

Bank of England PRA

Appendices to CP21/25 – Future banking data review: Deletion of banking reporting templates

September 2025

Draft



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1: Summary table on the reporting templates proposed for deletion in this CP

Table A: List of templates deleted

Template code	Template name
PRA109	PRA operational continuity - pra109
C 05.01	Transitional provisions
C 05.02	Grandfathered instruments: instruments not constituting state aid
F 09.01.1	Off-balance sheet exposures: loan commitments, financial guarantees and other commitments given
F 09.02	Loan commitments, financial guarantees and other commitments received
F 10.00	Derivatives - trading and economics hedges
F 12.02	Transfers between impairment stages (gross basis presentation)
F 13.01	Breakdown of collateral and guarantees by loans and advances other than held for trading
F 13.02.1	Collateral obtained by taking possession during the period [held at the reference date]
F 13.03.1	Collateral obtained by taking possession accumulated
F 15.00	Derecognition and financial liabilities associated with transferred financial assets
F 16.02	Gains or losses on derecognition of financial assets and liabilities not measured at fair value through profit or loss by instrument
F 16.07	Impairment on non-financial assets
F 16.08	Other administrative expenses
F 18.01	Inflows and outflows of non-performing exposures - loans and advances by counterparty sector
F 19.00	Forborne exposures
F 21.00	Tangible and intangible assets: assets subject to operating lease
F 23.01	Loans and advances: number of instruments
F 23.02	Loans and advances: additional information on gross carrying amounts
F 23.04	Loans and advances: additional information on accumulated impairments and accumulated negative changes in fair value due to credit risk
F 23.05	Loans and advances: collateral received and financial guarantees received
F 23.06	Loans and advances: accumulated partial write-offs

F 24.01	Loans and advances: inflows and outflows of non-performing exposures
F 24.02	Loans and advances: flow of impairments and accumulated negative changes in fair value due to credit risk on non-performing exposures
F 24.03	Loans and advances: inflow of write-offs of non-performing exposures
F 25.01	Collateral obtained by taking possession other than collateral classified as property plant and equipment (pp&e): inflows and outflows
F 25.02	Collateral obtained by taking possession other than collateral classified as property plant and equipment (pp&e): type of collateral obtained
F 25.03	Collateral obtained by taking possession classified as property plant and equipment (pp&e)
F 26.00	Forbearance management and quality of forbearance
F 41.01	Fair value hierarchy: financial instruments at amortised cost
F 42.00	Tangible and intangible assets: carrying amount by measurement method
F 43.00	Provisions
F 44.01	Components of net defined benefit plan assets and liabilities
F 44.02	Movements in defined benefit plan obligations
F 44.03	Staff expenses by type of benefits
F 45.03	Other operating income and expenses
F 47.00	Average duration and recovery periods

2: Draft amendments to supervisory statement 34/15 – Guidelines for completing regulatory reports

In this appendix, new text is underlined and deleted text is struck through.

1 Overview

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Overview of the appendices

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Appendix	Data items	Description
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10	PRA109	Instructions for completing data item PRA109 <u>Removed XX Month 2026 (see Annex)</u>

4 Waiver from individual reporting of certain UK FINREP templates

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UK FINREP templates

Template 4.3.1	Financial assets at fair value through other comprehensive income
Template 4.4.1	Financial assets at amortised cost
Template 5.1	Loan and advances other than held for trading by product
Template 7.1	Financial assets subject to impairment that are past due
Template 9.1.1	Off-balance sheet exposures and commitments and guarantees measured at fair value: Loan commitments, financial guarantees and other commitments given <u>[DELETED]</u>
Template 12.1	Movements in allowances and provisions for credit losses

Template 12.2	Transfers between impairment stages (gross basis presentation) <u>[DELETED]</u>
Template 13.1	Breakdown of collateral and guarantees by loans and advances other than held for trading <u>[DELETED]</u>
Template 18	Information on performing and non-performing exposures
Template 19	Information forborne exposures <u>[DELETED]</u>
Template 20.4	Geographical breakdown of assets by residence of the counterparty
Template 20.7.1	Geographical breakdown by residence of the counterparty of loans and advances other than held for trading to non-financial corporations by NACE codes
Template 23.1	Loans and advances: Number of instruments <u>[DELETED]</u>
Template 23.2	Loans and advances: Additional information on gross carrying amounts <u>[DELETED]</u>
Template 23.3	Loans and advances collateralised by immovable property: Breakdown by LTV ratios
Template 23.4	Loans and advances: Additional information on accumulated impairments and accumulated negative changes in fair value due to credit risk <u>[DELETED]</u>
Template 23.5	Loans and advances: Collateral received and financial guarantees received <u>[DELETED]</u>
Template 23.6	Loans and advances: Accumulated partial write-offs <u>[DELETED]</u>
Template 24.1	Loans and advances: Inflows and outflows of non-performing exposures <u>[DELETED]</u>

Template 24.2	Loans and advances: Flow of impairments and accumulated negative changes in fair value due to credit risk on non-performing exposures <u>[DELETED]</u>
Template 24.3	Loans and advances: Inflow of write-offs of non-performing exposures <u>[DELETED]</u>
Template 25.1	Collateral obtained by taking possession other than collateral classified as Property Plant and Equipment (PP&E): Inflows and Outflows <u>[DELETED]</u>
Template 25.2	Collateral obtained by taking possession other than collateral classified as Property Plant and Equipment (PP&E): Type of collateral obtained <u>[DELETED]</u>
Template 25.3	Collateral obtained by taking possession classified as Property Plant and Equipment (PP&E) <u>[DELETED]</u>
Template 26	Forbearance management and quality of forbearance <u>[DELETED]</u>
Template 47	Average duration and recovery periods <u>[DELETED]</u>

Appendices

- 10 **Instructions for completing PRA109 – Operational continuity** see <https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/regulatory>
<https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/regulatory-reporting/banking/pr109-instructions.pdf>
 Removed XX Month 2026 – see Annex

Appendix 1 - Guidelines for completing data items FSA011 to FSA048 and PRA101 to PRA114

Name		Data item	Instructions
.....			
PRA109	Operational continuity	See Appendix 10 [DELETED]	See Appendix 10 [DELETED]

Appendix 8 – Details of UK FINREP templates and related reporting instructions

The reporting rules in the Regulatory Reporting Part of the PRA Rulebook refer to the following FINREP templates:

Templates 1.1, 1.2, 1.3	Balance Sheet Statement (assets, liabilities and equity)
Template 2	Statement of profit or loss
Template 3	Statement of comprehensive income
Template 4.3.1	Financial assets at fair value through other comprehensive income
Template 4.4.1	Financial assets at amortised cost
Template 5.1	Loan and advances other than held for trading by product
Template 7.1	Financial assets subject to impairment that are past due
Template 9.1.1	Off-balance sheet exposures and commitments and guarantees measured at fair value: Loan commitments, financial guarantees and other commitments given [DELETED]
Template 12.1	Movements in allowances and provisions for credit losses

Template 12.2	Transfers between impairment stages (gross basis presentation) <u>[DELETED]</u>
Template 13.1	Breakdown of collateral and guarantees by loans and advances other than held for trading <u>[DELETED]</u>
Template 18	Information on performing and non-performing exposures
Template 19	Information forborne exposures <u>[DELETED]</u>
Template 20.4	Geographical breakdown of assets by residence of the counterparty
Template 20.7	Geographical breakdown by residence of the counterparty of loans and advances other than held for trading to non-financial corporations by NACE codes
Template 23.1	Loans and advances: Number of instruments <u>[DELETED]</u>
Template 23.2	Loans and advances: Additional information on gross carrying amounts <u>[DELETED]</u>
Template 23.3	Loans and advances collateralised by immovable property: Breakdown by LTV ratios
Template 23.4	Loans and advances: Additional information on accumulated impairments and accumulated negative changes in fair value due to credit risk <u>[DELETED]</u>
Template 23.5	Loans and advances: Collateral received and financial guarantees received <u>[DELETED]</u>
Template 23.6	Loans and advances: Accumulated partial write-offs <u>[DELETED]</u>
Template 24.1	Loans and advances: Inflows and outflows of non-performing exposures <u>[DELETED]</u>
Template 24.2	Loans and advances: Flow of impairments and accumulated negative changes in fair value due to credit risk on non-performing exposures

	<u>[DELETED]</u>
Template 24.3	Loans and advances: Inflow of write-offs of non-performing exposures <u>[DELETED]</u>
Template 25.1	Collateral obtained by taking possession other than collateral classified as Property Plant and Equipment (PP&E): Inflows and Outflows <u>[DELETED]</u>
Template 25.2	Collateral obtained by taking possession other than collateral classified as Property Plant and Equipment (PP&E): Type of collateral obtained <u>[DELETED]</u>
Template 25.3	Collateral obtained by taking possession classified as Property Plant and Equipment (PP&E) <u>[DELETED]</u>
Template 26	Forbearance management and quality of forbearance <u>[DELETED]</u>
Template 47	Average duration and recovery periods <u>[DELETED]</u>

Appendix 10 – Operational continuity (in force from 1 January 2019) [Deleted in its entirety]

Name		Data item	Instructions
PRA109	Operational continuity	https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/regulatory-reporting/banking/pr109-data-item.pdf	https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/regulatory-reporting/banking/pr109-instructions.pdf

3: Cost benefit analysis (CBA)

Scope

2.29 The PRA expects the proposals to have a differential impact across firms reflecting the structure and complexity of firms' reporting obligations, rather than simply size alone. More specifically:

- Consolidation Groups¹ and Ring-Fenced Bodies (RFBs)² which typically report the full FINREP suite are expected to benefit from the largest number of deletions.
- UK Consolidation Groups³ benefit from fewer deletions but may experience a comparable or greater reduction in burden, reflecting the complexity of their reporting arrangements.
- Smaller firms, including those within Prudential Consolidation Groups⁴ are generally expected to realise more modest savings due to their narrower FINREP reporting requirements and lower complexity.
- Branches of overseas firms, which are only required to submit a single FINREP template not affected by these proposals, are not expected to be impacted.

2.30 The CBA reflects these scope differences. Estimated cost savings have been projected accordingly, taking into account the diversity of reporting obligations across firm types and the varying extent to which FINREP applies in practice.

Benefits

2.31 The PRA estimates that the proposed deletions would result in annual cost savings to industry of approximately £26.3 million, within a potential range of £22.4 million to £30.2 million. These savings reflect a broader reduction in reporting obligations and the associated

¹ As defined in the PRA Rulebook, means the undertakings that a firm is required to include in the scope of consolidation pursuant to Articles 18, 19 and 23 of the CRR and Groups 2.1 – 2.3. Available at: <https://www.prarulebook.co.uk/prarules/groups/03-09-2025>.

² This term is defined in Section 142A of Financial Services and Markets Act 2000. Available at: <https://www.legislation.gov.uk/ukpga/2000/8/section/142>.

³ As defined in the PRA Rulebook, Regulatory Reporting 1.2, means the consolidation group of a firm to which supervision on a consolidated basis by the PRA applies. Available at: <https://www.prarulebook.co.uk/prarules/regulatory-reporting/03-09-2025#85ab7d6e48f245b6afb768c451efb30>.

⁴ Prudential Consolidation Groups: Groups of firms that are consolidated for prudential regulatory purposes. These include parent companies and subsidiaries that are treated as a single entity for capital and risk reporting.

operational activities. This streamlining is anticipated to ease the administrative burden on firms and improve the efficiency of their reporting processes.

2.32 The estimated savings from ceasing to report are consistent with the ongoing compliance costs reported in the Basel 3.1 survey. These estimated costs reflect the steady-state burden of maintaining reporting processes, including data extraction, validation, assurance, and submission. The assumption is that deleting a template eliminates its associated ongoing compliance cost.

The range of estimates is based on a sensitivity analysis that accounts for gaps in the coverage of the Basel 3.1 survey and variation in reported costs, including uncertainties relating to ongoing costs, template complexity, firm size, and implementation efforts. Firms incur costs in preparing and submitting FINREP data to the PRA, reflecting internal processes, systems, and controls specific to each firm. While some of the data may still be required for internal or other regulatory purposes, removing the obligation to submit these templates to the PRA provides a clear and measurable benefit.

2.33 The estimate is based on a two-step approach:

- Step 1: Average per-template costs were calculated using Basel 3.1 cost-benefit survey responses, segmented by reporting entity type and firm size.
- Step 2: These segment-specific averages were applied to the number of firms in each reporting cohort to estimate total industry savings using a weighted average. Where data were unavailable, assumptions (detailed in paragraph 2.47) were applied to support extrapolation.

Firm Size	Estimated Industry Savings (£m)	Estimated Savings per Firm (£)
Small (assets < £20bn)	7.2	43,000
Medium (assets >£20bn<£250bn)	6.3	119,000
Large (assets>£250 bn)	12.7	410,000
Total annual industry projection	£ 26.3	

2.34 The figures are intended to provide an indicative estimate of potential savings and may not reflect the actual experience of individual firms. The categorisation of firms by size is necessarily broad and includes a range of business models and reporting obligations. For

example, the “small” firm category may include both a small building society with limited reporting requirements and a Consolidation Group with more extensive obligations.

2.35 As such, the estimated savings for each category should be interpreted as illustrative averages. Actual savings will also vary depending on firm-specific factors such as IT architecture, governance maturity, and level of automation.

2.36 The cost savings assume that all firms cease submitting the deleted templates following implementation. In practice, firms may adopt different timelines for discontinuing reporting, depending on internal system changes, governance cycles, or broader data strategies. The CBA does not attempt to model these variations but recognises them as a source of uncertainty.

2.37 The proposals also include changes to rules to improve clarity of remaining FINREP collections. These proposals are expected to generate further cost savings by reducing the interpretation burden on firms, particularly in determining which templates apply. The benefit of improved clarity is not quantified but is expected to reduce further compliance costs for firms as well as costs for supervisors.

Costs

Costs to firms

2.38 The PRA considers that the implementation costs associated with the proposed deletions will be minimal. Most of the templates identified for removal are supported by automated data feeds, and their removal is unlikely to require significant system reconfiguration. Where implementation effort is required, it is expected to relate to internal governance, documentation updates, or minor adjustments to reporting workflows.

2.39 The PRA has not included a quantitative estimate of implementation costs in the CBA. This reflects the low operational complexity of ceasing to report unused templates and the difficulty of isolating these costs from broader system maintenance activities.

Costs to the PRA

2.40 The PRA's own implementation costs are also expected to be limited. The changes involve routine activities such as disabling validations and ceasing ingestion of the deleted templates into internal systems, which do not require major system redevelopment.

Costs relating to firm resilience and financial stability

2.41 The proposals in the CP delete reporting templates that do not materially contribute to the PRA's supervisory and policy work. Consequently, the PRA considers the risk of a

reduction in firm resilience and/or financial stability and any associated economic costs arising from these deletions to be negligible.

Internal consultation has also determined that the proposals are unlikely to lead to additional ad hoc data collections (implying future costs to firms and PRA), either for crisis and resolution scenarios, or for policy development initiatives.

Overall assessment

2.42 Overall, the PRA assesses that the proposals in this CP would result in a net benefit to firms in quantitative terms. The PRA estimates that the total net benefit to firms would be around £26.3m annually with a sensitivity range of £22.4 million to £30.2 million. In addition, the proposals will deliver qualitative benefits, such as improved operational efficiency and reduced duplication.