BANKING SUPERVISION UNDER THE SSM

INTRODUCTION TO THE FUNCTIONING OF THE ESCB (ESCB INTRO)

FACULTAD DE CIENCIAS ECONÓMICAS Y EMPRESARIALES

UNIVERSIDAD DE VALLADOLID

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DIRECTORATE GENERAL BANKING SUPERVISION
The views expressed in this presentation are those of the speaker and do not necessarily represent the position of Banco de España.
BANKING SUPERVISION UNDER THE SSM: INDEX

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1. INTRODUCTION

BANKING SUPERVISION – WHY?

- Guarantee confidence in the banking system
- Important role credit institutions play in economic development
- Highly leveraged nature of the banking business
- Public’s interest in the proper functioning of the financial system

Minimise the effects of individual crises

Protection against risk of contagion
1. INTRODUCTION

BANKING SUPERVISION - HOW?

Different models across EU

- **Separation of oversight powers by areas**: banking, securities and insurance. Spain, Italy,…

- **One supervisory agent**: jurisdiction over all financial sector. Luxembourg, Denmark,…

- **Supervision by responsibilities**: two agencies, one responsible for aspects of solvency and another responsible for the development of business and transparency ("Twin peaks"). Netherlands, Belgium, UK,…

- **Supervision in the Central Bank** (Spain, Portugal) or **Supervisory authority - Central Bank**: (Germany, Austria,…)

1. INTRODUCTION

BANKING SUPERVISION - WHAT?

Credit institutions: “an undertaking whose business is to receive deposits or other repayable funds from the public and to grant credits for its own account” (CRD IV definition)

<table>
<thead>
<tr>
<th>Total assets 2017Q4 EUR millions</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FR</td>
<td>6,945,690</td>
</tr>
<tr>
<td>DE</td>
<td>6,864,068</td>
</tr>
<tr>
<td>ES</td>
<td>3,536,447</td>
</tr>
<tr>
<td>IT</td>
<td>2,633,168</td>
</tr>
<tr>
<td>NL</td>
<td>2,462,927</td>
</tr>
<tr>
<td>BE</td>
<td>993,776</td>
</tr>
<tr>
<td>AT</td>
<td>948,861</td>
</tr>
<tr>
<td>LU</td>
<td>821,689</td>
</tr>
<tr>
<td>IE</td>
<td>428,193</td>
</tr>
<tr>
<td>FI</td>
<td>418,810</td>
</tr>
<tr>
<td>PT</td>
<td>381,242</td>
</tr>
<tr>
<td>GR</td>
<td>262,546</td>
</tr>
<tr>
<td>SK</td>
<td>77,632</td>
</tr>
<tr>
<td>CY</td>
<td>67,652</td>
</tr>
<tr>
<td>MT</td>
<td>47,775</td>
</tr>
<tr>
<td>SI</td>
<td>41,750</td>
</tr>
<tr>
<td>LV</td>
<td>28,554</td>
</tr>
<tr>
<td>LT</td>
<td>27,324</td>
</tr>
<tr>
<td>EE</td>
<td>25,325</td>
</tr>
</tbody>
</table>
2. EFFECTIVE SUPERVISION

What is “good supervision”?  

<table>
<thead>
<tr>
<th>Intrusive</th>
<th>Skeptical but proactive</th>
<th>Comprehens-ive</th>
<th>Adaptive</th>
<th>Conclusive</th>
</tr>
</thead>
</table>

### Ability to act
- Legal authority
- Adequate resources
- Clear strategy
- Robust internal organisation
- Effective working relationships with other agencies

### Will to act
- Clear and unambiguous mandate
- Operational independence
- Accountability
- Skilled staff
- Healthy relationship with industry
- Effective partnership with boards
3. INTERNATIONAL AND EUROPEAN SUPERVISORY FRAMEWORK

**INTERNATIONAL**

- **G-20** (recommendations; key lines)
- **IMF** (International Monetary Fund) (recommendations; macro scope)
- **FSB** (Financial stability Board) (recommendations, micro scope/macro elements)
- **GHoS**
- **Basel Committee (BCBS)**

**EUROPEAN UNION**

- **European Commission**
- **European Parliament** (ECOFIN)
- **ESFS** (European System of Financial Supervision)
  - **ESRB**
  - **EBA**
  - **EIOPA**
  - **ESMA**
  - **Joint Committee**
4. REGULATORY CAPITAL. BCBS

Basel Committee on Banking Supervision (BCBS)

✓ Aim: to enhance **financial stability** by improving **supervisory know-how** and the **quality of banking supervision** worldwide.

✓ Setting **minimum standards** for the regulation and supervision of banks.

✓ Decisions have **no legal force**.

Evolution of the Basel framework (1)

• Basel I (1988)
  • **Minimum capital requirements.** Focused principally on **credit risk**

• Market Risk Amendment (1996)
  • Capital requirements for **market risk**
4. REGULATORY CAPITAL. BCBS

Evolution of the Basel framework (2)

• Basel II (2004)
  • Capital allocation more risk sensitive
  • Capital requirements for operational risk
  • “Three pillars” concept: Pillar 1 - Minimum Capital Requirements
    Pillar 2 - Supervisory Review
    Pillar 3 - Market discipline

• Basel III (2010)
  Need for strengthening of the Basel II framework in view of weaknesses in the banking sector (too much leverage, inadequate liquidity buffers, poor governance and risk management).

Main innovations:
- Additional buffers to capital to increase capacity to absorb losses.
- Leverage ratio (non-risk based).
- Liquidity requirements to absorb shocks to funding.
- Additional proposals for systematically important banks
Generally two types of regulatory capital ratios:

- **Risk Based Ratios**
  \[
  \text{Risk Based Ratios} = \frac{\text{Regulatory Capital}}{\text{Risk Weighted Assets (RWA)}}
  \]

- **Leverage Based Ratios**
  \[
  \text{Leverage Based Ratios} = \frac{\text{Regulatory Capital}}{\text{Measure of Total Assets}}
  \]

RWA << Total Assets
6. SUPERVISORY FRAMEWORK IN THE EU

- 2008: Mandate of the EC
- 2009: Larosière Report
- 2011: creation of the European System of Financial Supervision (ESFS)

Objectives:
- Develop a common supervisory culture
- Facilitate a single European financial market

European System of Financial Supervision (ESFS)

Micro-prudential supervision

Macro-prudential supervision

European Banking Authority (EBA)
European Insurance and Occupational Pensions Authority (EIOPA)
European Securities and Markets Authority (ESMA)
Joint Committee
National micro-prudential supervisory authorities

European Systemic Risk Board (ESRB)
6. SUPERVISORY FRAMEWORK IN THE EU

- **EBA**: European micro-prudential supervision for credit institutions, financial conglomerates, investment firms and payment institutions.
  
  Tasks: sound, effective and consistent regulation and supervision; stability and effectiveness of the financial system; preventing regulatory arbitrage; equal level of supervision; consumer protection; international supervisory coordination. Drafts and implements technical standards, issues guidelines and recommendations.

- **EIOPA**: European micro-prudential supervision for insurance undertakings.

- **ESMA**: European micro-prudential supervision for securities markets and their participating institutions.

- **Joint Committee** of the ESAs: overall and cross-sectoral supervisory consistency.

- **ESRB**: macro-prudential oversight of the financial system as a whole. Prevention and mitigation of systemic risks to financial stability in the EU through issuing warnings and recommendations for action.
7. EU BANKING UNION

Why the Banking Union?

- Financial crisis 2008
- Links public & banking sectors
- Sovereign debt crisis

Problems can easily spill over national borders → Financial distress in other EU countries
The purpose of the Banking Union is to make European banking:

<table>
<thead>
<tr>
<th>more transparent</th>
<th>by consistently applying <strong>common rules and administrative standards</strong> for supervision, recovery and resolution of banks</th>
</tr>
</thead>
<tbody>
<tr>
<td>unified</td>
<td>by treating national and cross-border banking activities <strong>equally</strong> and by <strong>delinking</strong> the financial health of banks from the countries in which they are located</td>
</tr>
<tr>
<td>safer</td>
<td>by <strong>intervening early</strong> if banks face problems in order to help <strong>prevent</strong> them from failing, and – if necessary – by <strong>resolving</strong> banks efficiently</td>
</tr>
</tbody>
</table>
The EU Banking Union is based on the three following pillars:

- **Single Supervisory Mechanism (4.11.2014):** system of financial supervision composed by the ECB and the NCAs of the participating member states.

- **Single Resolution Mechanism (31.12.2015):** designed to ensure that the resolution of a failing bank can be managed efficiently with minimal cost to taxpayers and the real economy.

- **European Insurance Deposit Scheme (under discussion):** new banking union-wide deposit insurance scheme
7. EU BANKING UNION

Banking Regulatory Reforms

**BCBS - Basel III framework**
- Revised capital requirements + Leverage ratio.
- New liquidity requirements

**FSB – Too Big To Fail**
- Capital surcharges for G-SIBs.
- Total Loss Absorbance Capacity (TLAC)

**EU – Bank Recovery and Resolution**
- Bank Recovery and Resolution Directive (BRRD)
- Single Resolution Mechanism (SRM)

**More capital and of better quality**
- Target excessive leverage

**Force banks to take into account their systemic role**
- Preference for early intervention.
- Orderly resolution only if necessary.
- Bail-in rules (private investors to bear costs of banks’ failure)
8. SSM - INTRODUCTION

Key steps to the launch of the SSM:

• **29 June 2012:** Euro area Heads of State or Government decide to assign supervisory tasks to the ECB within a Single Supervisory Mechanism.

• **12 September 2012:** European Commission presents draft regulation which assign specific supervisory tasks to the ECB (SSM Regulation). Roadmap towards banking union.

• **23 October 2013:** ECB starts Comprehensive Assessment.

• **3 November 2013:** SSM Regulation enters into force. Provides that the ECB assumes its full supervisory tasks on 4 November 2014.

• **15 May 2014:** SSM Framework Regulation comes into force. Legal structure for the ECB’s cooperation with NCAs.

• **26 October 2014:** ECB publishes results of Comprehensive Assessment.

• **4 November 2014:** SSM becomes operational.
The SSM is an integrated system of supervision based on cooperation between the ECB and National Supervisors (NCAs)

Distribution of tasks within the SSM

Key SSM facts

1. The Single Supervisory Mechanism (SSM) is one of the world’s largest banking supervisors.
2. At Q1 2018 with 109 banking groups in 19 countries under direct ECB supervision – including 7 out of 30 G-SIBs. More than 80% of Euro Area Banking Assets under direct ECB supervision.
3. Circa 4,000 smaller institutions are directly supervised by the national competent authorities (NCAs), with the ECB being responsible for the system at large.
4. Banking assets under SSM supervision amount to more than 27 trillion euro (Q1 2018).
5. Key distinction: significant & less significant.
...focussed on prudential supervision

Responsibility of the ECB for institutions within the euro area
- Credit institutions and (mixed) financial holding companies
- Micro-prudential supervision
  - Licensing, qualifying holdings, fit and proper, governance
  - Own funds, liquidity, risk management, reporting
- Early prudential intervention
- Macro-prudential supervision

Based on an exclusive competence of the ECB with regard to significant institutions

No responsibility of the ECB
- Insurance undertakings, investment firms, payment services providers
- Resolution of credit institutions
- Consumer protection, money-laundering or terrorism financing

1 The ECB is competent for the smooth operation of payment systems (oversight function)
8. SSM - INTRODUCTION

SSM

Responsible for the **prudential supervision** of all credit institutions in the participating Member States.

![Diagram with ECB and NCAs arrows pointing to SSM]

**Three main objectives**

- Ensure **the safety and soundness** of the European banking system
- Increase **financial integration and stability**
- Ensure **consistent supervision**
### Territorial scope of SSM

<table>
<thead>
<tr>
<th>Member State</th>
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<tbody>
<tr>
<td>Belgium (BE)</td>
</tr>
<tr>
<td>Germany (DE)</td>
</tr>
<tr>
<td>Estonia (EE)</td>
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<tr>
<td>Ireland (IE)</td>
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<tr>
<td>Greece (GR)</td>
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<tr>
<td>Spain (ES)</td>
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<tr>
<td>France (FR)</td>
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<tr>
<td>Italy (IT)</td>
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<tr>
<td>Cyprus (CY)</td>
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<tr>
<td>Latvia (LV)</td>
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<tr>
<td>Lithuania (LT)</td>
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<td>Luxembourg (LU)</td>
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<td>Malta (MT)</td>
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<tr>
<td>Netherlands (NL)</td>
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<tr>
<td>Austria (AT)</td>
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<tr>
<td>Portugal (PT)</td>
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<tr>
<td>Slovenia (SI)</td>
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<tr>
<td>Slovakia (SK)</td>
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<tr>
<td>Finland (FI)</td>
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</tbody>
</table>
### ECB’s supervisory powers

#### Micro-prudential tools

- Grant or withdraw **bank licences**
- Authorise **acquisitions** of qualified holdings
- Monitor **compliance** with all **prudential requirements** laid down in EU banking rules
- Conduct **investigations and on-site inspections**
- Set **prudential requirements** (own funds, large exposure limits, liquidity, leverage and disclosure, internal governance and controls, “fit and proper tests”)
- Carry out **supervisory reviews**
- Impose **corrective measures and sanctions**

#### Macro-prudential tools

- Define **higher requirements for capital buffers** than applied by national supervisory authorities and set a buffer rate if the national supervisor has not done so
8. SSM - SUPERVISED ENTITIES

KEY DISTINCTION

All significant and less significant banks in the participating countries through direct and indirect supervision.

<table>
<thead>
<tr>
<th>Significance criteria for Significant institutions (Sis)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Size</strong></td>
</tr>
<tr>
<td>Total assets &gt; € 30 billion</td>
</tr>
<tr>
<td><strong>Economic importance</strong></td>
</tr>
<tr>
<td>for the specific country or the EU economy as a whole</td>
</tr>
<tr>
<td><strong>Cross-border activities</strong></td>
</tr>
<tr>
<td>Total assets &gt; € 5 billion + ratio of its cross-border assets/liabilities in more than one other participating Member State to its total assets/liabilities is above 20%</td>
</tr>
<tr>
<td><strong>Direct public financial assistance</strong></td>
</tr>
<tr>
<td>It has requested or received funding from the European Stability Mechanism or the European Financial Stability Facility</td>
</tr>
</tbody>
</table>

A supervised bank can also be considered significant if it is one of the three most significant banks established in a particular country.
LESS SIGNIFICANT INSTITUTIONS (LSIs)

• National supervisors are responsible for the ongoing supervision of LSIs

• LSIs assets represented around 15% of SSM banking assets (2017)

• Germany, Austria and Italy have approximately 85% of all LSIs

• Many LSIs are traditional retail banks, but a number have specialised business model also
8. SSM - SUPERVISED ENTITIES

SIs Updated overview

Supervisory Banking Statistics - First quarter 2018

Total assets by location of ultimate parent (%)

- **Groups with ultimate parent in SSM: 97.85%** - refers to SIs supervised by the ECB at the highest level of consolidations
- **Groups with ultimate parent in EEA (outside SSM): 1,09%** - refers SIs supervised by ECB, whose highest level of consolidation is outside the SSM and in the EEA
- **Groups with ultimate parent outside EEA: 1.06%** - refers to SIs supervised by ECB, whose highest level of consolidation is outside the EEA

Significant institution by classification (size) – Banks with total assets (number)

- Less than €30 billion: 27
- Between € 30 billion and € 100 billion: 45
- Between € 100 billion and € 200 billion: 14
- Between € 200 billion and € 300 billion: 7
- More than € 300 billion: 8
- G- SIBs 7
8. SSM - SUPERVISED ENTITIES

SIs Updated overview

CONCENTRATION OF TOTAL ASSETS

Significant institutions at the highest level of consolidation for which common reporting (COREP) and financial reporting (FINREP) are available. The charts show the cumulative percentage of the total assets in the sample which is covered when the total assets of each institution, ordered from the largest to the smallest, are added.
8. SSM ORGANISATION & GOVERNANCE

- Governing Council
  - Supervisory Board
    - Chair & Vice-Chair
    - 4 ECB representatives
    - National Supervisors representatives
  - Steering committee
  - Supervised Institutions
    - JSTs & Inspection Teams
      - Information from JSTs & inspections
      - Working rules
    - Mediation panel
    - Supervisory fees
      - Draft decisions adopted unless objections

Monetary Policy + other central bank tasks.
ESRB secretary
Support functions for single supervision
Administrative Board of Review
Draft decisions adopted unless objections
8. SSM ORGANISATION & GOVERNANCE

**Governing Council**
- 6 members of Executive Board
- Governors of the national central banks of the 19 euro area countries

**Responsibilities:**
The Governing Council is the sole ECB decision making body for the prudential supervision of credit institutions established in Member States participating in the SSM.

**Supervisory Board**
- Chair
- Vice-Chair
- 4 ECB Reps
- Reps of the 19 NCAs (NCBs)

**Responsibilities:**
- Internal body that plans and executes the supervisory tasks conferred on the ECB
- Carries out the preparatory work regarding the ECB’s supervisory tasks, in the interest of the Union as a whole
- Proposes complete draft decisions for adoption by the Governing Council

**Steering Committee**
- Chair
- Vice-Chair
- 1 ECB Rep
- 5 Members representing NCAs (1 year rotation)

**Responsibilities:**
- Supports the activities of the Supervisory Board
- Executes preparatory tasks in the interest of the Union
- Has no decision-making powers
DG-MS 1 & 2: conduct of day-to-day supervision of significant institutions by the JSTs
DG-MS 3: oversight of the supervision of less significant institutions, performed by NCAs
DG-MS 4: ensure consistency, early identification of risks and promote best practices, via expert networks within the ECB and NCAs
SSB: support supervisory decision-making (including SB meetings/WP and review of documentation) and assistance to the ABoR, the MP and the discharge of accountability
8. SSM: FUNCTIONING

Structure of the SSM: Distribution of tasks

- ECB
  - Direct supervision
    - Oversees the system
  - Indirect supervision

- Joint Supervisory Teams

- National supervisors
  - Horizontal divisions
    - Support
  - Less significant institutions

- Significant institutions
A bank supervisor needs to know to which risks the supervised banks are exposed.

It is the foundation of doing supervision – as it enables the SSM to investigate the correct topics in banks.

One cannot assess every risk in every bank (resource constraints).

Therefore, the SSM focuses on the most important risks for the next 1-3 years, the so-called “Supervisory Priorities”.

Every JST receives a yearly to do list for every bank.

Thus guaranteeing that each bank receives at least a minimum level of supervision.

This is important, as the SSM must ensure supervision of all banks in the same way.
8. SSM – FUNCTIONING: SUPERVISORY PRIORITIES

2017

- Thematic review of Business Models
- Sustainability of the business model
- Quality of credit portfolios
- Assessment of impaired assets
- Thematic review of adaptation to IFRS 9

2018

- Implications of the interest rate for the income statement
- Review of strategies to reduce non-performing assets
- Checking the adequacy of provisioning and write-downs
- Monitoring of IFRS 9 implementation progress
- Review of internal models
- Adaptation to new regulations
- Risks of Outsourcing
- Improvement of the ICAAP
- EBA Stress Test for SIs
Supervisory Review and Examination Process (SREP)

Legal basis Art. 97 CRD

- **Main instrument** of banking supervision
- High and **harmonised standards** of supervision
- **Level playing field:**
  - Common methodology & decision-making process
- **Sound risk assessment** of each institution
  - Quantitative and qualitative elements (Risk level & Risk control)
  - Holistic assessment
- **Three perspectives:**
  - **Supervisory** (RAS) – Risk Assessment System
  - **Bank’s** (ICAAP/ILAAP)
  - **Forward looking** (Stress tests)
8. SSM SREP - OVERVIEW

Building block approach in line with EBA Guidelines

SREP methodology at a glance: four key elements

SREP Decision

Quantitative capital measures
Quantitative liquidity measures
Other supervisory measures

Overall SREP assessment – holistic approach

→ Score + rationale/main conclusions

1. Business model assessment
2. Governance and risk management assessment
3. Assessment of risks to capital
4. Assessment of risks to liquidity and funding

Source: ECB_ SREP Methodology booklet_2017
8. SSM - SREP OVERVIEW

Three phases in on-going risk assessment for each of four elements

Phase 1: Data gathering
- Main sources: quarterly ITS, STE reports

Phase 2: Automated anchoring score
- Scoring risk level
- Formal compliance checking of risk control

Phase 3: Supervisory judgement
- Adjustments based on additional factors and considering banks’ specificities and complexity

Risk level (RL) vs. risk control (RC)

1. Business model: RL
2. Internal governance and RM: n/a
3. Assessment of capital risks: RL, RC
4. Assessment of liquidity risks: RL, RC

Combined score (RL + RC)

n/a: not applicable

The intensity of the supervisory engagement is decided based on banks’ risk profile and size

Source: ECB_ SREP Methodology booklet_2017
8. SSM - SREP OVERVIEW

- Fair flexibility on a four-grade scale where Phase 2 score can be improved by one notch and worsened by two notches based on supervisory judgement.

- Ensures the right balance between:
  - a common process, ensuring consistency across SSM banks and defining an anchor point
  - the necessary supervisory judgment, to take into account the specificities and complexity of an institution

- Adjustments go in both directions and are fully documented by the JST in the integrated IT system

- Departing from constrained judgement not allowed as a rule

- Constrained judgment used effectively by JSTs for all risk categories in both directions – improving as well as worsening Phase 2 scores.

Source: ECB_ SREP Methodology booklet_2017
8. SSM SREP: OUTCOME

Outcomes:

1. Holistic, forward-looking assessment of the overall viability of the institution:
   Overall SREP score: 1 2 3 4
   Constraint judgement: +2 / -1

2. SREP decision:
   a) additional own funds requirements.
   b) quantitative liquidity requirements.
   c) other supervisory measures (e.g. restriction or limitation of business, requirement to reduce risks, additional or more frequent reporting obligations).

3. Input to the determination of the minimum level of supervisory engagement for a specific institution as part of the Supervisory Examination Programme (SEP).
What’s next?

Great progress has been made…but...

…there is still a lot do:

- Further harmonisation and coordination ECB-NCAs
- Decision-making process more efficient
- Improve supervisory tools to identify and assess the risks.
### Credit Institutions

<table>
<thead>
<tr>
<th>Groups of Significant institutions</th>
<th>Groups</th>
<th>% Assets</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>94.3%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Subgroups of Spanish institutions dependent on groups of foreign SIs</th>
<th>Groups</th>
<th>% Assets</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>1.0%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Less significant institutions</th>
<th>Groups</th>
<th>% Assets</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>4.7%</td>
<td></td>
</tr>
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</table>

SOURCE: Banco de España
### Directorate General Banking Supervision staff

<table>
<thead>
<tr>
<th>Position</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directors and other managers</td>
<td>42</td>
</tr>
<tr>
<td>Bank examiners / Inspection auditors</td>
<td>281</td>
</tr>
<tr>
<td>Senior analysts / Lawyers / Experts</td>
<td>19</td>
</tr>
<tr>
<td>IT auditors</td>
<td>45</td>
</tr>
<tr>
<td>Junior analysts</td>
<td>42</td>
</tr>
<tr>
<td>Administrative staff</td>
<td>48</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>477</strong></td>
</tr>
</tbody>
</table>
The staff of the Directorate General Banking Supervision have the following functions:

- 165 persons have functions relating to ongoing supervision of SIs conducted through JSTs set up by the SSM
- 21 persons have functions relating to ongoing supervision of LSIs supervised directly by the Banco de España and indirectly by the SSM
- 21 persons have functions relating to institutions whose supervision has not been taken on by the SSM
- 111 persons have functions relating to on-site inspections or review of internal models
- 102 persons have cross-departmental functions
- 65 persons have other functions.
8. BANCO DE ESPAÑA

BdE Supervisory functions (cont.)

- Direct supervision of Less Significant Institutions
- Cooperation in Common procedures (SSM): authorisations, acquisitions of qualifying holdings and withdrawal of authorisations
- Participation in the networks organised by the SSM for horizontal functions.

2) Supervision of areas not transferred to the SSM

- Other institutions: specialised lending institutions, payment institutions, electronic money institutions, currency-exchange bureaux, mutual guarantee and re-guarantee companies, appraisal companies, banking foundations, SAREB.
- Market conduct and consumer protection.
- Prevention of Money Laundering and terrorism financing.
- Investigation of unauthorised activities.
Thank you for your attention!