



BANK OF ENGLAND
PRUDENTIAL REGULATION
AUTHORITY

Consultation Paper | CP28/16

Ensuring operational continuity in resolution: reporting requirements

July 2016

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Responses are requested by Friday 28 October 2016.

Please address any comments or enquiries to:

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1 Overview

1.1 In this consultation paper (CP) the Prudential Regulation Authority (PRA) sets out proposals for data that the PRA intends to collect in connection with the final policy on operational continuity set out within Supervisory Statement (SS) 9/16 'Ensuring operational continuity in resolution' and the General Organisational Requirements and Outsourcing Parts of the PRA Rulebook.¹

1.2 This CP is relevant to UK banks, building societies and UK designated investment firms (hereinafter 'firms') that provide functions that are critical to the economy and that need to be continued in resolution. The proposals are intended to apply to those firms in scope of the application thresholds set out in 1.1 of the Operational Continuity Part of the PRA Rulebook.²

1.3 The operational continuity policy supports the resilience and resolvability of firms including by seeking to ensure that group providers of critical services supporting such functions have sufficient financial resources to allow the continuation of the provision of critical services to recipient entities in the event of stress or resolution.³

1.4 The proposed reporting requirements in this CP will help the PRA to monitor the financial resources available to a group provider to ensure the continued provision of critical services.⁴

Structure of the CP

1.5 The CP is structured as follows:

- (a) Chapter 2 sets out proposals for firms to report on the activities and financial resources of their group provider(s). This will enable the PRA to monitor its expectations for the adequacy of a group provider's liquid assets.
- (b) Chapter 3 sets out the PRA's statutory obligations.

1.6 The appendices to this CP set out proposed amendments to the Regulatory Reporting Part of the PRA Rulebook, proposed amendments to SS34/15 'Guidelines for completing regulatory returns', a draft reporting template 'PRA117' and draft reporting instructions.

Implementation

1.7 The reporting policy contained in this CP has been designed in the context of the current UK and EU regulatory framework. The PRA will keep the policy under review to assess whether any changes would be required due to changes in the UK regulatory framework, including those arising once any new arrangements with the European Union take effect. The PRA intends any eventual rules and reporting to apply from 1 January 2019.

1 July 2016, available at:

www.bankofengland.co.uk/pr/Pages/publications/ss/916/ss916.aspx.

2 A new term 'operational continuity firm' has been introduced in the draft rules to describe those firms to which Operational Continuity Part applies. However, the term 'firm' is used in this CP for ease of reference.

3 A group provider in relation to a recipient firm is either a member of its group that provides critical services or a firm itself if one of its business units provides critical services to it.

4 FSMA requirement, S138J(b).

Responses and next steps

1.8 This consultation closes on Friday 28 October 2016. The PRA invites feedback on the proposals set out in this consultation. Please address any comments or enquiries to CP28_16@bankofengland.co.uk.

1.9 The PRA also invites firms to include in their responses their own assessment of the impact of the proposals set out in this CP.

2 Proposed reporting requirements for operational continuity

2.1 This chapter sets out the PRA's proposals and approach for the data it intends to collect in connection with the requirements in the General Organisational Requirement Part, the Outsourcing Part and the final operational continuity policy set out in SS9/16.

Reporting proposals

2.2 Firms are required to meet the General Organisational Requirements 2.5 and Outsourcing 2.6 with regard to the group provider having adequate resources.

2.3 Chapter 5 of SS9/16 specifically sets out that firms should ensure that, as a minimum, a group provider should be supported by liquidity resources equivalent to at least 50% of annual fixed overheads of the critical services provided by the group provider.

2.4 This is a minimum expectation only and the PRA expects firms to analyse and establish the adequate level of resources needed to ensure a group provider can manage the risks it is exposed to in stress or a resolution event.

2.5 The PRA will require data on the group provider's activities to enable it to monitor whether firms meet the expectation in Chapter 5 of SS9/16. Data about a group provider's operating expenses will enable the PRA to monitor and identify the appropriate level of liquid assets the group provider should hold. Data about the type, location and amount of the liquid resources used by the group provider will enable the PRA to assess whether the liquidity expectation is being met.

2.6 The PRA also considers that it will require information on how services are charged back to entities within the group. The information will allow the PRA to understand the transfers of funds across the group, which could have an impact on cash flow in the event of a resolution of group entities receiving critical services.

Process

2.7 The PRA proposes that firms in scope will be required to submit the information annually, on a calendar year basis. Such firms must submit the information 45 business days after the first reporting period ending 31 December 2019, with the first submission due in March 2020.

Application of requirements on groups

2.8 The reporting proposals in this CP are intended to apply to firms that are in scope of the application thresholds set out in Operational Continuity 1.1. Where more than one firm within a group is caught by the proposals, the PRA proposes to allow the group to allocate one firm to submit the template(s) on behalf of the other group members.

Reporting systems

2.9 The PRA expects the data described in this CP will be collected by electronic means, as for other regulatory reporting.

Approach to the reporting requirements

2.10 The reporting requirements proposed in this CP are new and have been designed to not duplicate information that firms already provide.

2.11 The PRA has designed the templates and guidance to provide sufficient information to allow the PRA to identify where firms are potentially not compliant with General Organisational Requirements 2.5, Outsourcing 2.6 or SS9/16, or are taking on risks that might adversely affect the continuity of the provision of critical services. This may in turn trigger further investigation and additional information requests.

3 The PRA's statutory obligations

3.1 Before making any rules, the Financial Services and Markets Act 2000 (the 'Act') requires the PRA to publish a draft of the proposed rules accompanied by:

- a cost benefit analysis;
- a statement as to whether the impact of the proposed rules on mutuals will be significantly different from the impact on other firms;¹
- an explanation of the PRA's reasons for believing that making the proposed rules is compatible with the PRA's duty to act in a way that advances its general objective, insurance objective (if applicable), and secondary competition objective;² and
- an explanation of the PRA's reasons for believing that making the proposed rules are compatible with its duty to have regard to the regulatory principles.³

3.2 The PRA is also required by the Equalities Act 2010 to have due regard to the need to eliminate discrimination and to promote equality of opportunity in carrying out its policies, services and functions.⁴

Cost benefit analysis

Scope of assessment

3.3 The analysis of the overall costs and benefits of the PRA's proposals to ensure operational continuity, including requirements to ensure the financial resilience of group providers, was set out in CP38/15 'Ensuring operational continuity in resolution'.⁵ Policy Statement (PS) 21/16 'Ensuring operational continuity in resolution' noted that the PRA would publish a separate consultation on reporting requirements relating to operational continuity.⁶ The incremental costs and benefits associated with these reporting requirements are assessed in this section.

1 Section 138K of the Act.

2 Section 2B, 2C and 2H(1) of the Act.

3 Sections 2H(2) and 3B of the Act.

4 Section 149 of the Act.

5 October 2015, available at: www.bankofengland.co.uk/pr/Pages/publications/cp/3815/cp3815.aspx.

6 July 2016, available at: www.bankofengland.co.uk/pr/Pages/publications/ps/2116/ps2116.aspx.

3.4 The reporting proposals in this CP are intended to apply to firms in scope of the application thresholds set out in Operational Continuity 1.1. The PRA estimates that, based on year-end regulatory data from 2014/2015, at least 65 firms might be affected by the proposals. Some of these firms may have bank insolvency procedure as their preferred resolution strategy and not have critical services supporting functions critical to the economy that need to be continued in resolution. In these cases, the PRA may consider that a firm meets one of the statutory tests for a waiver or modification under section 138A of FSMA. Where a firm qualifies for a waiver from the Operational Continuity Part, the PRA may consider that the firm also meets the statutory test for a waiver from the rules proposed in this CP.

Benefits

3.5 CP38/15 set out that the operational continuity proposals would allow firms to be more easily restructured in recovery or in post-resolution without imposing substantial costs on the UK financial system. If firms can be resolved in an orderly manner, this should reduce implicit taxpayer subsidies, which should in turn reduce incentives for excessive risk taking by firms.

3.6 The financial resilience requirements set out in SS9/16 will help deliver these benefits by ensuring that group providers have sufficient resources to manage the risks that they may be exposed to in a failure or resolution event, such as temporary loss of revenue due to suspension of payment, employee costs and expense-revenue mismatch.

3.7 The reporting proposals in this CP will enable effective supervision of the financial resilience expectations set out in SS9/16 and the requirements in General Organisational Requirements 2.5 and Outsourcing 2.6 regarding service providers having adequate financial resources. The proposals support the intended outcomes of these policies by ensuring firms comply with the expectations on an ongoing basis.

Direct costs to firms

3.8 Direct costs to firms of meeting the proposals in this CP are two-fold: initial implementation costs and the ongoing costs associated with compliance.

3.9 Group providers are expected to incur an initial set up cost from collecting the data required for the proposed reporting template. However, this is expected to be limited as: i) firms should already have data on operational costs needed to monitor the group provider's financial resilience; and ii) the number of data points required is small.

3.10 There may be some ongoing staff costs for manual manipulations, data quality checking and/or sign off processes. But, again, these are expected to be limited for the reasons set out in 3.9.

3.11 The PRA expects that the initial implementation and ongoing compliance costs will be lower for smaller firms in scope of the proposals. Smaller firms are typically less complex and have fewer functions that are critical to the economy when compared with larger firms. Critical services are therefore less likely to be shared across a number of entities performing critical functions, so reporting and identification of data items should be more straightforward.

Costs to the PRA

3.12 There will be set-up costs and ongoing maintenance costs for the PRA to ensure that it can process and analyse data. Due to the ongoing work of defining the Bank of England's future systems, the costs for the PRA cannot be quantified at this stage. There will be ongoing staff costs for quality checking and monitoring the data.

Impact on mutuals

3.13 FSMA requires that the PRA assess whether, in its opinion, the impact of the proposed rules on mutuals will be significantly different from the impact on other firms.¹ The proposals will affect some building societies, however, the costs are not expected to be substantially different from the costs incurred by banks of similar size. The PRA considers that these proposals will not have a significantly different impact on mutuals compared with other firms subject to these rules.

Impact on competition

3.14 When discharging its general rule-making function, the PRA is legally required, as far as is reasonably possible, to facilitate effective competition in the markets for services provided by PRA-authorized persons in carrying on regulated activities.²

3.15 The operational continuity policy supports the PRA's wider resolution agenda aimed at ending too-big-to-fail. The PRA expects the policy to have a positive effect on competition as it helps to mitigate distortions to competition related to implicit government support that favours larger institutions.

3.16 The implementation and compliance costs of the proposed reporting in this CP are expected to be limited. The PRA therefore does not expect the proposals to lead to a competitive disadvantage for new entrants and smaller firms compared to large firms in the relevant markets.

Regulatory principles

3.17 In developing the proposals in this CP, the PRA has had regard to the eight regulatory principles as set out in section 3B of FSMA.³ Of these, three principles are of particular relevance:

- *The principle that a burden or restriction which is imposed on a person, or on the carrying on of an activity, should be proportionate to the benefits, considered in general terms, which are expected to result from the imposition of that burden or restriction.* The PRA has followed this principle when developing the proposals outlined in this CP, and has indicated in the CP the key areas of its judgements. The PRA's approach of only being prescriptive where necessary, and assessing that the only structured reporting required for operational continuity is for financial resilience, is consistent with taking a proportionate approach.
- *The principle that the PRA should exercise its functions as transparently as possible.* In this CP, the PRA sets out all the key information relevant to its proposals, and gives respondents the opportunity to comment.
- *The need to use the resources of each regulator in the most efficient and economic way.* There will be costs to the PRA in collecting and analysing the data collected under the proposed reporting requirements. The PRA's proposed approach to reporting will enable supervisors to identify areas where further investigation would be appropriate and thus allow for an efficient allocation of supervisory resource.

1 Section 138K of FSMA.

2 See s.2H FSMA.

3 See s.2H and s.3B FSMA.

Equality and diversity

3.18 In making its rules and establishing its practices and procedures, the PRA may not act in an unlawfully discriminatory manner. It is required, under the Equalities Act 2010, to have due regard to the need to eliminate discrimination and to promote equality of opportunity in carrying out its policies, services and functions.¹ To meet this requirement, the PRA has performed an assessment of the policy proposals and does not consider that the proposals give rise to equality and diversity implications.

¹ Equalities Act 2010, section 149(1).

Appendices

1	Draft Operational Continuity Reporting Instrument
2	Draft amendments to Supervisory Statement 34/15 'Guidelines for completing regulatory reports'
3	Draft guidelines for completing PRA117 – Operational continuity
4	Draft reporting template – PRA117 – Operational continuity

Appendix 1: Draft Operational Continuity Reporting Instrument

PRA RULEBOOK: CRR FIRMS: OPERATIONAL CONTINUITY REPORTING INSTRUMENT 2016

Powers exercised

- A. The Prudential Regulation Authority (“PRA”) makes this instrument in the exercise of the following powers and related provisions in the Financial Services and Markets Act 2000 (“the Act”):
- (1) section 137G (The PRA’s general rules);
 - (2) section 137T (General supplementary powers);
- B. The rule-making powers referred to above are specified for the purpose of section 138G(2) (Rule-making instruments) of the Act.

Pre-conditions to making

- C. In accordance with section 138J of the Act (Consultation by the PRA), the PRA consulted the Financial Conduct Authority. After consulting, the PRA published a draft of proposed rules and had regard to representations made.

PRA Rulebook: CRR Firms: Operational Continuity Reporting Instrument 2016

- D. The PRA makes the rules in Annex A to C of this instrument.

Commencement

- E. This instrument comes into force on [DATE].

Citation

- F. This instrument may be cited as the PRA Rulebook: CRR Firms: Operational Continuity Reporting Instrument 2016.

By order of the Board of the Prudential Regulation Authority

[DATE]

Annex A

Amendments to the Regulatory Reporting Part

In this Annex, new text is underlined and deleted text is struck through. The following draft rules amend the Regulatory Reporting Part as it will be amended by the rules which are under consultation in CP17/6 and CP25/16.

1 APPLICATION AND DEFINITIONS

...

1.2 In this Part, the following definitions shall apply:

...

Operational continuity firm

means a firm that Operational Continuity applies to.

...

2 REPORTING REQUIREMENTS – DATA ITEMS

...

2.9 An operational continuity firm must also submit operational continuity returns as required by Chapter 21.

...

16 DATA ITEMS AND OTHER FORMS

...

16.43 PRA117 can be found here.

...

21 OPERATIONAL CONTINUITY REPORTING

21.1 This Chapter applies to an operational continuity firm.

21.2 An operational continuity firm must submit to the PRA annually (on a calendar year basis) within 45 business days after the end of the calendar year, the duly completed data item PRA117.

21.3 If a group includes more than one operational continuity firm that receives critical services from the same group provider, a single data item may be completed and submitted to satisfy the reporting requirement for those operational continuity firms. Nevertheless, the reporting requirement and the responsibility for submitting the data item remains with each operational continuity firm in the group.

21.4 A single *data item* under 21.3 must indicate all the *operational continuity firms* on whose behalf it is submitted and include the information required from all *operational continuity firms* on whose behalf it is submitted.

Annex B

Amendments to the Operational Continuity Part

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

1. APPLICATION AND DEFINITIONS

...

1.5 In this Part, the following definitions shall apply:

...

critical services

~~means activities, functions or services performed for one or more business units of the firm or for the firm and another member of its group, whether by the firm itself, any other group member or a person outside the firm's group, the failure of which would lead to the collapse of or present a serious impediment to the performance of the firm's critical functions.~~

...

group provider

~~in relation to a firm, means~~

~~(1) a member of its group that provides critical services to it; or~~

~~(2) the firm itself if one of its business units provides the critical services to it.~~

...

Annex C

Amendments to the Glossary

In this Annex new text is underlined:

...

critical services

means activities, functions or services performed for one or more business units of the firm or for the firm and another member of its group, whether by the firm itself, any other group member or a person outside the firm's group, the failure of which would lead to the collapse of or present a serious impediment to the performance of the firm's critical functions.

...

group provider

in relation to a firm, means

(1) a member of its group that provides critical services to it; or

(2) the firm itself if one of its business units provides the critical services to it.

...

Appendix 2: Draft amendments to Supervisory Statement 34/15 ‘Guidelines for completing regulatory reports’

In this Appendix changes to SS34/15 ‘Guidelines for completing regulatory reports’ are underlined and deleted text is struck through. Please note SS34/15 is also being consulted on as part of CP25/16.¹

1 Overview

...

1.4 The guidance on completing data items is set out in a series of appendices to this supervisory statement.

Appendix	Data items	Description
1	FSA005 to FSA053; PRA101 to PRA116	Guidelines for completing data items FSA005 to FSA053; PRA101 to PRA116
2	MLAR	Notes for completing Mortgage Lenders and Administrators Return
3a	CQ	Notes for completing the quarterly return for Credit Unions
3b	CY	Notes for completing the annual return for Credit Unions
4	Prudent Valuation	Guidelines for completing the prudent valuation return
5	Close links monthly report	Guidelines for completing the close links monthly report
6	Close links annual report	Guidelines for completing the close links annual report
7	Controllers report	Guidelines for completing the controllers report
<u>8</u>	<u>PRA117</u>	<u>Guidelines for completing the data items in PRA117</u>

Appendices

8 Guidelines for completing PRA117 – Operational continuity

¹ PRA Consultation Paper 25/16 ‘The implementation of ring-fencing: reporting and residual matters’ July 2016 (Appendix 2): www.bankofengland.co.uk/pr/Pages/publications/cp/2016/cp2516.aspx.

Appendix 3: Draft guidelines for completing PRA117 - Operational continuity

PRA117 - Operational continuity

General information

Firms should complete the following mandatory fields:

- the basis of their reporting;
- the submission number – *firms* should enter '1' and increase this number by '1' in case of resubmission;
- the unique 'firm reference number' (FRN);
- the name of the *firm*;
- the reporting period start and end dates; and
- the reporting currency – *firms* should report in the currency of their annual audited accounts.

Units

All amounts should be reported in absolute values rounded to the nearest whole number in reporting currency. Where values correspond to percentages, these should be entered to two decimal places.

Data elements

The data elements are referred to by row (r) or column (c).

Definitions

Defined terms are italicised. All defined terms correspond with definitions used in the PRA Rulebook.

Overview

The template should be completed annually by an *operational continuity firm*. If the *operational continuity firm* uses more than one *group provider* then it is expected to report a template for each *group provider* it uses. If a *group* includes more than one *operational continuity firm* that receives *critical services* from the same *group provider*, a template should be completed for each *operational continuity firm*. However, one *operational continuity firm* can submit on behalf of other *operational continuity firms*.

The template is structured in 5 sections:

- Part 1: Group service arrangement
This part identifies the receiver and provider of the *critical services*. The key components are: r010 of part 1 to include details on the *operational continuity firm* receiving the *critical services* and r020 of part 1 to include details of the *group provider* the *operational continuity firm* is using.

- Part 2: Operational costs

This part sets out the costs associated with carrying on the operational activities of the *group provider* related to the provision of the *critical services* it undertakes. This includes fixed and discretionary operational costs, unless stated otherwise.

Operational continuity firms should not double count between categories.

The key operational cost components are:

- **Salaries** in r010, c010 of part 2 to include the fixed staff costs associated with the *critical services* provided by the *group provider*. Including wages and guaranteed bonuses of all directly employed, temporary, contracted, indirectly allocated or transferred staff.
- **Discretionary / Bonus** in r020, c010 of part 2 to include all discretionary staff costs associated with the *critical services* provided by the *group provider*. Including discretionary bonuses, commissions, benefits, recruitment, training, severance and retention costs of all directly employed, temporary, contracted, indirectly allocated or transferred staff.
- **Pension** in r030, c010 of part 2 to include the annual costs of employer contributions for staff undertaking *critical services* provision for the *group provider*. In addition, any forecasted shortfall resulting from the actuarial valuation process.
- **Total people costs** in r040, c010 of part 2 to include the sum of the costs reported in r010 to r030, c 010 above.
- **Real estate / Occupancy** in r050, c010 of part 2 to include all expenses related to the rental, lease depreciation, maintenance or running of property used by the operations functions for *critical services* provision. Where the property is shared the basis for the allocation should be identified.
- **IT / Machinery** in r060, c010 of part 2 to include all related costs either as expensed items or where capitalised in the form of depreciated costs related to the *critical services* provided by the *group provider*.
- **Legal / Litigation** in r070, c010 of part 2 to include the costs which are not reflected in the total people or real-estate categories above, so are likely to reflect third-party costs of contracted-in services or damages related to operational processes for *critical services* provision by the *group provider*.

- **Third party services** in r080, c010 of part 2 to include the annual cost of the *group provider* utilising *critical services* from a third party service provider.
 - **Printing / Stationary** in r090, c010 of part 2 to include the annual costs of printing and stationary costs for running the *critical services* provided by the *group provider*.
 - **Travel / Entertainment** in r100, c010 of part 2 to include the annual costs of travel / entertainment for the operational staff undertaking the *critical services* provided by the *group provider*.
 - **Marketing** in r110, c010 of part 2 to include any advertising and marketing costs which the *group provider* is responsible for related to *critical services* provision - if none, then this would be a 'not applicable'.
 - **Licensing** in r120, c010 of part 2 to include the annual costs associated with licensing used for the *critical services* provided by the *group provider*, such as software licences.
 - **Other** in r130, c010 of part 2 to include any other annual operational costs related to *critical services* provided by the *group provider* that are not captured in the categories listed in r010 to r120, c010 above.
 - **Total operational costs** in r140, c010 of part 2 to include the total fixed and discretionary operational costs associated with the *critical services* provided by the *group provider*. This should be the sum of r010 to r150, c010 of part 1.
- **Part 3: Recharge cost**
Where *critical services* are being charged back to *group* entities (including, but not limited to, *the operational continuity firm*), part 3 should identify the cost charged between the entities within the *group* to the *group provider*.

The aim of this section is to understand transfers of income across the group where income either: i) flows out from the *group provider*; or ii) flows into the *group provider* which may have a material impact on income flow should it fail to be provided in the event of resolution.

This part potentially overlaps with some of the costs identified within the operational cost categories in part 2 but gives an understanding of which other *group* entities are utilising the *group provider* and any adjustments that may need to be made to the cost of the provision.

- Part 4: Financial resilience expectation

This part sets out the annual cost base to support the *critical services* provided to recipient entities from the *group provider*. It is based upon the financial resilience expectation in SS9/16. The *group provider* should, as a minimum, be supported by liquidity resources equivalent to 50% of annual fixed overheads of the *critical services* provision.

The following definitions apply to the table:

- **Annual fixed overheads** in r010, c010 of part 4 to include the annual fixed overhead costs of the *critical services* provided by the *group provider*. The *group provider's* discretionary operational costs should be deducted from the total operational costs reported in r150, c010 of part 2, as defined in paragraph 4.6 of the SS9/16.
 - **Liquidity asset expectation** in r020, c010 of part 4 to include the liquid assets held by the *group provider* to meet the expectation in numerical terms. This should be, as a minimum, equal to 50% of the annual fixed overhead cost of the *critical services* provided by the *group provider*. But could be larger depending on the assessment of the risks/costs that the *group provider* may be exposed to in a stress or resolution event. This number should reflect what the *firm* thinks it should be holding to meet the expectation.
- Part 5: Financial resilience resources
- This part sets out the amount, type and location of the liquid resources the *group provider* has to meet the financial resource expectation for *critical services* provision.

The key components of the table include:

- **Asset type** in r999a, c010 of part 5 to include the assets used to meet the liquid asset expectation.
- **Location of resources** in r999a, c020 of part 5 to include the entity holding the liquid asset for the *group provider* - this could be the *group provider*, the operating bank, the parent entity or an external third party. The location of the liquid asset should meet the expectation in 5.7 of SS9/16 to ensure that liquidity resources for the provision of *critical services* are segregated from other *group* liquid assets.
- **Resource amount** in r999a, c030 of part 5 to include the amount of the particular type of asset held.

Appendix 4: Draft reporting template - PRA117 - Operational continuity

PRA117 - Operational continuity

General Information

1	Name of the template	
2	PRA template version control	
3	Basis of reporting	
4	Submission number <i>(increase by 1 if resubmission)</i>	
5	Firm reference number <i>(FRN)</i>	
6	Name of the firm	
7	Reporting period start date	
8	Reporting period end date	
9	Reporting currency	
10	Currency reporting unit	

Part 1: Group service arrangement

010	Name of firm receiving critical services	
020	Name of group provider	

Part 2: Operating cost

		Group provider
		010
	Operational costs	
010	Salaries	
020	Discretionary / Bonus	
030	Pension	
040	Total people costs	
050	Real estate / Occupancy	
060	IT / Machinery	
070	Legal / Litigation	
080	Third party services	
090	Printing / Stationery	
100	Travel / Entertainment	
110	Marketing	
120	Licensing	
130	Other	
140	Total operational costs	

Part 3: Recharge cost

		Firm receiving critical services	Group provider
		010	020
999a	Inwards		
999b	Outwards		

*(row reference 999 signifies 'open' rows, ie the row is repeated as many times as is needed. Example in COREP is LE)
 (in this case, the pair of rows is repeated for each legal entity. Expectation is for up to 10 entities)*

Part 4: Financial resilience expectation

		Group provider
		010
010	Annual fixed overhead costs	
020	Liquid asset expectation	

Part 5: Financial resilience resources

	Asset type	Location of resources	Resource amount
	010	020	030
999a			
999b			