



32ND XBRL EUROPE CONFERENCE
23RD MAY 2024
VALETTA, MALTA

SRB DATA COLLECTIONS & XBRL-CSV APPROACH

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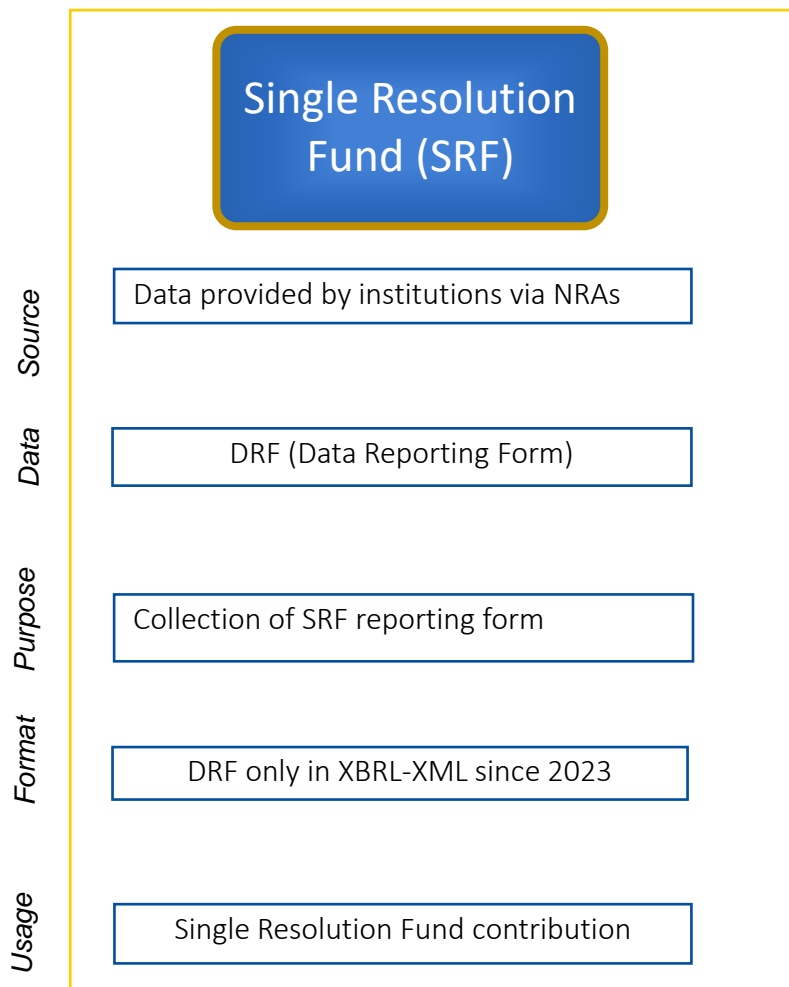
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Single Resolution Fund Data Collection

SRF data collection



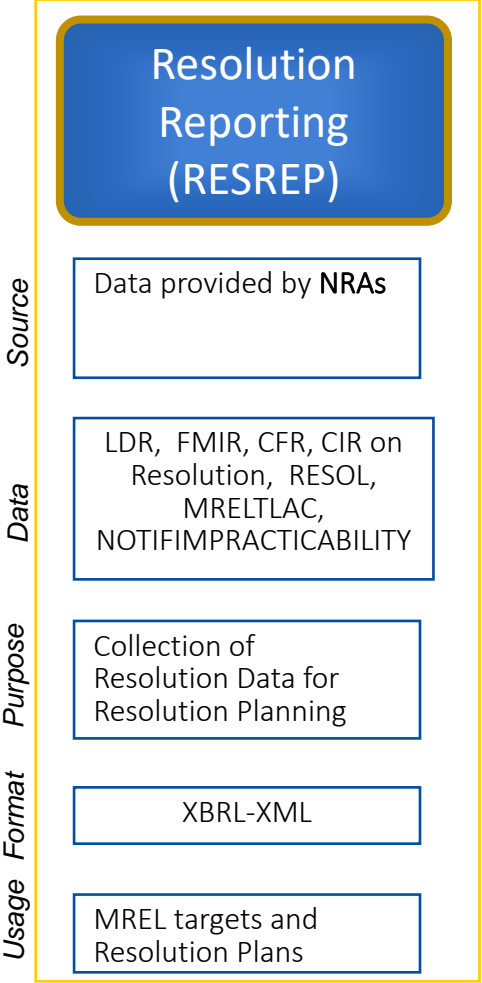
- The SRF at 31 December 2023 represented EUR 78 billion and therefore reached the target level of at least 1% of covered deposits held in the Member States participating in the SRM.
- No regular annual contributions will be collected in 2024 from the institutions falling in scope of the SRF, and contributions would only be collected in the event of specific circumstances or resolution actions involving the use of the SRF.
- Under normal circumstances, the target level verification exercise will be performed each year to confirm that the available financial means at the SRF are at least 1% of the amount of covered deposits of all credit institutions authorised in the Participating Member States. If the result of such exercise should prescribe so, the SRB will restart the regular collection of contributions to SRF. The industry will be informed accordingly.
- For the above mentioned reason, the data will be collected in 2025 (even if the SRF is not used) in order to perform the target level verification exercise. Therefore, the taxonomy for the 2025 cycle will be ready by July 2024 as usual.
- For SRF Data collection we will continue to collect the data in XBRL-XML (i.e. not adaptation to XBRL-CSV at the moment) with the current glossary.

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Resolution Reporting Data Collection and XBRL-CSV adoption approach

Current ResRep data collection



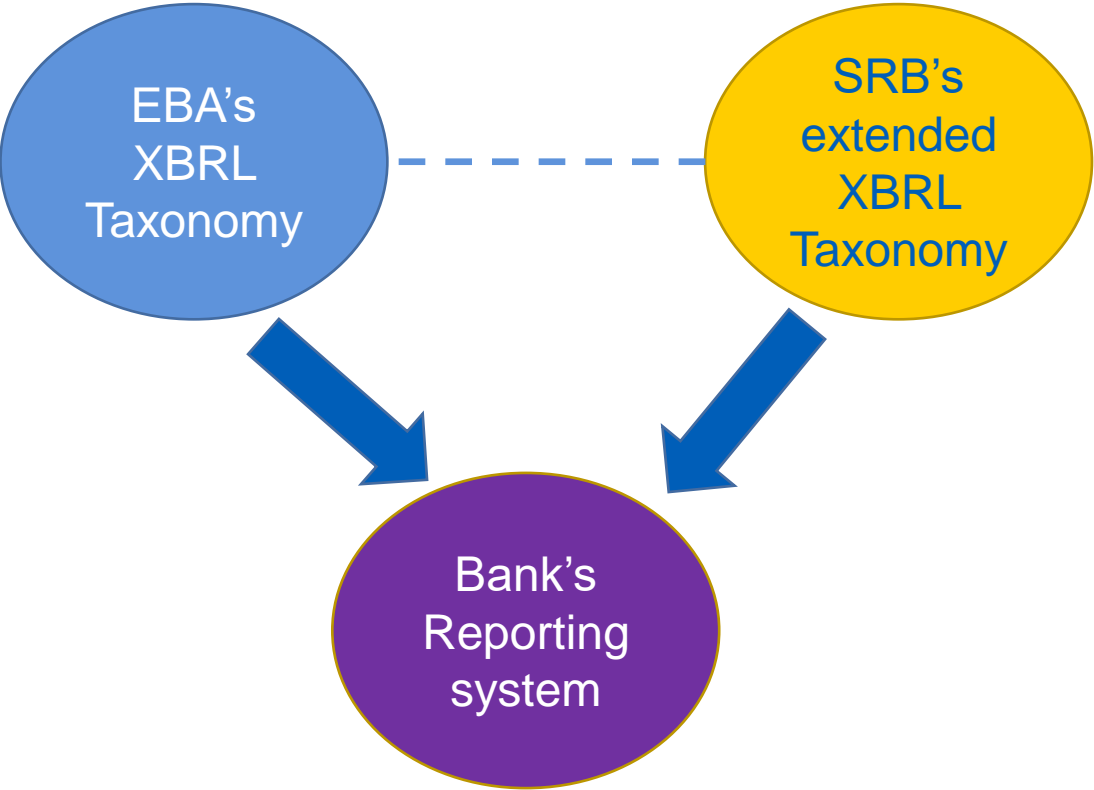
ResRep summary

	MREL TLAC reporting & disclosures	Art 55 Notifications	Resolution Reporting 2024
Format	Exclusively in XBRL	Exclusively in XBRL	Exclusively in XBRL
Frequency	Quarterly	Monthly	Annually
Sequential Reporting	Yes	No	Yes
Reporting Framework	EBA 3.2 (EBA 3.5 from ref. date 30-09-2024)	EBA 3.2 for reference date 31-12-2021 onwards	SIs: EBA 3.2 + SRB extension RES 8.0.2 LSIs: EBA 3.2
Guidance	Commission Implementing Regulation 2021/763	Draft EBA RTS/ITS	Commission Implementing Regulation 2018/1624

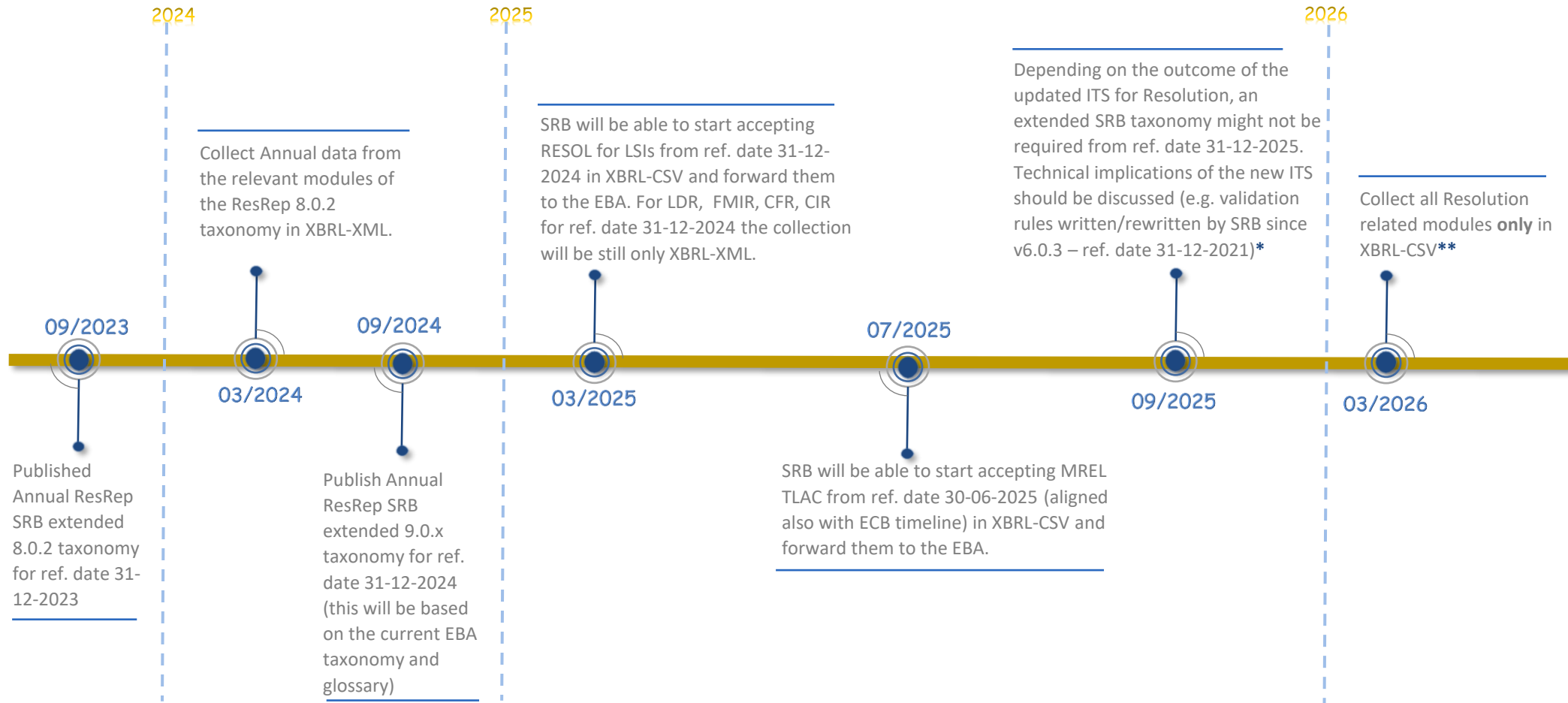
MREL Decisions

	MREL Decisions (Reported by the SRB for banks under its remit)
Format	XBRL (to the EBA)
Frequency	Annually EBA deadline : 31/05/2024 for RPC
Sequential Reporting	No
Reporting Framework	EBA 3.2
Guidance	Commission Implementing Regulation 2021/622

EBA/SRB Rules alignment examples



XBRL-CSV Adoption at the SRB - Draft Timeline



NOTES

* The changes under the proposed updated ITS on resolution planning will be covered in EBA taxonomy version 4.2 (Tentative Timeline communicated by the EBA. Taxonomy should be available in March 2025).

** Only re-submissions from ref. date 30-11-2025 for NOTIFIMPRACTICABILITY or/and ref. date 30-09-2025 for MREL TLAC or/and from ref. date 31-12-2024 for the annual modules (e.g. RESOL, LDR, etc.) will be accepted in XBRL-XML.

SRB Assessment and Proposal for XBRL-CSV with multiple facts per row for RES/SUP

- EBA defined an XBRL-CSV format having 1 fact per row (**data-point centric modelling**).
- At the SRB, we believe that the approach where each row contains 1 fact is not very efficient. We propose to define a ‘plain’ XBRL-CSV where a row can contain multiple facts for a given key (**table centric modelling**). The approach of the plain XBRL-CSV is also proposed by the EBA but only for the DORA CTPP Designation at the moment.

XBRL-XML	EBA XBRL-CSV (1 fact per row)	XBRL-CSV (multiple facts per row)
Full semantic dimensions associated to each fact	Simpler identification of fact by datapointID (as defined by the EBA)	Simpler identification of fact by row-column coordinates (same as in the annotated tables)
Many verbose text lines are necessary to report one fact (full dimensional context + metric & value)	One fact per row	Plain-tabular, multiple facts per row
Taxonomy as the Single Source of Truth	Taxonomy + EBA DPM database (MS Access)	Taxonomy as the Single Source of Truth

Could apply for all Regulatory Reporting modules (RES, SUP, etc.)

SRB Assessment and Proposal on XBRL-CSV (2)

During the 15th EBA IT Technical Group (13 March 2024), EBA presented the following on ‘**Why SUP/RES XBRL-CSV reports with one fact per row CSV structure**’. This structure was decided together with TFERF members in 2020-2021 considering the following constraints and characteristics or SUP/RES module modelling.

EBA

There are different kinds of tables in SUP/RES reporting modules (open row table, closed table, open sheet table etc.), it is logic to propose a single data structure for all these different type of tables.

- **SRB proposal: The approach we suggest with a plain XBRL-CSV, multiple facts per row can be defined regardless if the table is open row or closed or open sheet.**

EBA

We have also multiple currencies module in SUP/RES domain, one fact per row structure provide the possibilities to indicate different currencies reported for any monetary fact.

- **SRB proposal: A currency column can be created for the modules that are using multiple currencies. This currency column can be considered as an ‘attribute’ to the amount (and therefore the current ‘multiple currency unit’ of XBRL can be bypassed)**

EBA

Data point is used to identify each fact because data point is a stable identifier for each data being reported (it does not change from one module version to another module version) .

- **SRB proposal: The data point ID might not change but the table coordinates that define a data point don’t change neither (even if the metric and context change between releases). The proposal with the plain XBRL-CSV (with multiple facts per row) is based on the table coordinates (that define a data point).**

Visual differences (Open Tables)

T 03.01 (LDR) – Annotated table

T 03.01 - Intragroup liabilities													
Rows	Number	Reconciliation with aggregated data		Intragroup liabilities	Contract identifier	Entity name of lending entity	Identifier of Lending Entity (preferably LEI)	Type of Identifier	Relationship of lending entity with issuing entity	Is lending entity included in the resolution group of reporting entity?	Governing law	If this contract is required	
	0010	0020	0021	0030	0040	0045	0050	0053	0055	0057	0060	0070	
Row ID (Intragroup liability)	999	<Row ID (Intragroup liabilities)>	418071 [Row reference (aggregate template)]	418165 [Column reference (aggregate template)]	418077 [Ranking in insolvency]	418084 text	423757 text	410400 text	428661 [Type of Identifier]	428670 [Relationship of lending entity with issuing entity]	429083 TRUE/FALSE	418090 [Country the law of which governs the contract / master agreement]	[Cont of
Metric		(ei597) Row reference (aggregate template) [ei:ZZ.ZZ27_1]	(ei614) Column reference (aggregate template) [ei:ZZ.ZZ32]	(ei588) Ranking in insolvency [ei:ZZ.ZZ28]	(si599) Contract identifier [si]	(si168) Name of entity (si) [si288] Entity code [si]	(ei706) Type of identifier [ei:AT:AT99]	(ei707) Relationship of lending entity with issuing entity [ei:RP:RP3]	(bi764) Entity is included in the resolution group of reporting entity [ei]	(ei600) Country the law of which governs the contract / master agreement [ei:GA:GA]	(ei601) Liabilities and Equity [MCK:29] All equity, All liabilities	(ei602) Liabilities and Equity [MCK:29] All equity, All liabilities	(ei603) Liabilities and Equity [MCK:29] All equity, All liabilities
(BAS:BA) Base				(BA:8) Liabilities and Equity	(BA:8) Liabilities and Equity	(BA:8) Liabilities and Equity					(BA:8) Liabilities and Equity	(BA:8) Liabilities and Equity	(BA:8) Liabilities and Equity
(MCK:MC) Main category				(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities	(MCK:29) All equity, All liabilities
(OFS:OF) Own funds													
(MCH:MC) Main category of collateralised item													
(MCK:MC) Main category of item that is the object of the transaction / contract													
(IDL:ID) Row ID (Intragroup liabilities)		(ID:) <key value>											
(RPR:RP) Related parties/Relationships				(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group	(RP:34) Intra-group
(ROL:RO) Role in the contract						(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor	(RP:43) Investor, creditor
(MRE:BT) Eligibility for MREL													

- The XBRL-CSV with 1 fact per row could be complicated and not so easy to read as multiple lines are required to represent one row of the annotated table (which are grouped by IDL – which represents the row in the open annotated table).
- The data point version id is used in the specific transformation example (from multiple facts to one fact). However, when automating this in a proper XBRL-CSV with one fact per row, the data point ID should be taken into account (which could also not be the same with the data point version id some times). The source of truth for the data point id is the DPM.

EBA XBRL-CSV Structure One fact per row

datapoint,factValue,IDL
dp418071,eba_ZZ:x240,1
dp418165,eba_ZZ:x291,1
dp418077,eba_ZZ:x262,1
dp418084,eba_ZZ:x262,1
dp423757,Counterparty,1
dp410400,456ABC153,1
dp428661, eba:ATsi7,1
dp428670, eba_RP:x56,1
dp428670,TRUE, 1

Example of Fact id = T_03-01.r_3.factValue → row id = 3rd line of data in the XBRL-CSV file (i.e. the physical line number in the XBRL-CSV file)

XBRL-CSV Structure Multiple facts per row

c0010	c0020	c0021	c0030	c0040	c0045	c0050	c0053	c0055	c0057	c0060	c0070	c0080	c0090	c0100	c0110	c0120	c0130
1	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345678	Counterpar	456ABC153	eba_AT:si7	eba_RP:x56	TRUE	eba_GA:FR	eba_ZZ:x32	184643.95	0.00	eba_CU:EU	1994-12-07	2019-01-01	201
2	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345679	Counterpar	123ABC465	eba_AT:si7	eba_RP:x57	TRUE	eba_GA:FR	eba_ZZ:x32	219177.89	0.00	eba_CU:EU	1999-12-29	2019-01-01	201
3	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345680	Counterpar	123ABC465	eba_AT:si7	eba_RP:x57	TRUE	eba_GA:FR	eba_ZZ:x32	8.00	0.00	eba_CU:EU	2012-01-04	2019-01-01	201
4	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345681	Counterpar	456ABC153	eba_AT:si7	eba_RP:x56	TRUE	eba_GA:FR	eba_ZZ:x32	20871.15	0.00	eba_CU:EU	1999-01-07	2019-01-01	201
5	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345682	Counterpar	456ABC153	eba_AT:si7	eba_RP:x56	TRUE	eba_GA:FR	eba_ZZ:x32	6837.50	0.00	eba_CU:EU	2004-01-09	2019-01-01	201
6	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345683	Counterpar	123ABC465	eba_AT:si7	eba_RP:x57	TRUE	eba_GA:FR	eba_ZZ:x32	3020.32	0.00	eba_CU:EU	2013-04-18	2019-01-01	201
7	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345684	Counterpar	456ABC153	eba_AT:si7	eba_RP:x56	TRUE	eba_GA:FR	eba_ZZ:x32	2479.34	0.00	eba_CU:EU	2005-03-23	2019-01-01	201
8	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345685	Counterpar	456ABC153	eba_AT:si7	eba_RP:x56	TRUE	eba_GA:FR	eba_ZZ:x32	613523.63	0.00	eba_CU:EU	2008-06-10	2019-01-01	201
9	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345686	Counterpar	123ABC465	eba_AT:si7	eba_RP:x57	TRUE	eba_GA:FR	eba_ZZ:x32	35720.00	0.00	eba_CU:EU	2003-12-22	2019-01-01	201
10	eba_ZZ:x24	eba_ZZ:x29	eba_ZZ:x26	ID12345687	Counterpar	123ABC465	eba_AT:si7	eba_RP:x57	TRUE	eba_GA:FR	eba_ZZ:x32	195599.95	0.00	eba_CU:EU	1999-12-29	2019-01-01	201

Example of Fact id = T_03-01.r_1.c0030 → row id = 1 because 1 is the value of the current row in column c0010 (i.e. the value which match with the row-column coordinate defined in annotated table)

Fact id (as explained by [XBRL International](https://www.xbrl.org/2016/03/15/faq)) = {table-identifier}.{row-identifier}.{column-identifier}

Visual differences (Closed Tables)

T 01.00.a (LDR) – Annotated table

T 01.00.a - Liability structure - outstanding amount		Columns						
		Households	Micro & SME	Corporates	Institutions	Other financial corporations	Government, central banks & supranationals	
		Outstanding amount	Outstanding amount	Outstanding amount	Outstanding amount	Outstanding amount	Outstanding amount	
		0012	0022	0032	0042	0052	0062	
Liabilities excluded from bail-in	0100	417580 €ES	417607 €ES	428262 €ES	417555 €ES	417678 €ES	417653 €ES	417702 €ES
Covered deposits (BRRD art. 44/2/a)	0110	417253 €ES	417254 €ES	428223 €ES	€ES	417257 €ES	417256 €ES	417258 €ES
Secured liabilities - collateralized part (BRRD art. 44/2/b)	0120	417490 €ES	417496 €ES	428246 €ES	417484 €ES	417514 €ES	417508 €ES	417520 €ES
Client liabilities, if protected in insolvency (BRRD art. 44/2/c)	0130	417264 €ES	€ES	428224 €ES	417262 €ES	417272 €ES	417270 €ES	417274 €ES
Fiduciary liabilities, if protected in insolvency (BRRD art. 44/2/d)	0140	417265 €ES	417268 €ES	428225 €ES	417263 €ES	417273 €ES	417271 €ES	417275 €ES
Institution liabilities < 7 days (BRRD art. 44/2/e)	0150	€ES	€ES	€ES	417548 €ES	417671 €ES	417646 €ES	€ES
System (operator) and CCP liabilities < 7 days (BRRD art. 44/2/f)	0161	460414 €ES	460416 €ES	460415 €ES	460413 €ES	460420 €ES	460418 €ES	460421 €ES

Fact id (as explained by [XBRL International](https://www.xbrl.org/2016/06/21/fact-ids)) = {table-identifier}.{row-identifier}.{column-identifier}

EBA XBRL-CSV Structure One fact per row

datapoint, factValue
417580, 25221259467
417607, 787504842
428262, 42637743
417555, 872679379
417678, 148722392
417653, 0

Example of Fact id = T_01-00-a.r_4.factValue

XBRL-CSV Structure Multiple facts per row

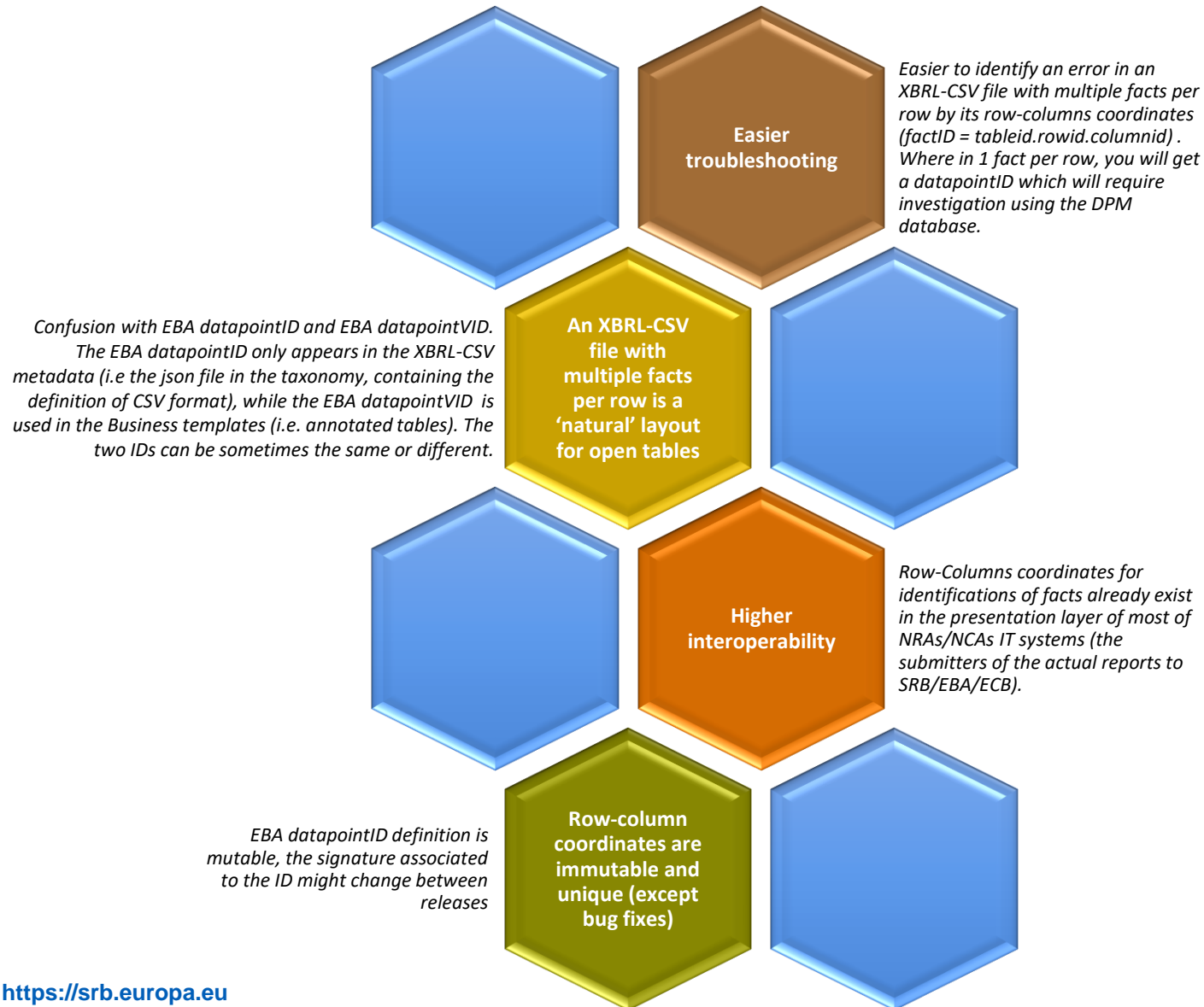
rancode	c0012	c0022	c0032	c0042	c0052	c0062	c0082	c0092	c0102	c0122	c0132	c0142
r0100	25221259467	787504842	42637743	872679379	1487223920	0	65519550	0	445169481	28921994383	2183187946	0
r0110	25154395467	787504842	42637743	0	0	0	1147133	0	479881	25986165066	0	0
r0120	0	0	0	637346426	1487223920	0	39854017	0	0	2164424362	2124570346	0
r0130	0	0	0	0	0	0	0	0	0	0	0	0
r0140	0	0	0	0	0	0	0	0	0	0	0	0
r0150	0	0	0	176715354	0	0	0	0	0	176715354	0	0
r0161	0	0	0	0	0	0	0	0	403928000	403928000	0	0
r0170	66864000	0	0	0	0	0	0	0	0	66864000	0	0
r0180	0	0	0	58617600	0	0	0	0	40761600	99379200	58617600	0
r0190	0	0	0	0	0	0	24518400	0	0	24518400	0	0
r0200	0	0	0	0	0	0	0	0	0	0	0	0
r0210	0	0	0	0	0	0	0	0	0	0	0	0
r0300	1102302114	451917942	1946887746	6238016865	433647659	420051124	1553212799	0	355210581	12081195705	6163469417	0
r0310	1094304250	451917942	0	0	0	0	0	0	0	1546222191	0	0
r0311	1052164377	413428182	0	0	0	0	0	0	0	1465592559	0	0
r0312	11776906	6868501	0	0	0	0	0	0	0	18645406	0	0
r0313	9101762	10896847	0	0	0	0	0	0	0	19998610	0	0
r0314	21261204	20724412	0	0	0	0	0	0	0	41985616	0	0
r0320	0	0	1946887746	1506681	433586857	420051124	1553212799	0	981	3935195064	2436420	0
r0321	0	0	1640448191	1506681	210081118	201091432	1427095797	0	981	3279132768	2436420	0
r0322	0	0	36771136	0	77152661	72589966	53705543	0	0	167629340	0	0
r0323	0	0	42611960	0	65313590	65271056	22512266	0	0	130437816	0	0
r0324	0	0	227056460	0	81039488	81098671	49899192	0	0	357995140	0	0
r0330	0	0	0	0	0	0	0	0	0	0	0	0
r0331	0	0	0	353077256	0	0	0	0	0	353077256	353077256	0
r0332	0	0	0	0	0	0	0	0	0	0	0	0

Example of Fact id = T_01-00-a.r_r0100.c0042



<https://srb.europa.eu>

Advantages of XBRL-CSV with multiple facts per row



New Specification: Unique key – foreign key constraints and mandatory columns in open tables

The XBRL International Granular data working group is currently working on a new specification that will improve support for large datasets characterised by many related open tables. The new specification will provide, for starters, an easy and quick way to enforce unique key (UK) – foreign key (FK) constraints and mandatory columns in open tables.

At the SRB, at the moment, since unique key (UK) – foreign key (FK) check is not possible at the taxonomy level, we perform it as a Level 3 check, after the submission and processing of the XBRL report file. Several examples can be found in our published document [‘SRB Level 3 data quality checks’](#). An example of unique key (UK) – foreign key (FK) constraints level 3 check is displayed below:

External ID	Status	Last Modified	Applicable from (reporting reference date)	Severity	Modules covered	Templates covered	Prerequisites - apply rule (only if specified tables are reported)	Rule Technical Description	External Data Used	External Data Reference	Error Message
SRBDQ_0265	Active	28/02/2021	31/12/2020	Warning	CIR	Z 10.02; Z 10.01	Z 10.02; Z 10.01	For each distinct $\{Z 10.02;c0010\} = (X)$ there is a corresponding $\{Z 10.01;c0010\} = (X)$	No	N/A	In tab 'Z 10.02 Mapping of Information Systems (CIS 2)', each distinct value in the column c0010 'System identification code' should also be provided in the column c0010 'Information system' of tab 'Z 10.01 Critical Information Systems (general information) (CIS 1)'

New Specification: Unique key – foreign key constraints and mandatory columns in open tables (2)

Furthermore, with the upcoming mandatory column checks, SRB rules like the **srb_e7493_e** (published on [SRB website](#)) will not be needed anymore which will also enhance performance.

The specific rule currently performs mandatory columns checks on the granular table T 06.01 - Other financial Liabilities (not included in other tabs, excluding intragroup), i.e. it checks for existence of value in specific columns.



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THANK YOU!