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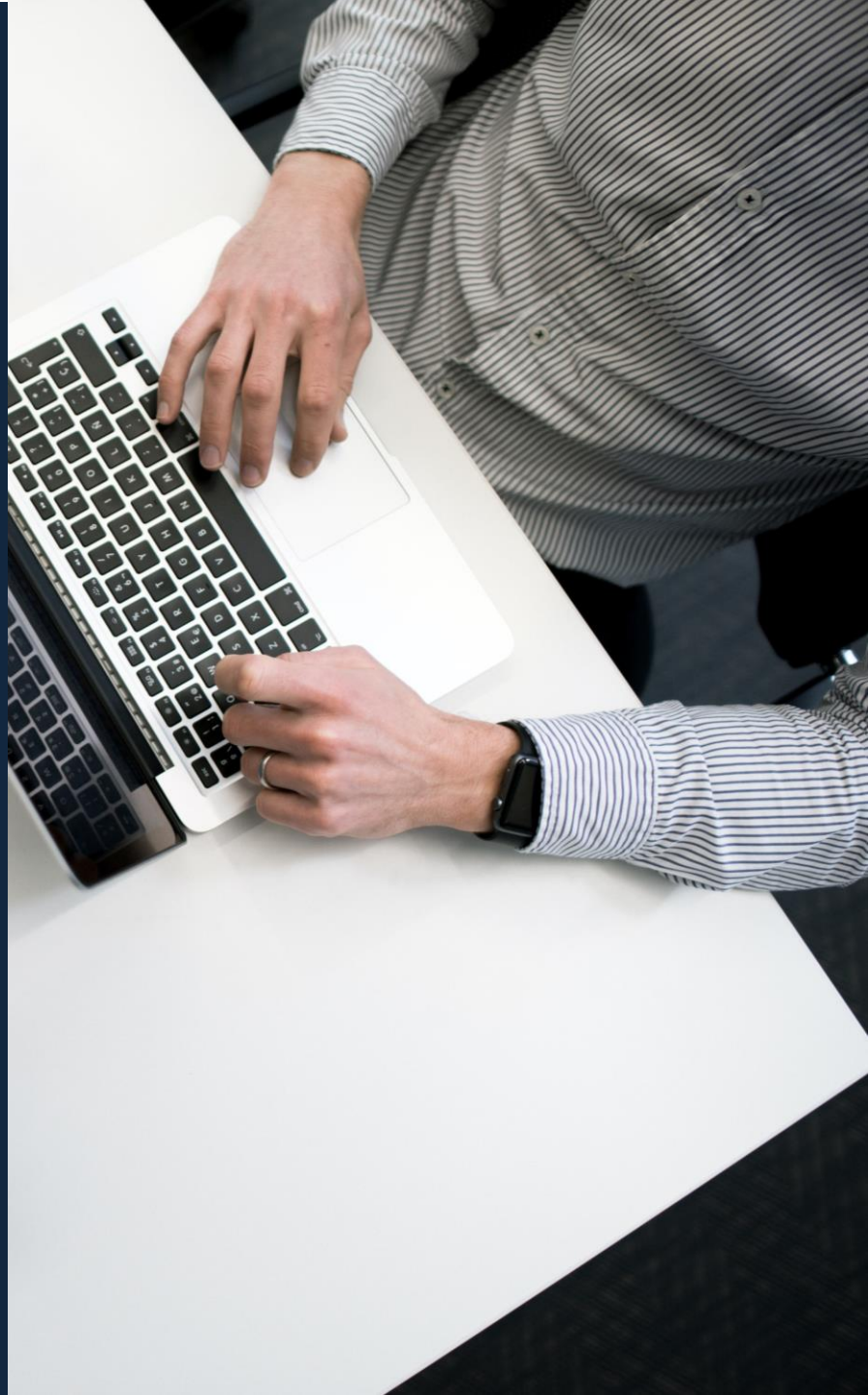
Transforming Data Collection (TDC)

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	Commercial Real Estate (CRE) data Incident, Outsourcing and Third Party Reporting Strategic Review of Prudential Data Collection Retail Banking Business Model
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

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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
Progress update • Overview of use cases • Progress update • Benefits	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**

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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

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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.

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What has TDC looked at so far?

You can view this section of the presentation recording here

TDC Overview – seven use cases

Phase one use cases (2021 – 2022)

1. **Financial Resilience Survey**
2. **Commercial Real Estate Data discovery**
3. **Quarterly Statistical (DQ) Derivatives Return**

Phase two use cases (2022 – 2023)

4. **Strategic Review of Prudential Data Collection from solo regulated firms**
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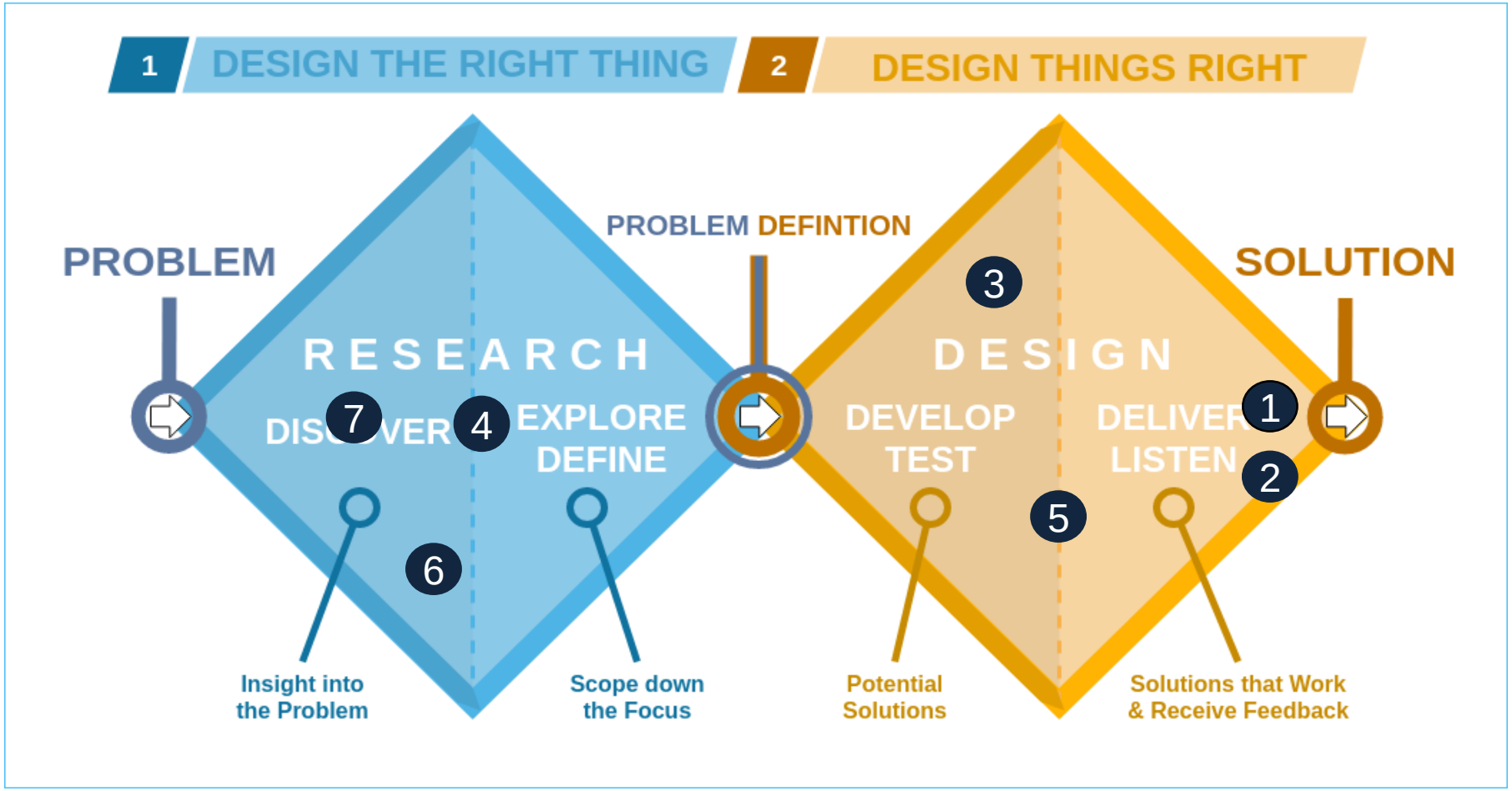
7. **Incident, Outsourcing and Third Party Reporting**

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?



Key

1. Financial Resilience Survey
2. Commercial Real Estate discovery
3. DQ Return
4. Prudential review
5. Commercial Real Estate (2)
6. Retail Banking Model
7. Incident Outsourcing and Third Party Reporting

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

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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

TDC Overview – seven use cases

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Update on implementation of phase 1 recommendations

Financial Resilience Survey (FRS)

Firm portal and home pages - Discovery

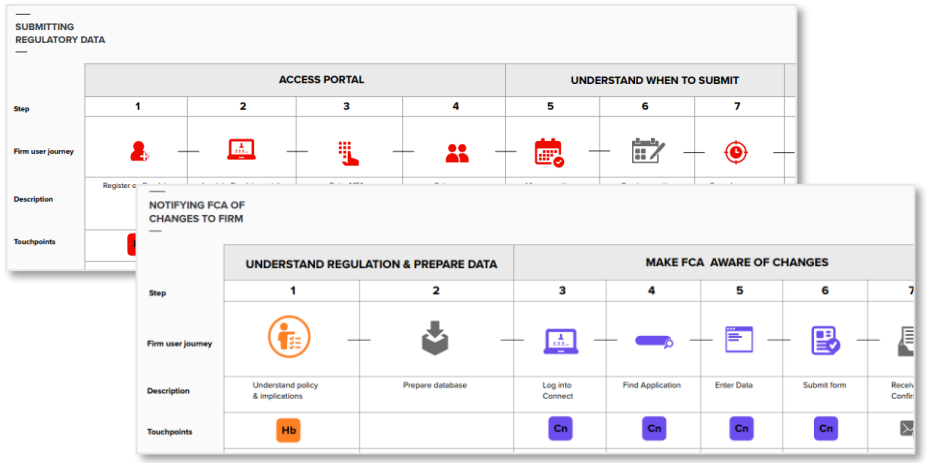
Firm view at a glance - Discovery

Intuitive form design – Alpha/Design

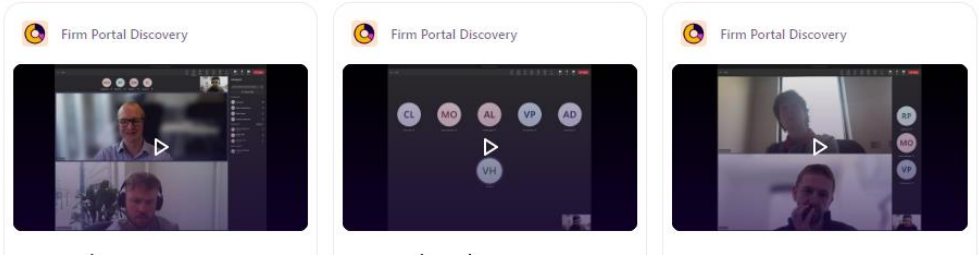
Future Financial Resilience Survey (and data collection process change) – Alpha/Design

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



What: User research into a unified regulatory reporting system

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

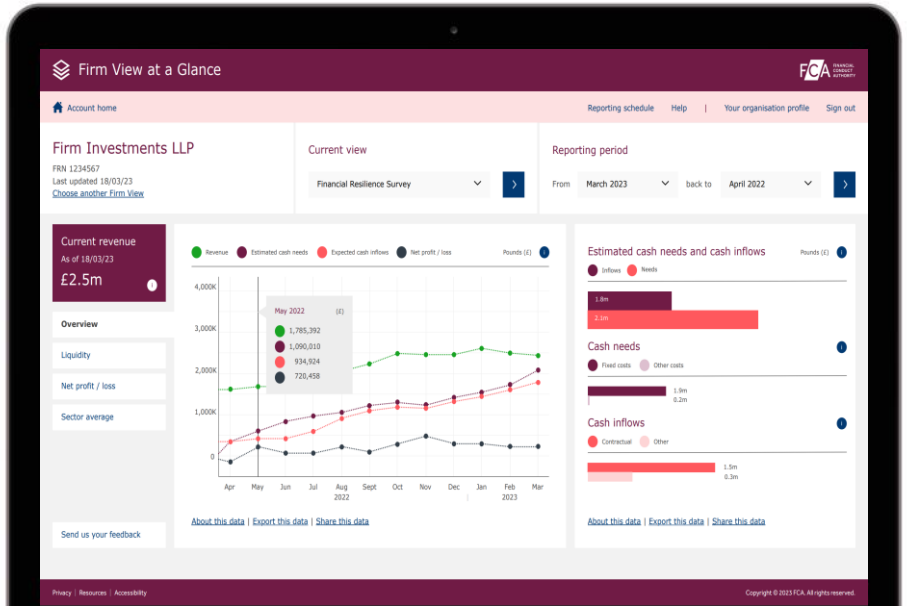
5. Access management issues

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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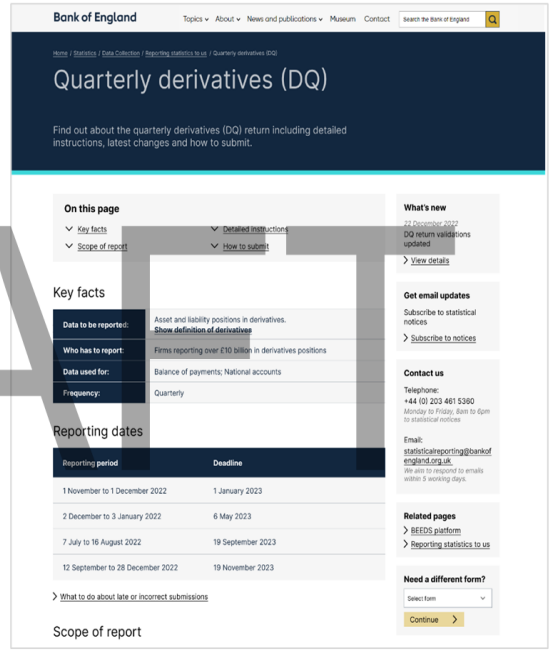
Update on implementation of phase 1 recommendations

Form DQ - Plan



DRAFT

- Better reporting landing pages
- Counterparty classification standardisation
- Restructured reporting instructions

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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

- Plain language, clearer definitions

Clearer instructions

- E.G Total revenue cannot be lower than credit related revenue

Validations

- The form is for calculating annual fee, monitoring permissions & risk assessment

Clear purpose

- Now available on 1 page and in fewer ‘clicks’

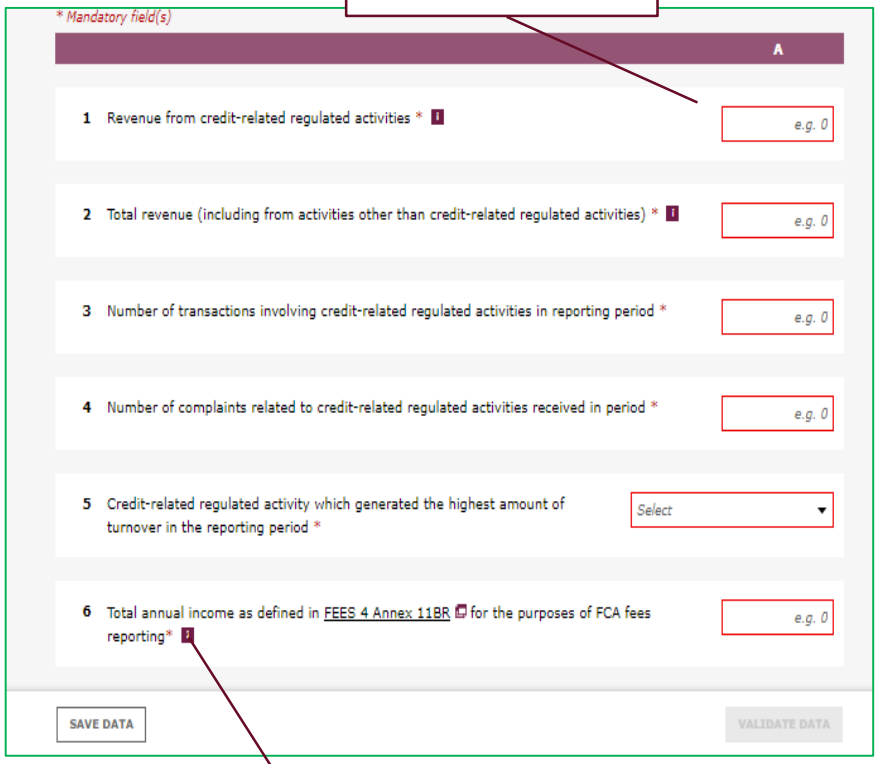
Access to guidance

- Firms are told the information they need upfront
- Increase to 60%

Accessibility

New design

Hard and soft validations



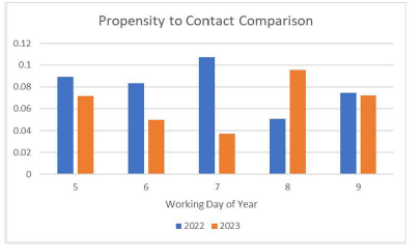
Quick links to specific guidance

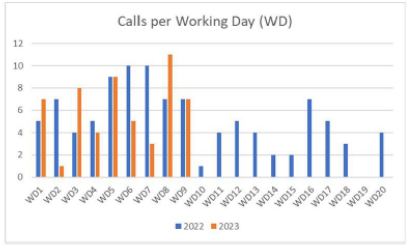
CCR007: Feedback so far

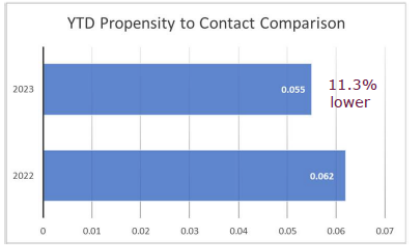
- Change went live January 2023
- Monitoring the **volume and type of calls** to FCA Supervision Hub
- Peak reporting is March and April 2023
- Total revenue reported has increased by £79m compared to last year

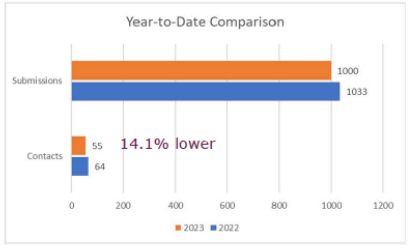
"The notes for question 6 are very good and really help me understand what figures I need to use" **Firm user**

"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

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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

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Commercial Real Estate (CRE) data

Where we are now

Discovery: Phase 1
COMPLETE

- **TDC Phase 1 (September 2021 to March 2022)**
- Explore business practices and processes
- Create problem statements
- Scope – some users of some BOE datasets

Discovery: Phase 2
COMPLETE

- **Oct. 7 until end-Jan**
- Revisiting due to criticality of this use case
- Explore business practices and processes
- User journey mapping Project roadmap
- Create problem statements

Alpha: Phase 2
IN PROGRESS

- **Jan. 23 until end-Jun**
- Prioritise problem statements
- Design workshops
- Product Canvas
- **Recommendations to governance committees**

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Incident, Outsourcing and Third Party Reporting (IOREP)

The IOREP use case is split into three distinct phases:

Where we are now

Discovery and Design*
Q1 2023 – Q3 2023

Recommendations
Q4 2023 – Q1 2024

Implementation* from Q2 2024
(estimated to take 6-18 months)

***to be delivered by external consultants**

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Strategic Review of Prudential Data Collection: Themes identified from Discovery

1. Guidance

2. Data input & validation

3. Data Adequacy

4. Training and Tooling

5. Data quality, trust and timeliness

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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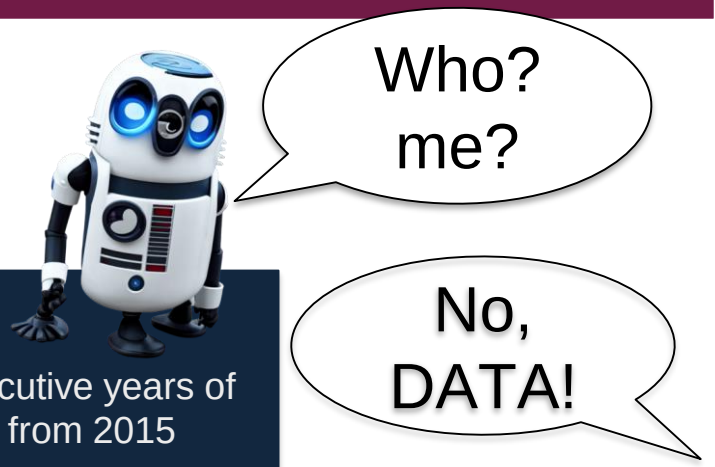
Retail Banking Business Model: Story so far

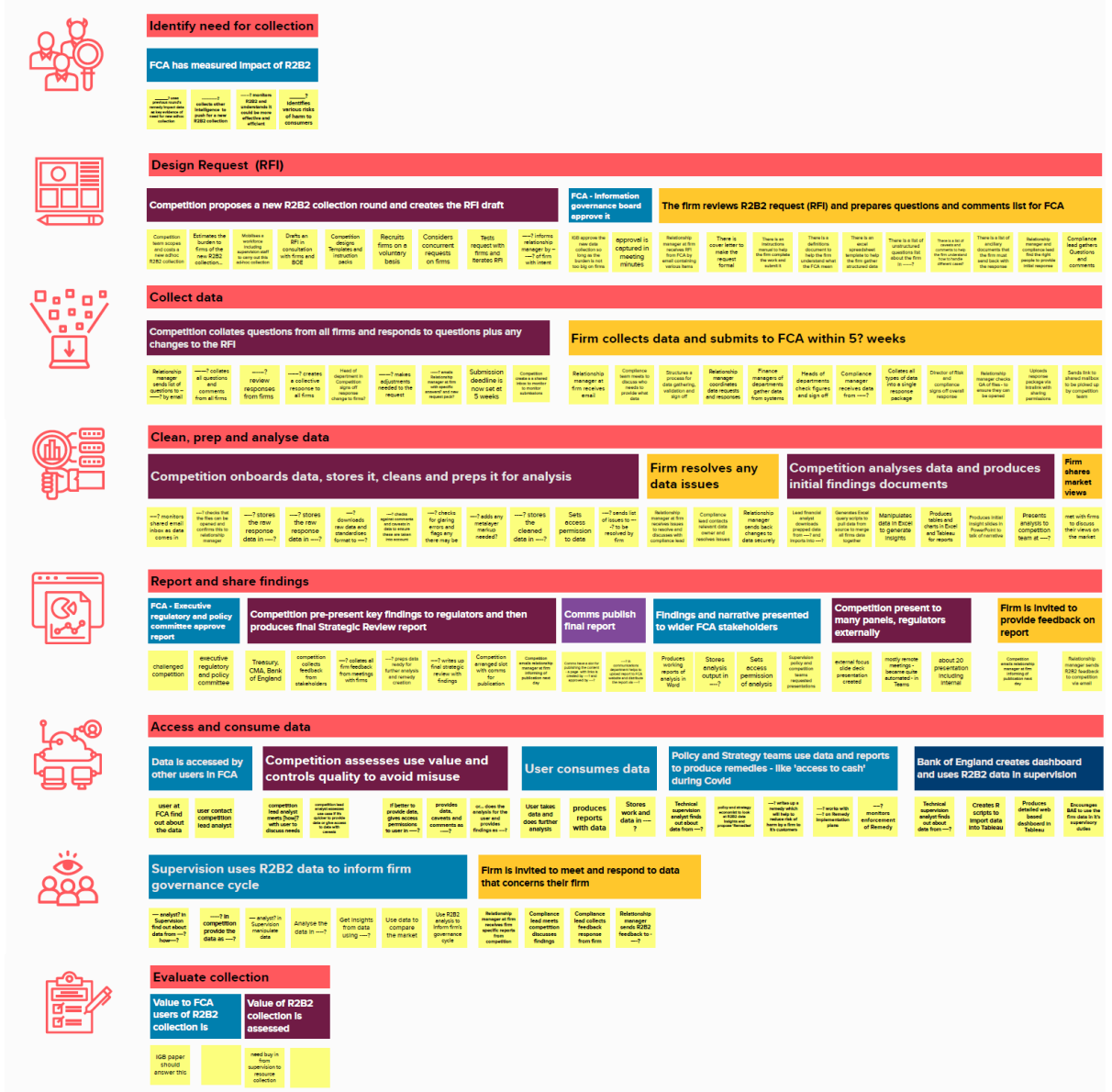


Colloquially called R2B2 by some	Understand the market and how competition is working	3 rounds of collection since 2017	7 consecutive years of data from 2015
Collected from 30-50 firms each time	Approx. 2,499 data points on most recent collection	Resulted in 3 external publications (related to 2 of the 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

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

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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

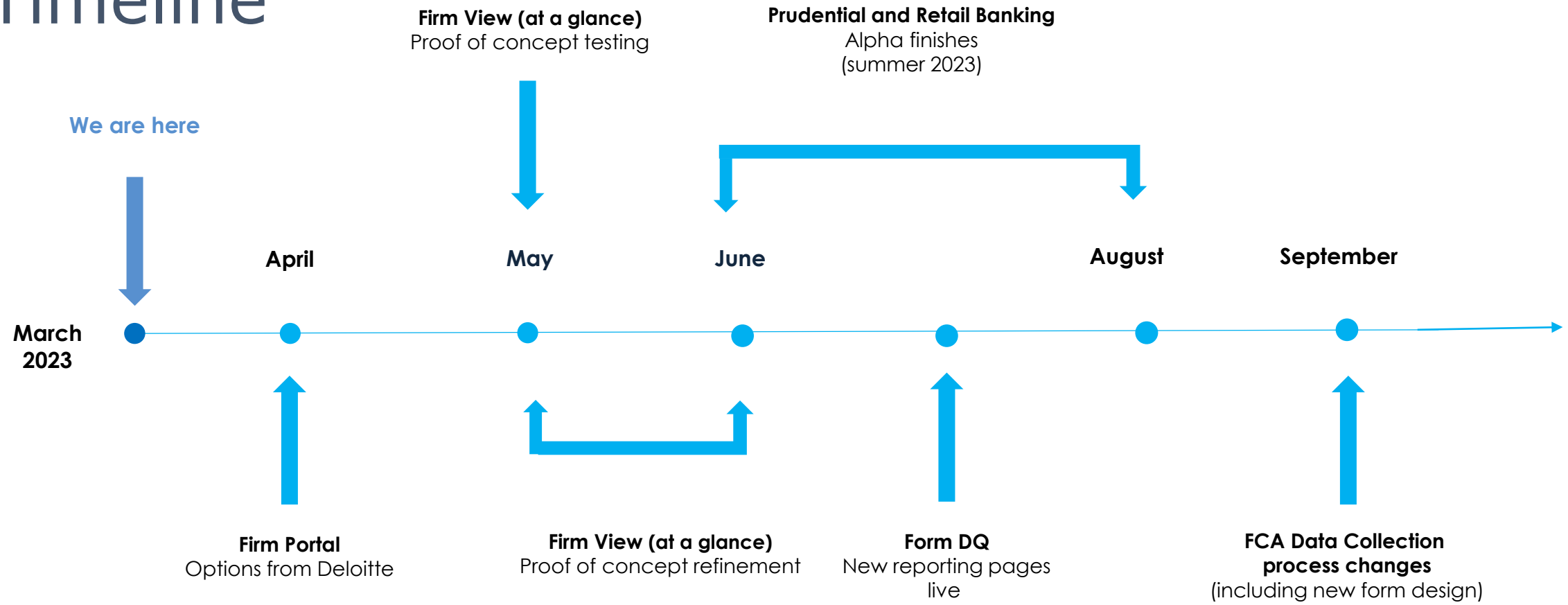
Transition State 2 – Test a new way of collecting data starting with the data need

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

Timeline


Firm View (at a glance)
Proof of concept testing
Prudential and Retail Banking
Alpha finishes
(summer 2023)
We are here
March 2023
April
May
June
August
September
Firm Portal
Options from Deloitte
Firm View (at a glance)
Proof of concept refinement
Form DQ
New reporting pages live
FCA Data Collection process changes
(including new form design)

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Closing remarks

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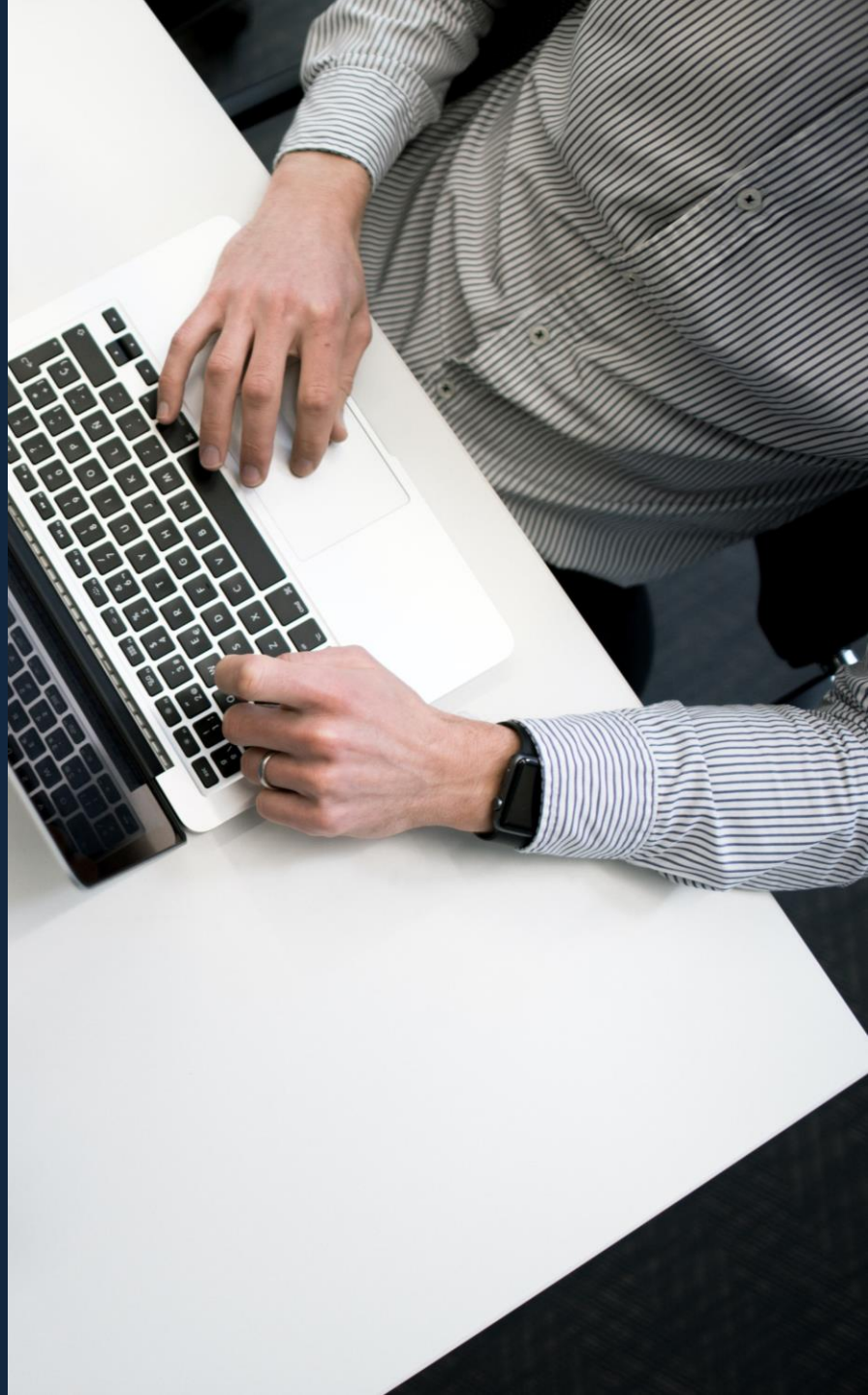
Showcase and networking session slides



29 March 2023

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Firm Portal

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

1. 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?

"Just getting to the heart of the what the FCA are looking for is sometimes half the challenge"

"Sometimes I think they're almost a mystical organisation"

"I don't think they look at what we send them *to be honest"*

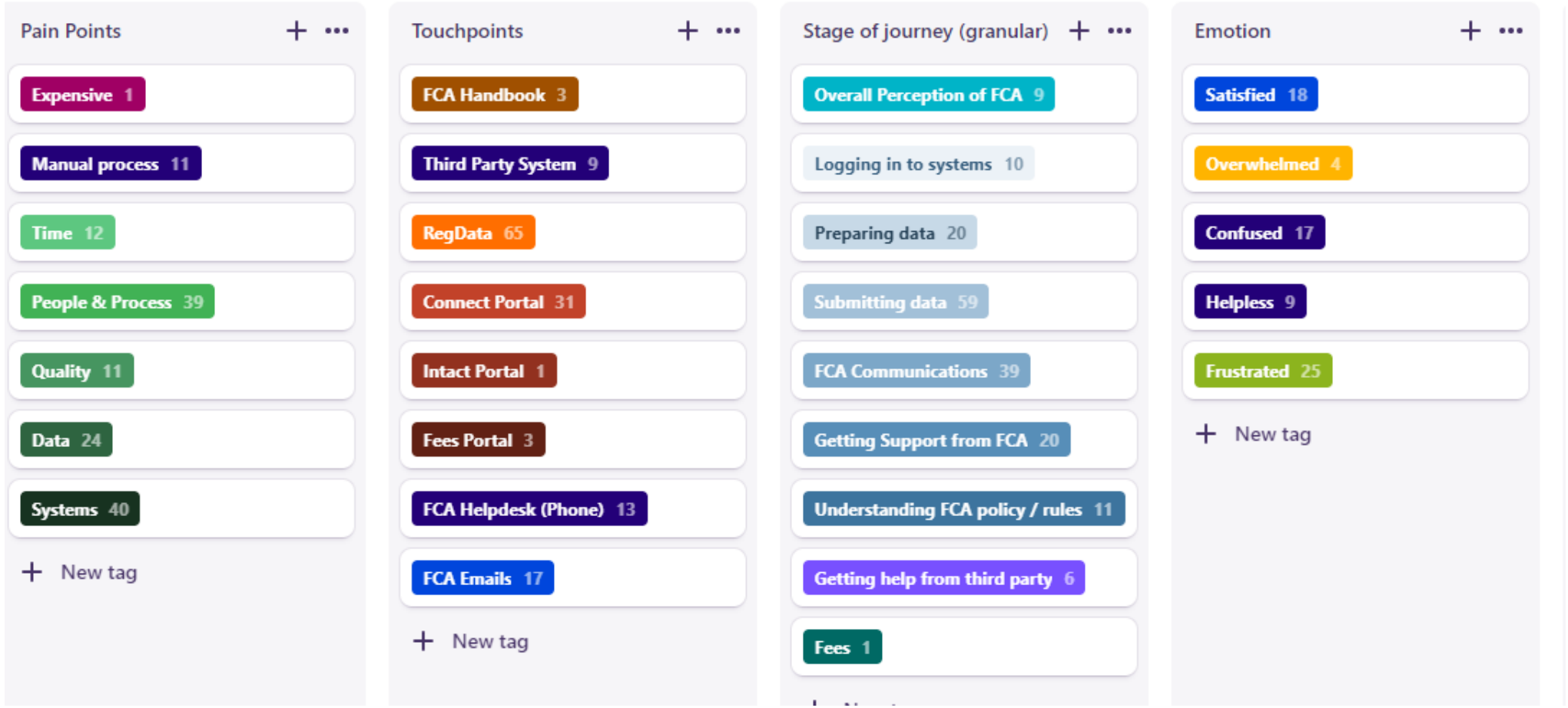
"Honestly, I don't understand why we have three systems - *I'd like one login instead of three"*

"We're not sure if the FCA is here to help or hurt us"

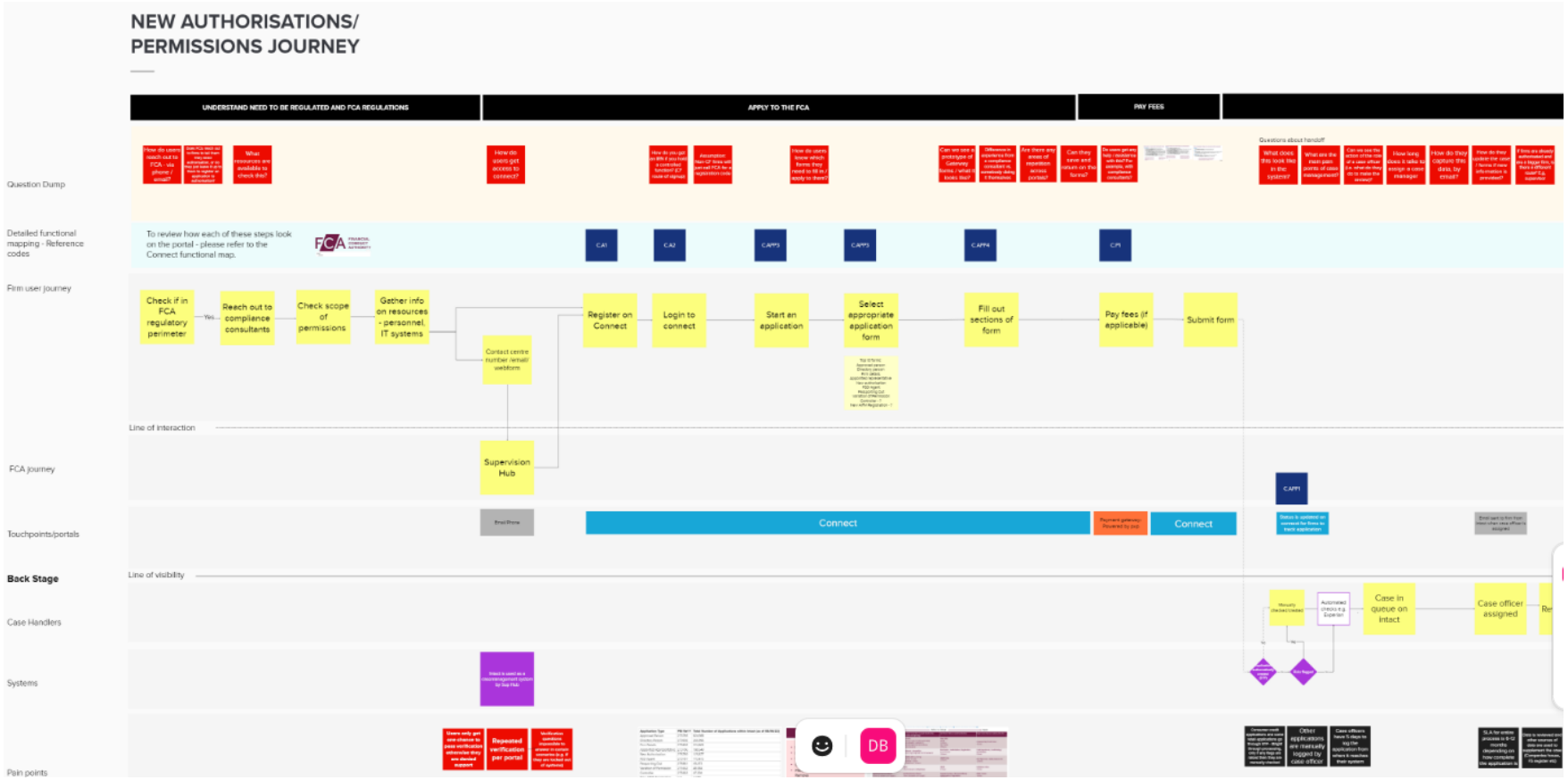
"Life's too short to call the FCA"

"We feel like we're left to fend for ourselves"

What comes next?
Categorising & tagging research outputs…



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



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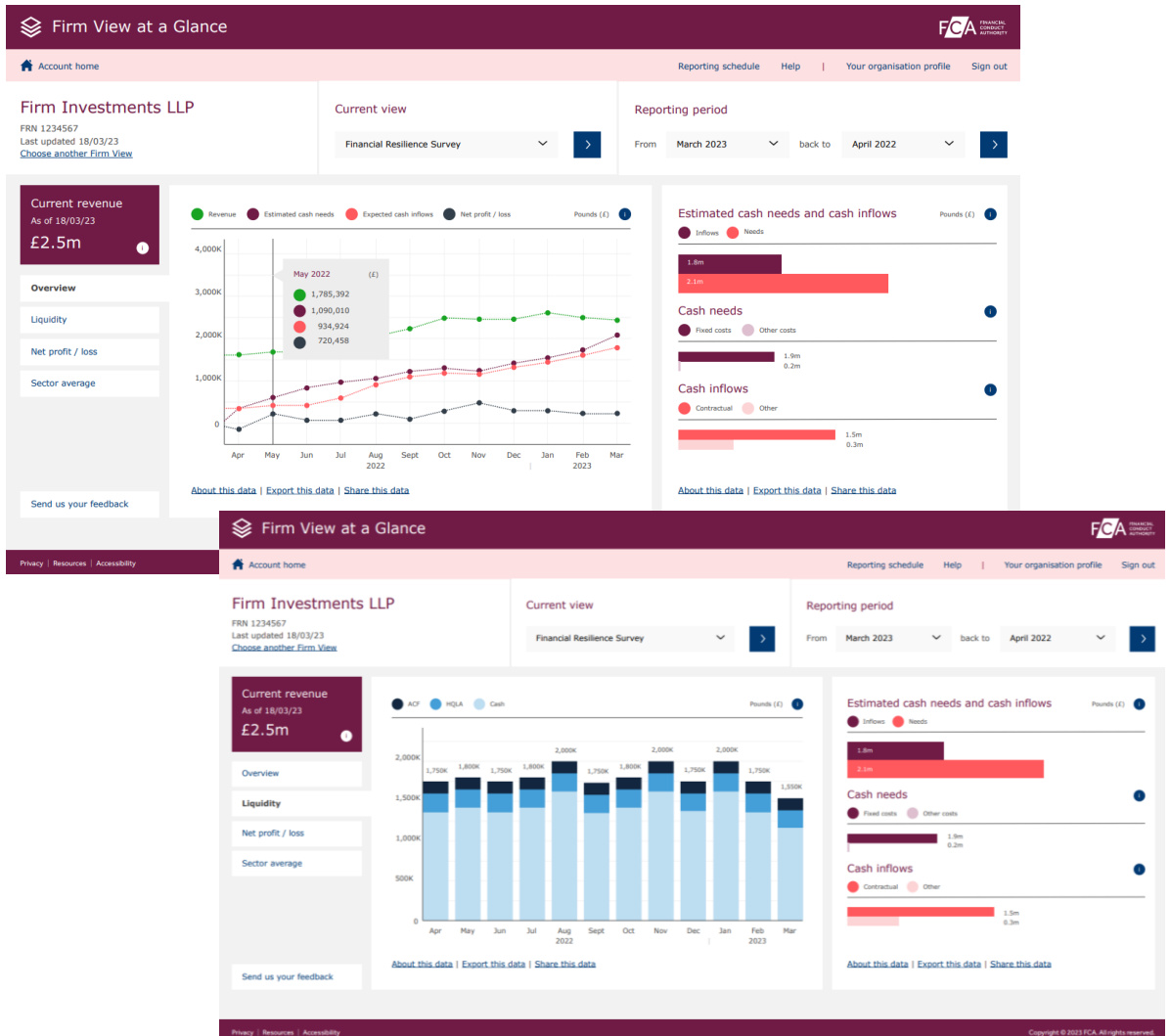
Firm View at a glance

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

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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

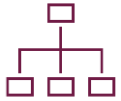
FCA users fed back to us:

- 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

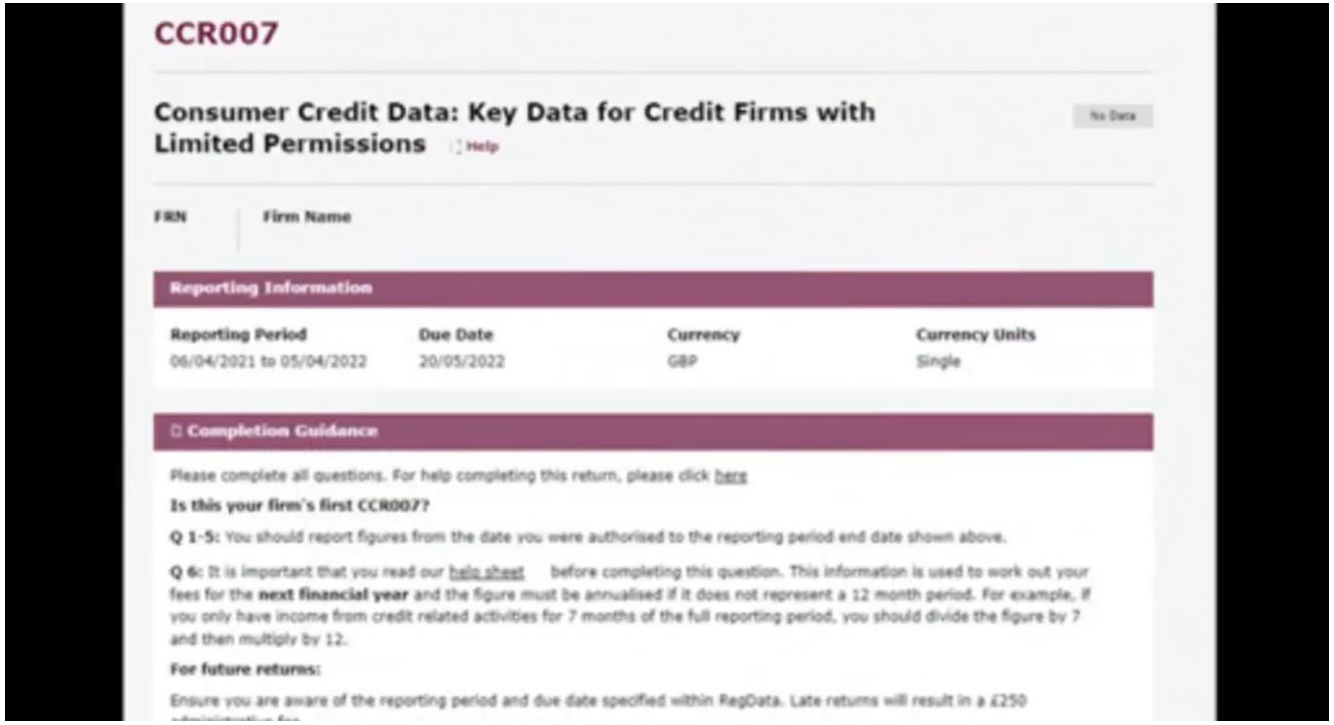
Undertook testing on the RegData Firm testing platform with firms involved in design review

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

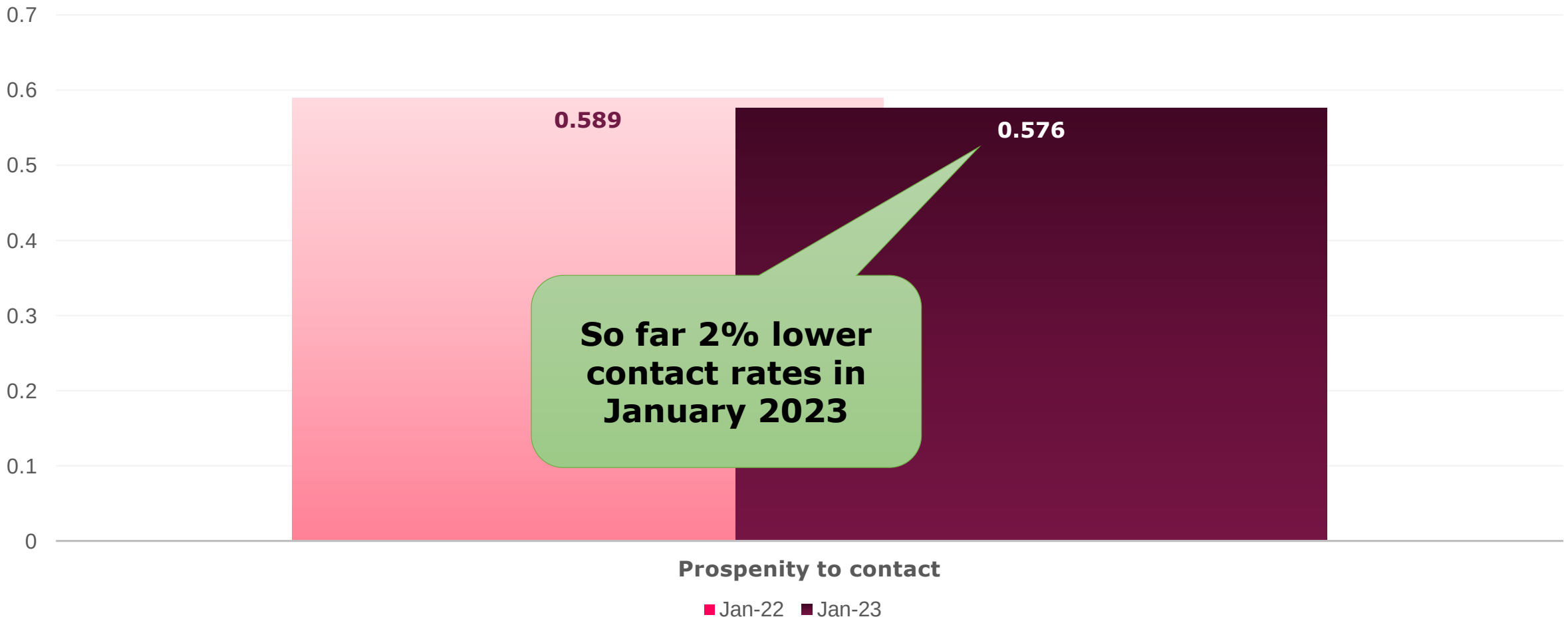
Using this process we are now looking at prudential return FSA038 to consolidate learning

What changes were made: Old design to new design

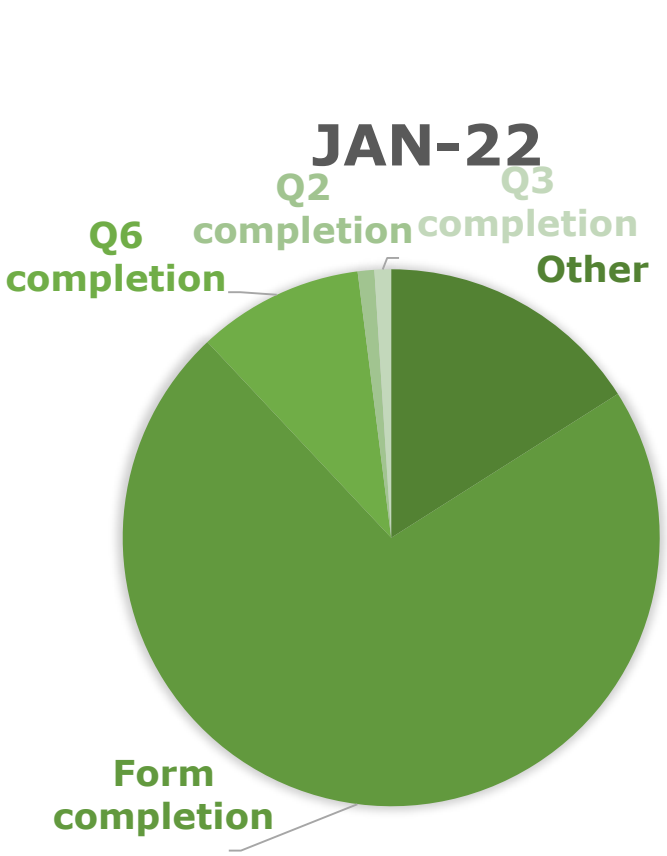
[View recording demonstration of new CCR007 form with improvements highlighted here]

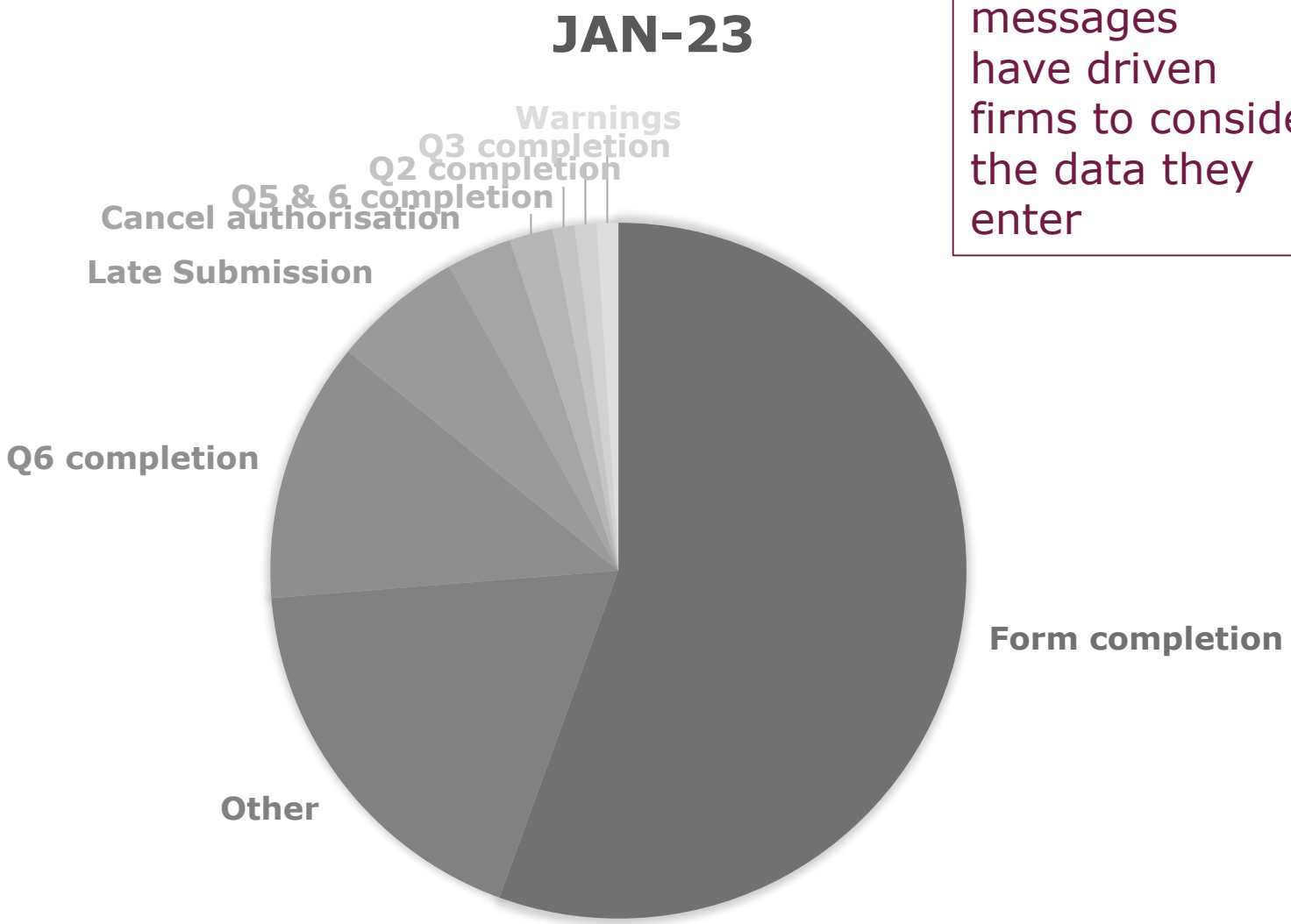


The benefit (pilot measures – Jan 2023)



The benefit (pilot measures – Jan 2023)

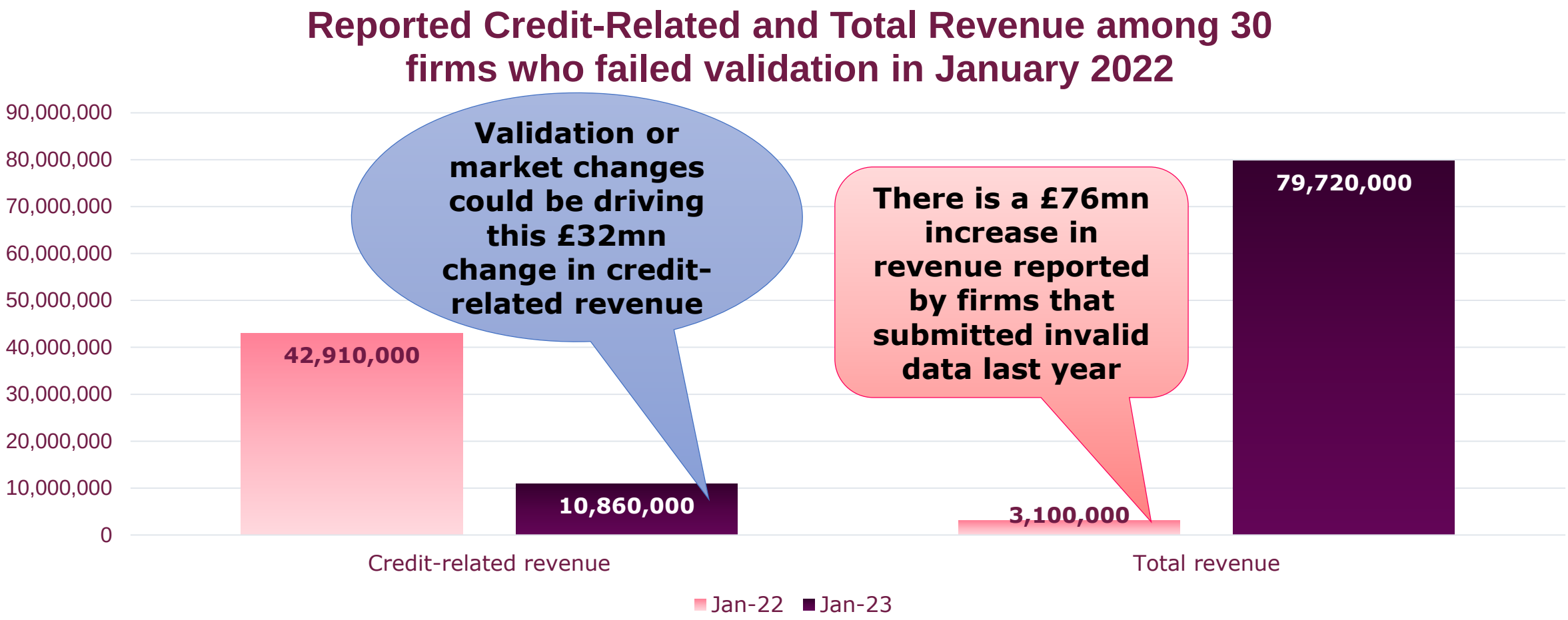




New Validation warning messages have driven firms to consider the data they enter

The benefit (pilot measures – Jan 2023)

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



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."

Bank of England

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

Where we are now

Discovery: Phase 1
COMPLETE

- **TDC Phase 1 (September 2021 to March 2022)**
- Explore business practices and processes
- Create problem statements
- Scope – some users of some BOE datasets

Discovery: Phase 2
COMPLETE

- **Oct. 7 until end-Jan**
- Revisiting due to criticality of this use case
- Explore business practices and processes
- User journey mapping Project roadmap
- Create problem statements

Alpha: Phase 2
IN PROGRESS

- **Jan. 23 until end-Jun**
- Prioritise problem statements
- Design workshops
- Product Canvas
- **Recommendations to governance committees**

Commercial Real Estate (CRE) data - Problem statements

Firm perspective

Expectations not clear

Changes not well communicated

High cost of changes

BoE submission systems not user-friendly

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

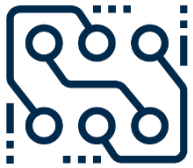
Increased emphasis on regular collections, de-emphasis of ad hoc collections

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

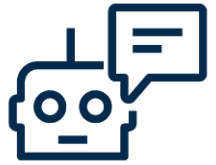


Data model

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

Bank of England

Quarterly statistical derivatives (Form DQ) return

Transforming Data Collection

Form DQ use case

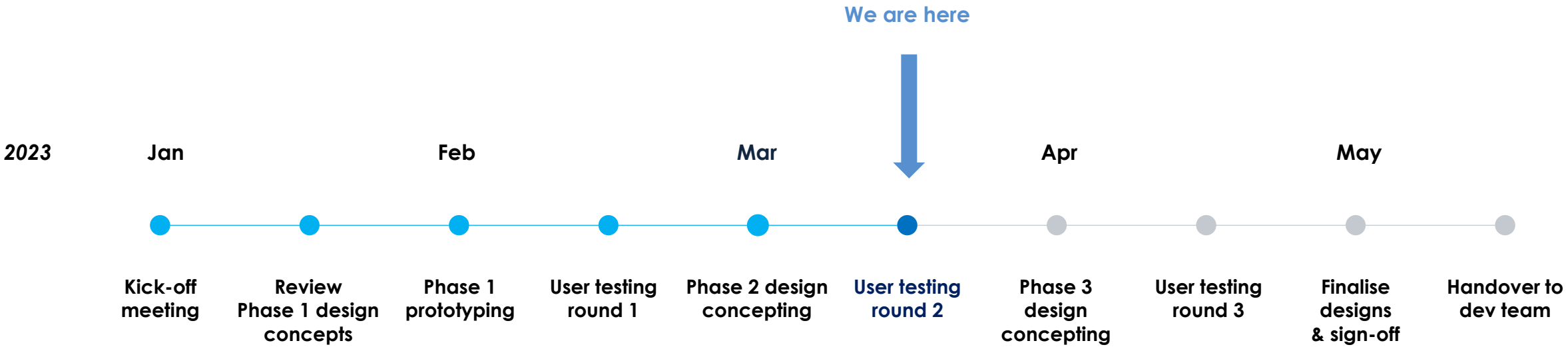
The brief

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

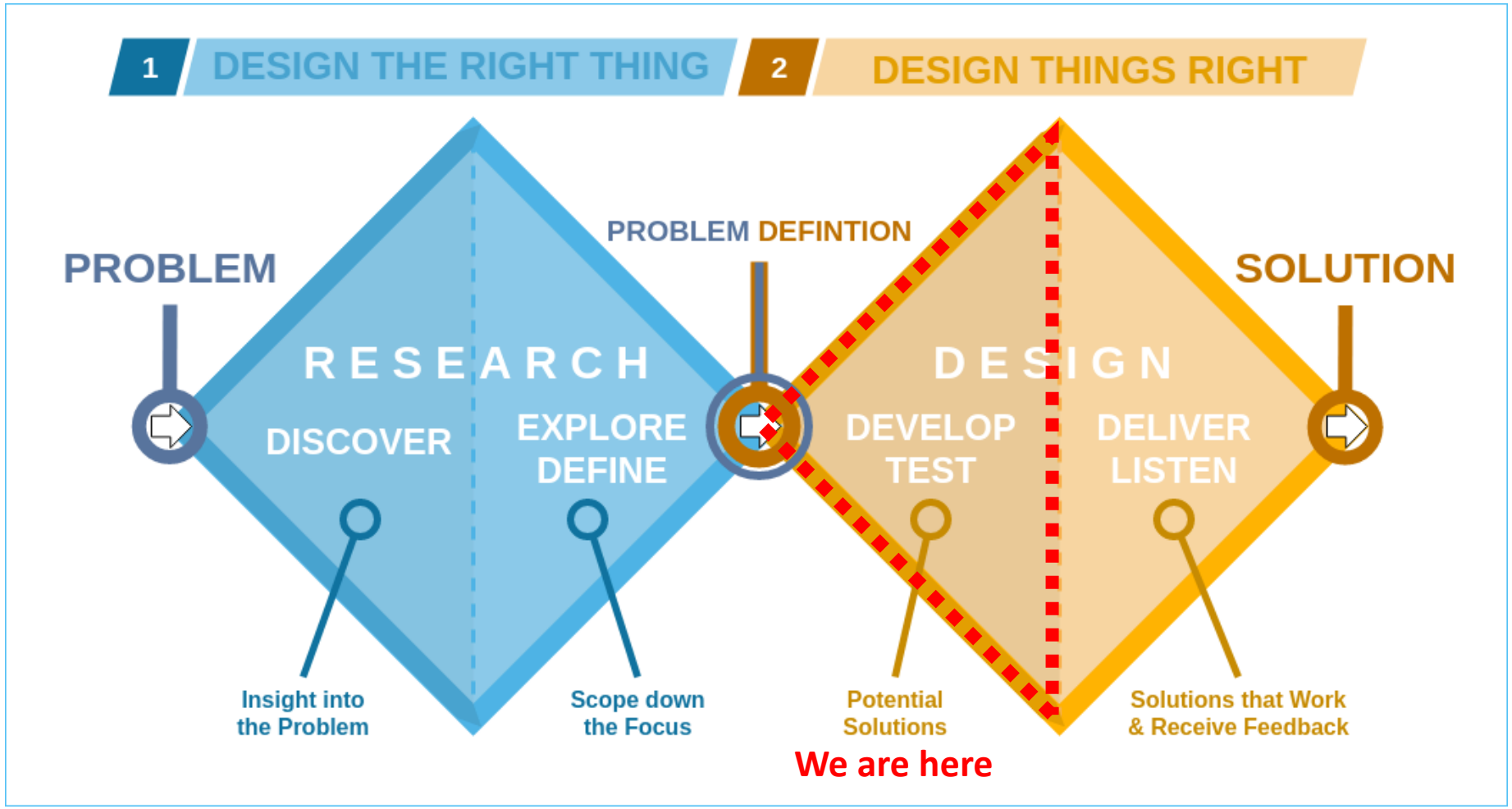
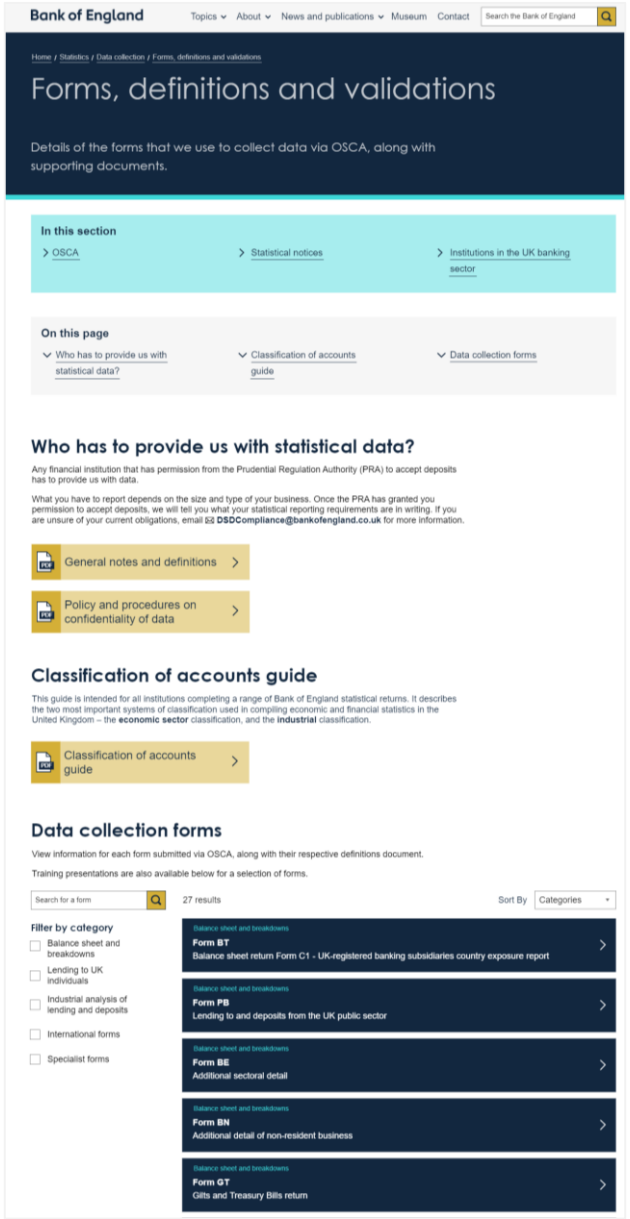


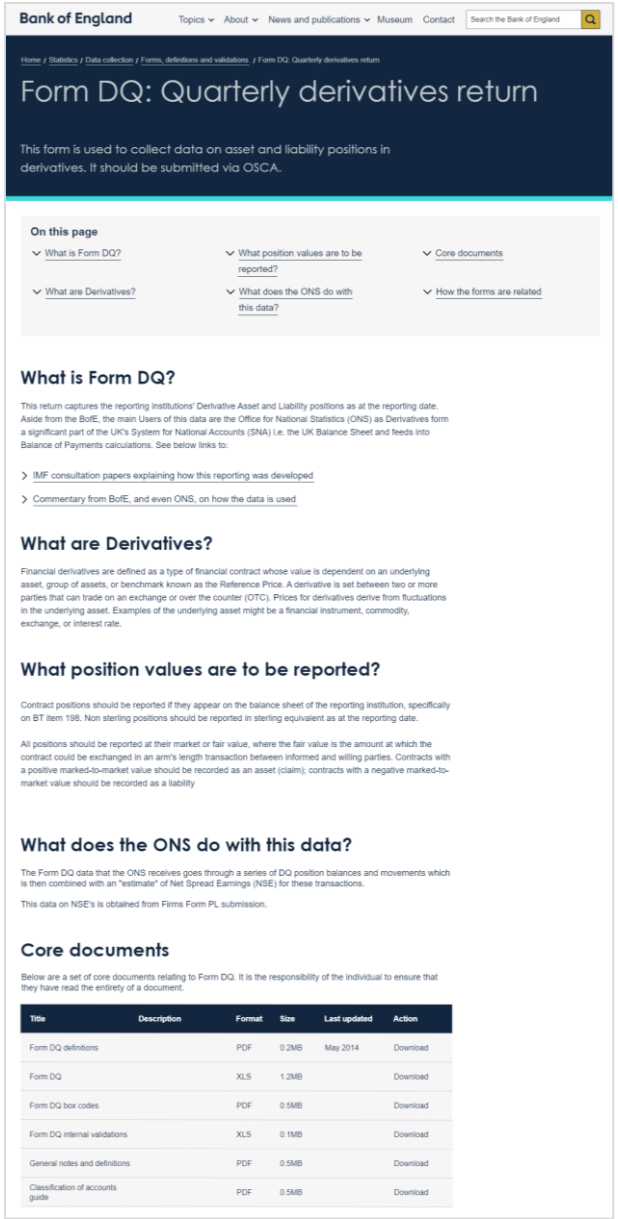
Image by Digi-ark - https://commons.wikimedia.org/w/index.php?curid=94113884

Form DQ: Review Phase 1 design concepts

PAGE 1



PAGE 2



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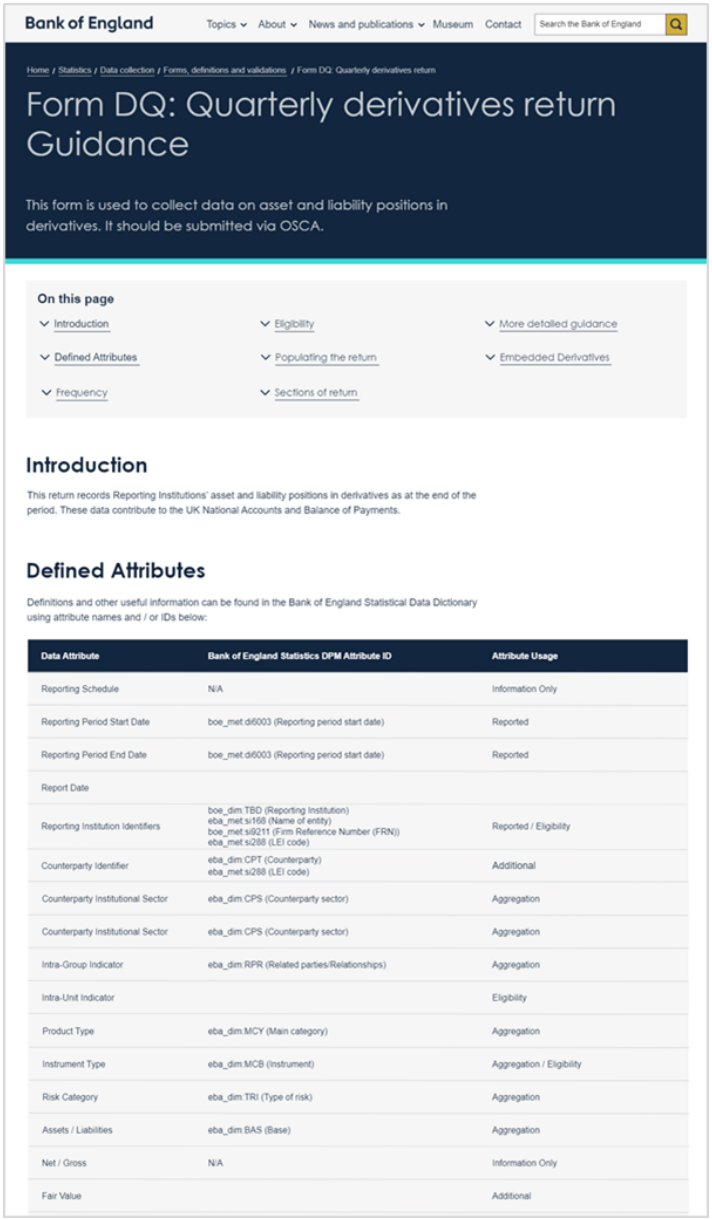


Form DQ: Research with users to date

9x

1-hour interviews

UK based participants:

Off-shore based participants:

5x

Firms

Bank A:

3rd Party A:

Bank B:

Insurance provider A:

Bank C:

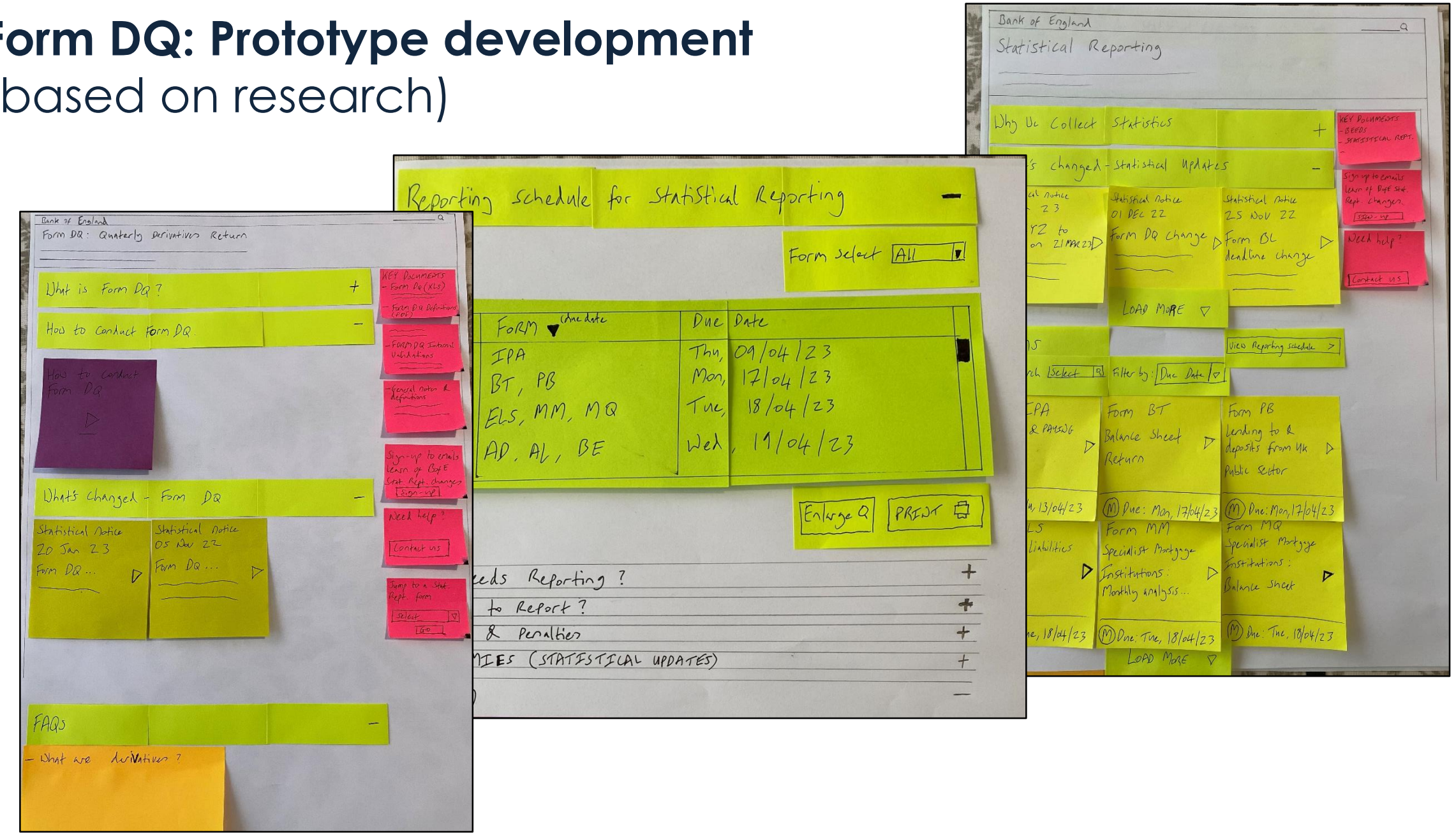
Form DQ: Findings – what are users biggest needs?

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

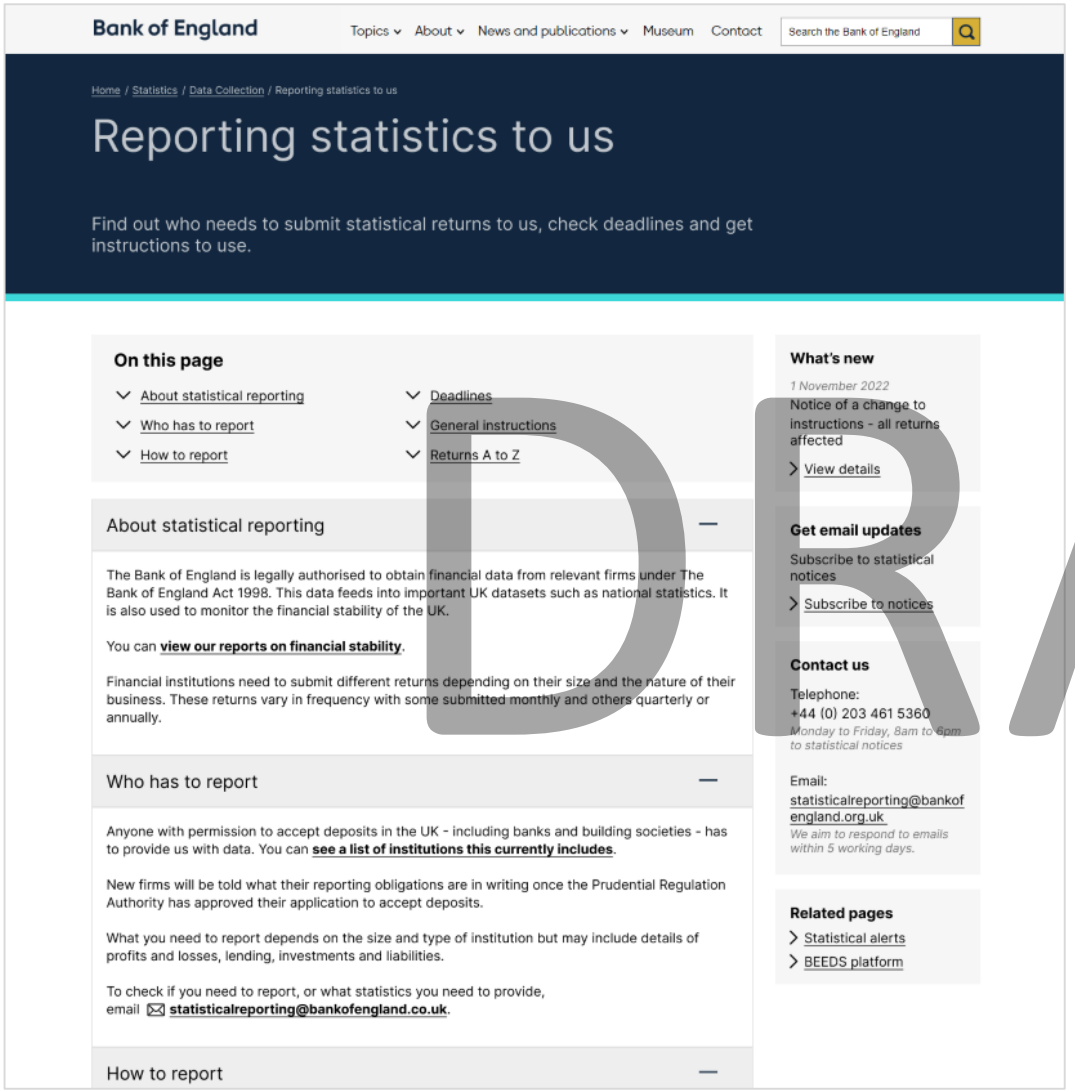
Users need: to know if reporting requirements or guidance change

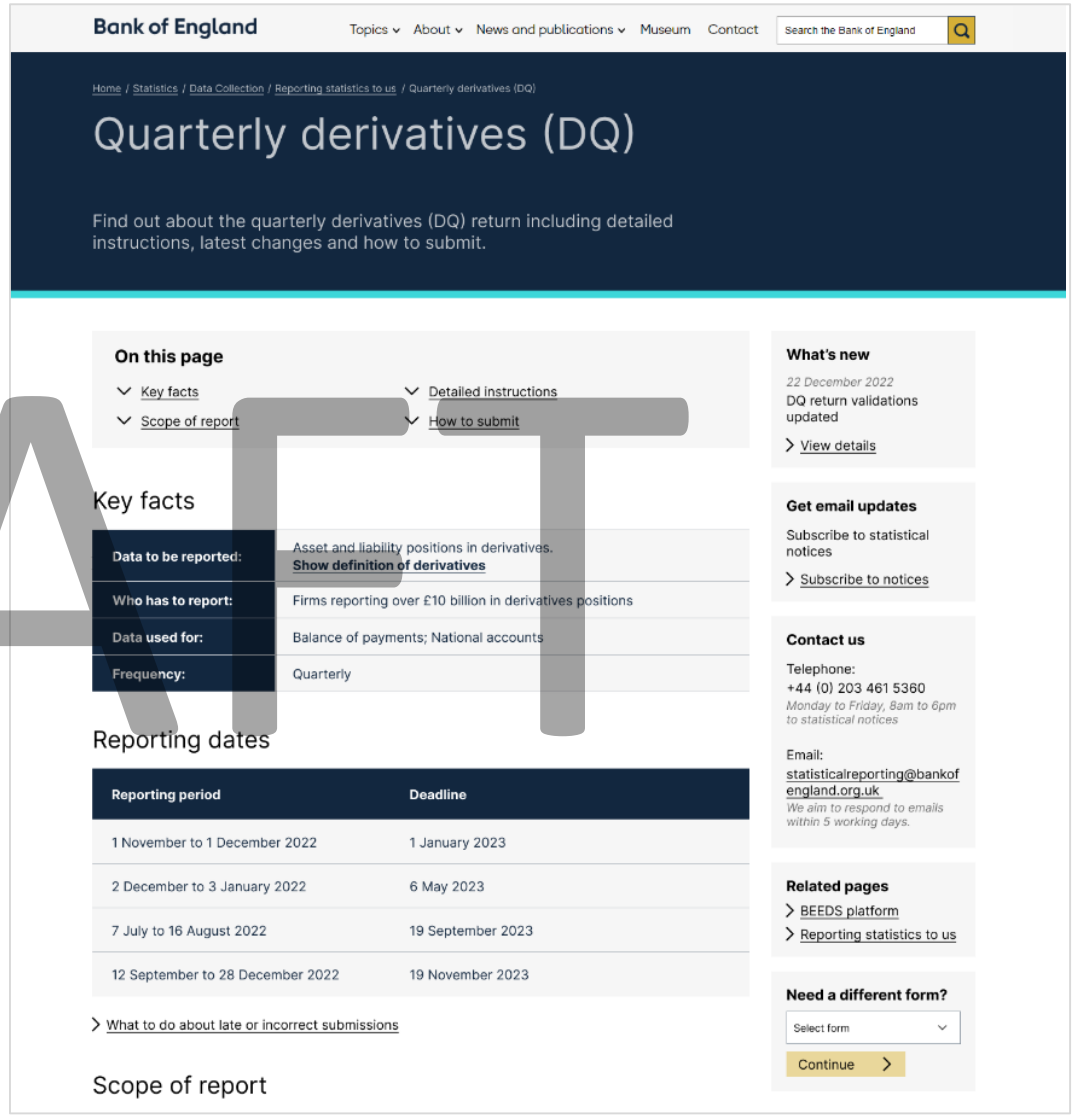
Users want: the purpose of every document to be clear

Form DQ: Prototype development
(based on research)



Form DQ: Preview of iterated designs based on user feedback





DRAFT

FINANCIAL CONDUCT AUTHORITY

Strategic Review of Prudential Data

The Discovery Team

Mike Green
User Researcher

Ben Watson
Interaction Designer

Rocco Quartu
Product Manager

Laura Cusack
Delivery Manager

Karen Watts
Content Designer

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

"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

"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

"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

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Unmet needs

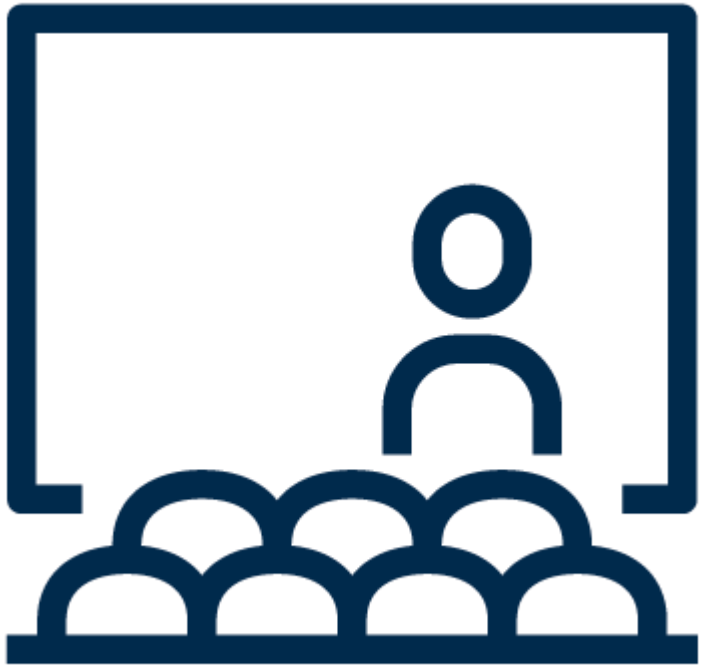
- As a firm I only provide data that is actually required and will be used by the FCA
- As an FCA user I need to receive accurate, non-redundant and up-to-date regulatory reporting from solo-regulated financial firms so that I can meet my organisation's objective of protecting consumers and mitigating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

FINANCIAL CONDUCT AUTHORITY

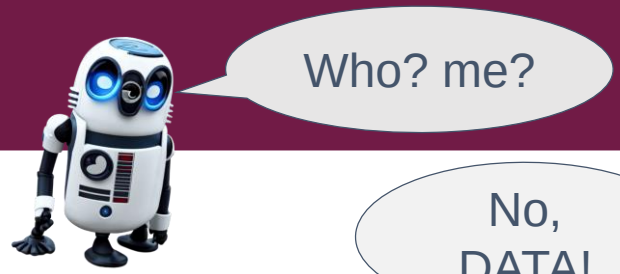
Retail Banking Business Model Data

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.

FCA FINANCIAL CONDUCT AUTHORITY



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

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

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

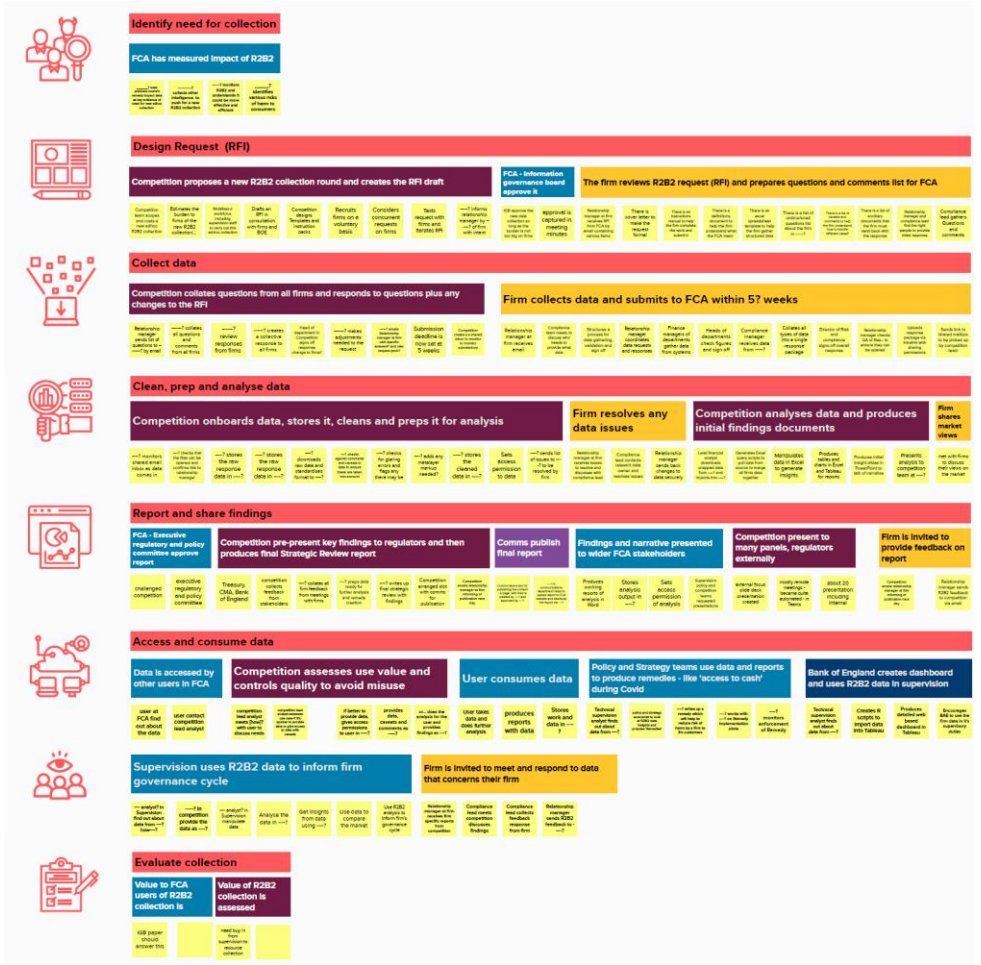
A Stage - contains steps and is carried out by one entity (i.e. firm) in a period of time

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

Bank of England

Incident, Outsourcing and Third Party Reporting (IOREP)

Transforming Data Collection

IOREP Drivers & Goals

Drivers

Lack of adequate data

Process

Lack of standardisation

Differing rules and requirements

Goals

Better data

Reduce resource and time

Improved analytics

Advance the authorities' statutory objectives

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

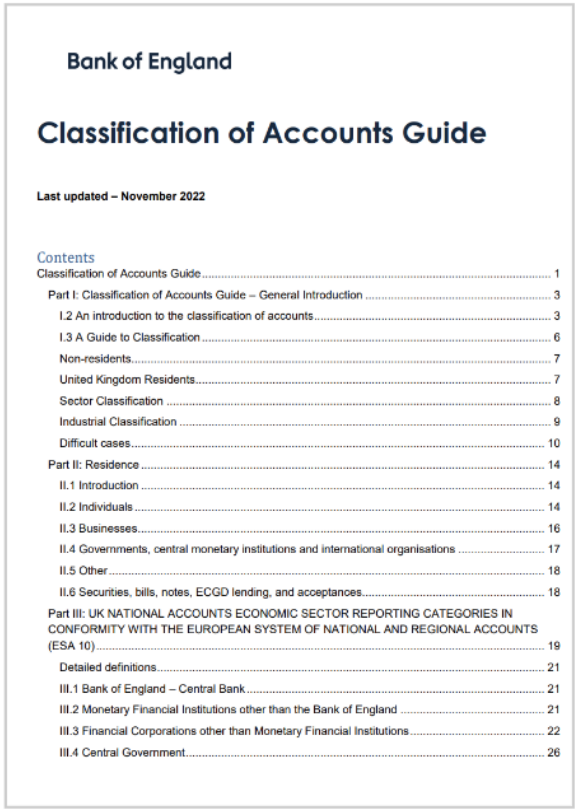
Bank of England

Get Data Service: Counterparty Classification

Transforming Data Collection

Phase 1 discovery – initial problem statements

Classification of Accounts Guide



Bank of England

Classification of Accounts Guide

Last updated – November 2022

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Classification instructions (“logic”) lack standardisation and transparency

Definitions are not precise enough and are difficult to understand

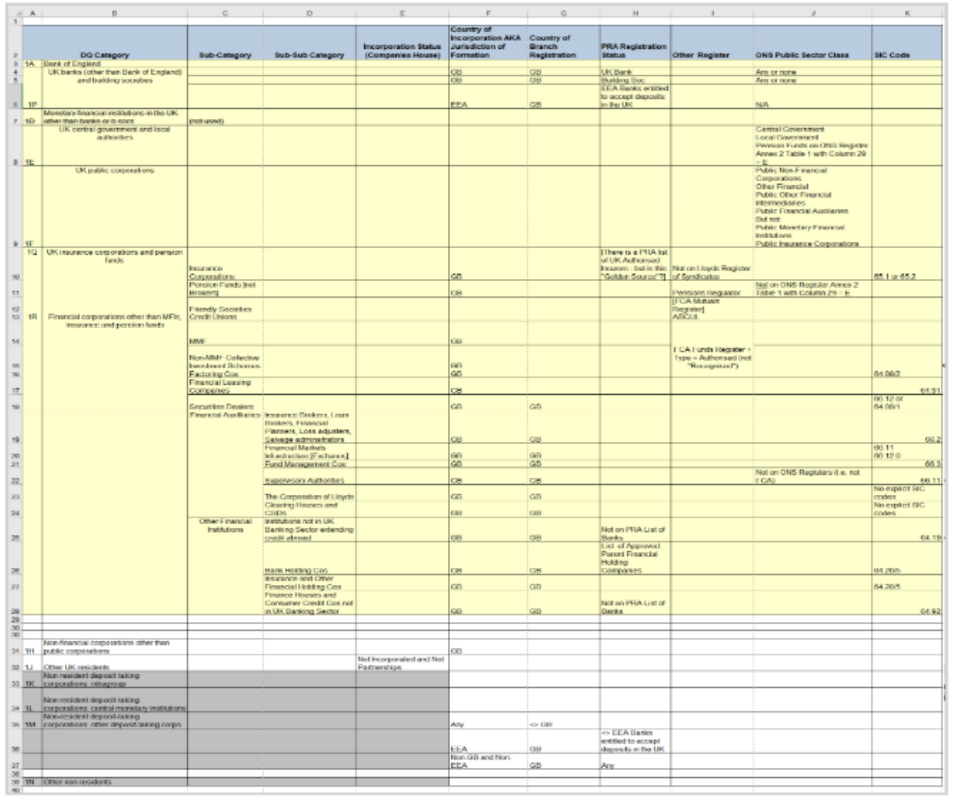
This leads to different interpretations and data inconsistencies

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

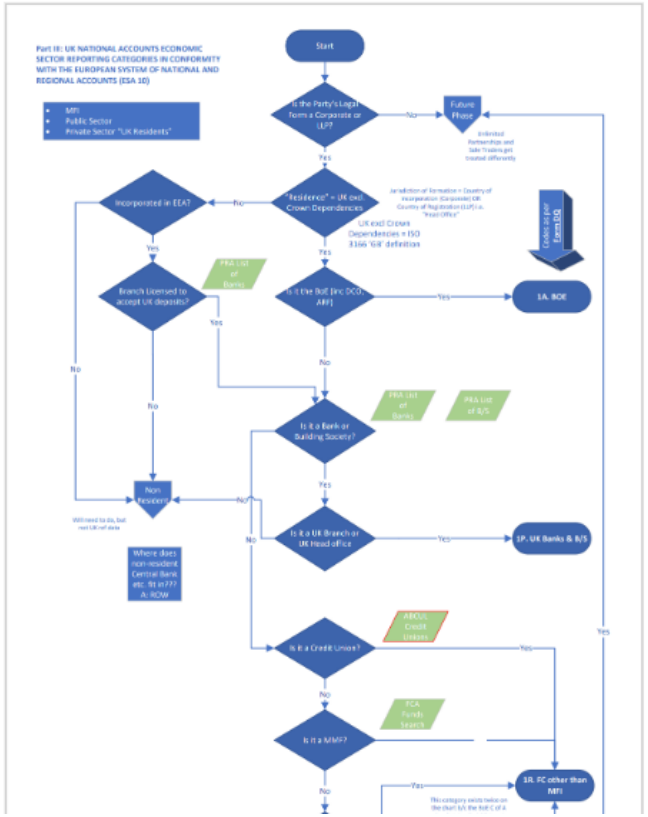
Phase 1 prototypes – tools intended to expose the logic

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

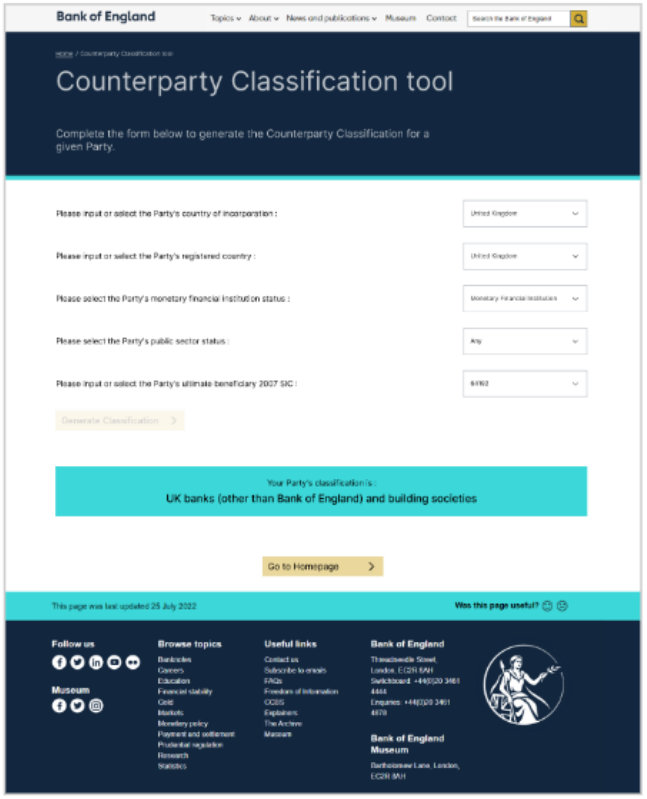
Matrix



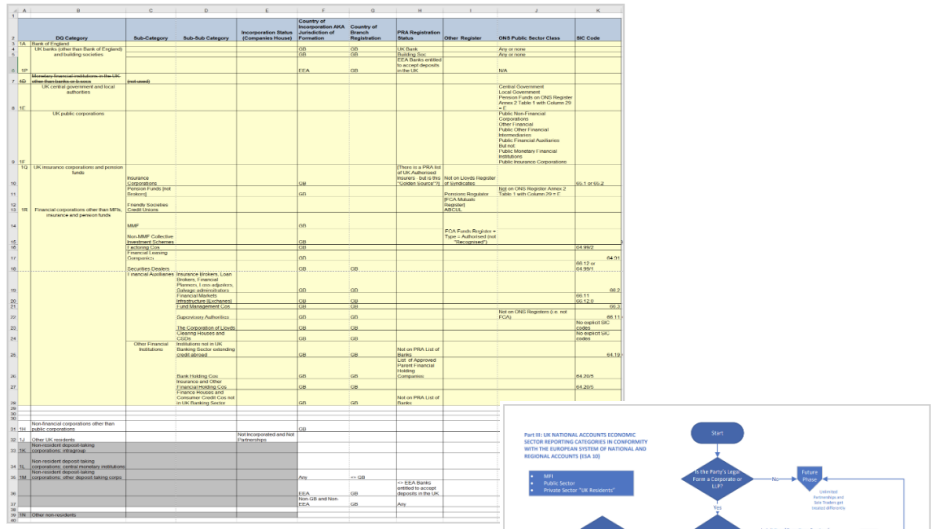
Decision Tree

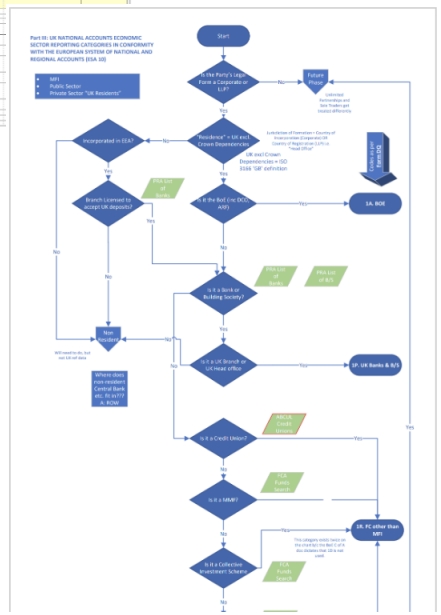


Classification Tool



Phase 1 prototypes – matrix and decision tree





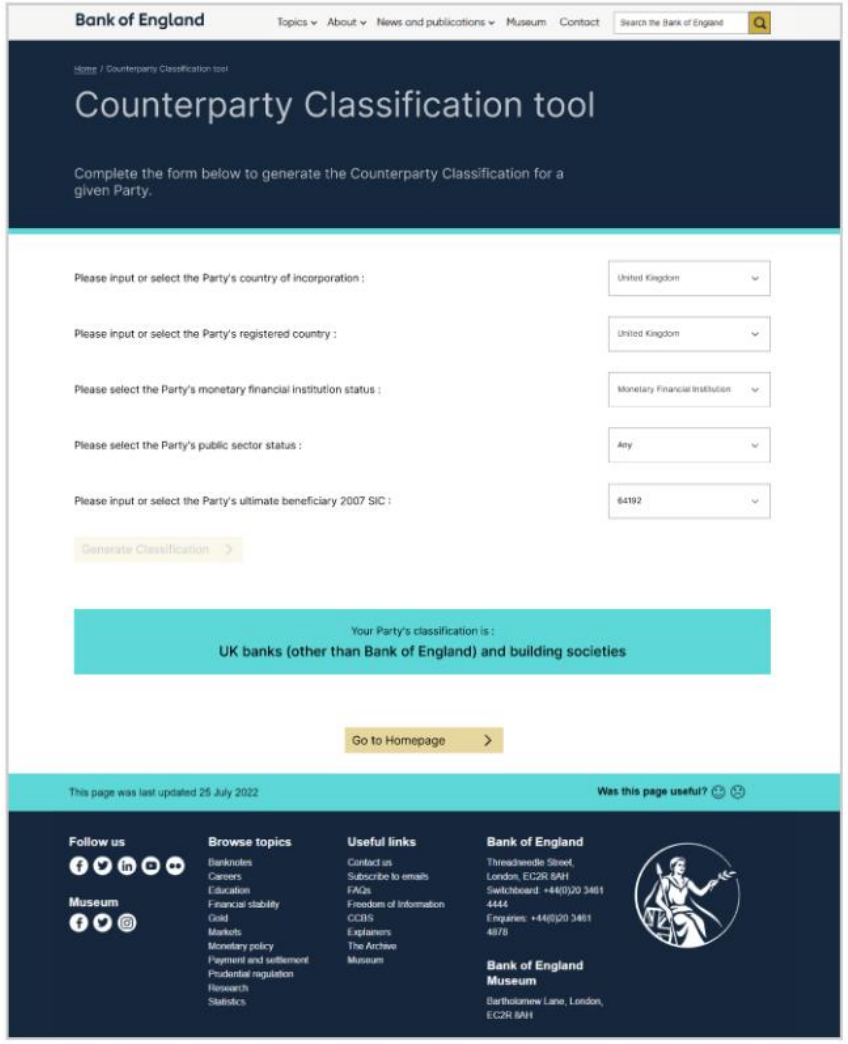
2 possible visualisations of the logic

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



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:

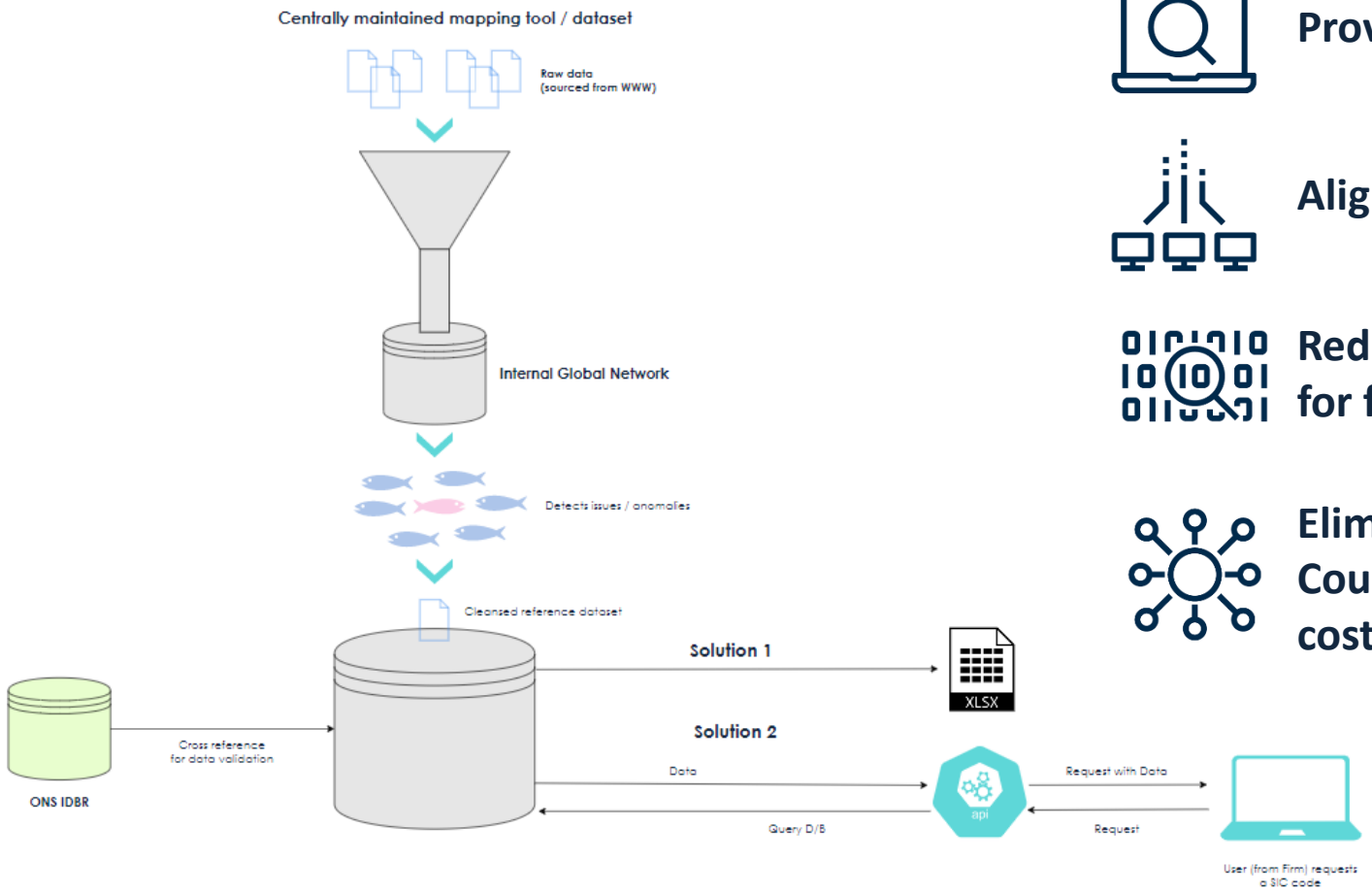
1. Instructions for Counterparty classifications are **difficult to understand**.
2. Firms built **workaround solutions** and **rely on algorithms** to generate classifications.
3. Users at operational level (within large firms) **do not read the classification instructions** published by the Bank.
4. 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 volume**s** 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

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