- 5.5** Describe whether, and if so how, the core competencies (e.g. required skills, years of supervisory experience, professional background) required of SIB supervisors have changed in your organisation and the processes in place (e.g. performance management, training) to obtain or develop those competencies. Outline any changes in your performance management, remuneration structure, recruitment channels or criteria to reflect developments in supervisory practices, and hence required competencies, for SIB supervision.

*Response:*

## **6. Lessons learned and next steps**

*Many of the changes described in the above sections are intended to improve effectiveness of SIB supervision. This section aims at understanding what processes or measures authorities have in place to evaluate whether increasing the intensity of supervision has changed its effectiveness, the changes that have been most effective and what challenges and further changes are needed in order to successfully implement a more effective approach to SIB supervision.*

- 6.1** Describe the key processes, methods and measures in place for evaluating the overall effectiveness of SIB supervision, including whether the same approach is applied across all (SIBs and other) institutions. In particular, outline the extent to which the evaluation focuses on outcomes versus activities, the degree to which it is qualitative versus quantitative, and the internal and external reporting of the evaluation. Outline any material changes to these processes, methods and measures for evaluating supervisory effectiveness since the beginning of the financial crisis and the rationale for these changes. If a formal evaluation process is not in place, indicate whether or not such a process is contemplated or being implemented, and the stage of development of the process.<sup>2</sup>

*Response:*

- 6.2** Describe what in your view have been the four to five most significant changes that you have made to enhance the effectiveness of SIB supervision and whether increasing the intensity of supervision has changed the effectiveness of SIB supervision.

*Response:*

- 6.3** Based on your own experience, what are the four to five biggest challenges remaining to enhancing the effectiveness of SIB supervision?

*Response:*

- 6.4** Beyond what has been described in your responses above, describe any additional planned changes to your supervisory framework and approach for SIBs. Also outline any further suggestions you have for improving the effectiveness of SIB supervision and any additional steps or measures you believe need to be taken in order to successfully implement a more effective approach to SIB supervision.

*Response:*

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<sup>2</sup> As noted in footnote 1, the BCBS is currently conducting a work on impact and accountability of bank supervision more generally, which includes undertaking a survey later in 2014 to examine these issues in detail. The responses to this question should therefore focus on highlighting the key aspects of the approaches adopted to evaluate effectiveness of SIB supervision and need not to provide the full details of the approaches used.

## **Annex A: Principles, Observations and Recommendations for Enhanced Supervision**

### **FSB publications**

FSB [Progress Report on Enhanced Supervision](#) (April 2014)

FSB [Guidance on Supervisory Interaction with Financial Institutions on Risk Culture](#) (April 2014)

FSB [Progress and Next Steps Towards Ending “Too-Big-To-Fail” \(TBTF\)](#) (September 2013)

FSB [Thematic Review on Risk Governance](#) (February 2013)

FSB [Increasing the Intensity and Effectiveness of SIFI Supervision](#) (November 2012)

FSB [Progress Report on Implementing the Recommendations on Enhanced Supervision](#) (October 2011)

FSB [Intensity and Effectiveness of SIFI Supervision: Recommendations for Enhanced Supervision](#) (November 2010)

FSB [Report on Reducing the Moral Hazard Posed by Systemically Important Financial Institutions](#) (November 2010)

### **BCBS publications**

BCBS [Core Principles for Effective Banking Supervision](#) (September 2012)

BCBS [Peer review of supervisory authorities’ implementation of stress testing principles](#) (April 2012)

BCBS [Principles for enhancing corporate governance](#) (October 2010)

BCBS [Principles for sound stress testing practices and supervision](#) (May 2009)

BCBS [Principles for Effective Risk Data Aggregation and Risk Reporting](#) (January 2013)

BCBS [Revised good practice principles for supervisory colleges \(consultative document\)](#) (January 2014)

### **Other publications**

Group of Thirty [A New Paradigm: Financial Institution Boards and Supervisors](#) (October 2013)

Group of Thirty [Toward Effective Governance of Financial Institutions](#) (April 2012)

IMF [The Making of Good Supervision: Learning to Say “No”](#) (SPN/10/08, May 2010)

Institute of International Finance (IIF) [Achieving Effective Supervision: An Industry Perspective](#) (July 2011)

Office of the Comptroller of the Currency (OCC) [An International Review of OCC’s Supervision of Large and Midsize Institutions: Recommendations to Improve Supervisory Effectiveness](#) (December 2013)

Senior Supervisors Group (SSG) [Progress Report on Counterparty Data](#) (January 2014)

SSG [Risk Management Lessons from the Global Banking Crisis of 2008](#) (October 2009)

## Annex B

*Response to question 3.4:* Using the table in Annex A as a guide, describe the key methods and tools that support your approach to SIB supervision. In particular, please outline: (a) the key changes to these tools and methods that have been made to support development of a forward-looking supervisory view and more effective challenge of G-SIBs’ risk management practices and decision-making processes; (b) the key implementation challenges encountered; (c) any remaining gaps in tools or methods and any further changes that are planned; and (d) how important this method and tool has been for enhancing SIB supervision, using a scale from 1 (very important) to 5 (not very important).

**Table A: Supervisory methods and tools to develop a forward looking supervisory view**

Supervisory method and tool	(a) Key changes made since the crisis and benefits for enhancing supervisory intensity	(b) Key implementation challenges	(c) Remaining gaps and planned changes	(d) Importance to enhancing SIB supervision <i>1 = very important to 5 = not very important</i>
a) Risk assessment system (e.g. CAMELS, ARROW, PAIRS)				
b) Business model analysis				
c) Stress testing				
d) Model validation and review				

Supervisory method and tool	(a) Key changes made since the crisis and benefits for enhancing supervisory intensity	(b) Key implementation challenges	(c) Remaining gaps and planned changes	(d) Importance to enhancing SIB supervision <i>1 = very important to 5 = not very important</i>
e) Horizontal or thematic reviews				
f) Recovery and resolution planning				
g) Identification and response to emerging risks				
h) Assessment of quantitative models outside of Pillar 1				
i) Supervisory data collection and analysis				
j) Other ( <i>please add additional rows as applicable</i> )				

## Annex C

*Response to question 3.5:* Using the table in Annex B as a guide, describe how your supervisory practices in certain key areas have changed since the crisis in order to more effectively challenge G-SIBs’ risk management practices and decision making processes. In particular, please outline (a) the key changes to these practices that have been made to support development of a forward-looking supervisory view and more effective challenge of G-SIBs’ risk management practices and decision-making processes; (b) the key implementation challenges encountered; (c) any remaining gaps in practices and any further changes that are planned; and (d) how important this supervisor practice has been for enhancing SIB supervision, using a scale from 1 (very important) to 5 (not very important).

**Table B: Practices in key supervisory areas**

Supervisory area	(a) Key changes made since the crisis and benefits for enhancing supervisory intensity	(b) Key implementation challenges	(c) Remaining gaps and planned changes	(d) Importance to enhancing SIB supervision <i>1 = very important to 5 = not very important</i>
a) Corporate governance				
b) Board engagement				
c) Board effectiveness assessment				

Supervisory area	(a) Key changes made since the crisis and benefits for enhancing supervisory intensity	(b) Key implementation challenges	(c) Remaining gaps and planned changes	(d) Importance to enhancing SIB supervision <i>1 = very important to 5 = not very important</i>
d) Fit and proper assessments of the board of directors and senior management				
e) Risk governance and management				
<ul style="list-style-type: none"> <li>• Risk appetite</li> </ul>				
<ul style="list-style-type: none"> <li>• Risk culture</li> </ul>				
f) Internal capital adequacy assessment (ICAAP)				
g) Other (please add additional rows as applicable)				



## Annex D

*Response to question 5.2:* For jurisdictions that are home to a G-SIB, complete the table in Annex C by providing the number of full time equivalents (FTEs) for one G-SIB for each of the areas indicated. If the historical data for 2007/08 is not available, provide a pro-forma estimation (e.g. in case of mergers/takeovers) or a qualitative indication of the recent trend in resources (i.e. whether increasing or decreasing and by how much (minimal, significant etc.)). Jurisdictions that are not home to a G-SIB may wish to complete Annex C for a large national SIB.

**Table C: Resources allocated to a G-SIB**

<b>Name of G-SIB:</b>	
<b>Asset size (end 2013):</b>	
<b>Business model:</b>	

	FTEs	
	2007/8	2014
<b>Within supervisory authority</b>		
a) “Pure” supervision (e.g. dedicated teams)		
• Off site		
• On site		
b) Horizontal reviews		
c) Stress testing		
d) Other specialist functions (e.g. modellers/quantitative specialists, accountants)		
e) Administrative staff		
f) Regulation (e.g. licensing, enforcement)		
g) Contingency		
h) Other		
<b>1. Total for supervisory authority (a – h)</b>		
<b>Outside the supervisory authority</b>		
i) Third parties (e.g. external auditors, consultants) to assist with supervisory oversight		

	FTEs	
	2007/8	2014
j) Host authorities		
<ul style="list-style-type: none"> <li>• Of which: staff permanently dedicated to the supervisory college.</li> </ul>		
<b>2. Total for outside the supervisory authority (i – j)</b>		
<b>3. Total (1+2)</b>		