

## Buy-to-Let data collection - Frequently Asked Questions

This is a selection of the most frequently asked questions along with answers. If you require any further assistance please

[contact us](#).

### Submitting and Testing Data

#### How will firms be notified about their reporting?

The Bank has notified statistical contacts within firms likely to be in-scope of reporting, based on the thresholds that can be found from this [page](#) under 'New and Upcoming'. If anyone is unsure whether a letter has been sent to their firm, they can email [DataReception@bankofengland.co.uk](mailto:DataReception@bankofengland.co.uk).

#### How will the data be submitted?

Data will be submitted via an XML schema. Further details are available at <http://www.bankofengland.co.uk/statistics/Pages/reporters/defs/default.aspx>, filtering for 'BTL'.

The Bank is collecting the buy-to-let data via [BEEDS](#).

#### Will there be any file size restrictions?

No. File should be compressed.

#### Is there a naming convention for the submitted files?

No

#### Will phase 3 (corporate) be reported separately to phases 1 and 2 (retail)?

Yes

#### Should buy-to-let data be reported to both the Bank and the CML?

The Bank expects data will be submitted both to the Bank and CML. These two reporting streams will remain entirely separate.

#### How can a firm's LEI number be identified?

This source can be used to identify LEIs: <https://www.gleif.org/en/lei/search/>. Please note some firms will have multiple LEIs.

#### Does a file need to be submitted if there are no completions/advances in the reporting period?

Yes, if there are no regulated mortgage completions in the reporting period, a "nil return" should be submitted.

#### How should revised data be submitted?

See page 36 of the [technical documentation](#). When a file is first submitted the transactions status for all loans should be NEW. If any of the attributes of the loan are amended in a subsequent resubmission, the transaction status should be changed to CORR. If the loan is subsequently deleted, the transaction status should be changed to DEL. For loans that are unchanged, these should remain as NEW.

## Reporting Timeline

### What is the frequency of reporting?

The Bank requires files to be submitted on a quarterly basis.

### When is the due date for submitting to the Bank's collection?

Files are to be first delivered to the Bank on 20<sup>th</sup> working day after the end of the quarter. Exact reporting deadlines for 2017 can be found here:

<http://www.bankofengland.co.uk/statistics/Documents/reporters/defs/repsched17.pdf>

Additional attributes from the retail book (Phase 2) are to be delivered in April 2018 for Q1 2018 data. Data attributes for lending from the corporate book (Phase 3) are due in October 2018 for Q3 2018 data.

## General definitions

### How should mortgages that have more than one account be reported?

Where a mortgage has more than one account (for example a part-and part mortgage with one account for a capital and interest element, and another for interest-only) firms should report this as one conflated sales transaction, with the Loan Amount equating to the sum of all the elements.

Where different elements have different characteristics, for example interest rate or term, firms should report the characteristics applicable to the largest element.

### At what point should a mortgage sale be reported?

New sales should be reported at the point of completion (i.e. when the funds have been transferred).

### Are loan performance data to be included?

No, it is only new completions data for this requirement.

### Should loans to a corporation be included?

All new buy-to-let loans should be included regardless of whether they are lent to a business or an individual. Loans issued through the retail book should be included in Phases 1 and 2, while loans issued through the corporate book should only be included in Phase 3.

### How should loans be reported where funds are retained until remedial work on the property is completed?

For partial retentions, the Bank would expect the initial loan to be reported in relation to the date of completion/drawdown of initial funds. The property valuation should be the expected final value of property at the time the lending decision is made. In both cases, the number of bedrooms, house in multiple occupation and monthly rental income should relate to the details recorded at the time of application, in relation to the final property characteristics. These should not be updated.

The subsequent retained funds should be reported as a further advance with a date relating to the subsequent drawdown of funds and a unique transaction reference. If the revised valuation has a role in the further advance, it should be reported. If no fees are paid at the time of further advances, they shouldn't be reported. If the further advance gets repaid by the same date than the initial one, that part should have a shorter maturity, accordingly.

For full retentions, we would not want the initial loan reported in relation to the date of completion (with zero funds), but would expect the loan to be reported in relation to the drawdown of the funds.

## **Retail (phase 1 and 2) definitions**

### **Should loans subject to any type of regulation (CBTL or MCOB) be included in this collection?**

All buy-to-let loans should be reported, regardless of whether it is subject to regulation.

### **Should fees that are paid upfront by the borrower be included, or only those that have been wrapped into the final amount advanced?**

Within Lender Fee Amount report all fees that are included in the annual percentage rate of charge, whether paid upfront or included in the loan. Fees included in the loan should be reported as Capitalised Fees and within Loan Amount.

### **Should interest rates include fees?**

Interest rates should be reported gross of fees and cashback (i.e. fees and cashback should be excluded).

### **What reversion rate should be reported when there is more than one (for example a fixed rate, reverting to a tracker, and then an SVR)?**

Report the reversion rate as the final rate; in this case the reversion rate type would be an SVR.

### **For remortgages where extra money is lent, should the full amount or just the equity withdrawn be reported within the Extra Money Lent field?**

In Extra Money Lent, report only the value of additional money lent over and above the previous mortgage.

### **Does the definition of a remortgage include internal refinance?**

Further advances to an existing borrower of the firm, secured on an existing property should be reported as a Further Advance. This should also include internal refinancing, where the borrower is increasing the overall secured debt (also known as internal refinancing).

### **Should we report a ported loan as a new sales transaction?**

If a loan is ported with no additional borrowing, it does not need to be included. If a loan is ported with additional borrowing, the additional borrowing should be listed as a Further Advance.

### **If a customer switches to a new product or ports an existing loan, and this results in borrowing to cover the fee, is this to be reported as "Extra Money Raised"?**

No, if the only additional borrowing is a fee, do not report this as new borrowing.

### **What is the distinction between 'Let to Buy' and 'Consent to Let'?**

If the loan had previously been a residential mortgage, and the customer had been given temporary Consent-to-let permission, the loan would only be reportable as a consent-to let conversion if and when the customer formally refinances with a Buy-to-let product. This presumes there is no corresponding house purchase for the customer's own residence.

If the customer wants to raise funds from the rented property to finance the purchase of a residential property, only at the point would the loan be reportable as let-to-buy.

### **If a customer wants to remortgage and switch lenders at the same time, is the new lender expected to know whether the previous mortgage was a BTL mortgage, or a residential mortgage with Consent to Let Status?**

Ideally, all cases of Consent-to-let conversion should be reported, but there may be some cases where it is not be feasible to know what the exact status was with the previous lender. For a special case like this, lenders should discuss bilaterally with the Bank by contacting [srdd\\_btl\\_consultation@bankofengland.co.uk](mailto:srdd_btl_consultation@bankofengland.co.uk)

**How should firms classify a dwelling as "new"?**

"New dwelling" should cover the condition that the property is being occupied for the first time.

**How to report loans on unencumbered properties?**

Loans secured against previously unencumbered properties should be reported as remortgages.

**How should property reference be reported?**

Any reference may be used as long as it uniquely identifies properties within the reporting firm, e.g. the Unique Property Reference Number (UPRN)

**Corporate (phase 3) definitions****What is the definition of a "corporate loan book"?**

The definition of a "corporate loan book" will vary. Firms typically carry out their retail and corporate business in separate areas of the firm, using distinct systems. Therefore, the retail and corporate book split is determined by how firms practically assign their business. However, loans that are easily identifiable as buy-to-let are likely to be part of the retail book; loans that are more broadly secured on rental residential property, more likely to be to corporate customers and not generally identifiable as 'buy-to-let' and are usually held on a different system. Some firms may do this through different entities rather than different business units.

**Should a firm's wealth book be reported?**

If wealth management division clients are treated as 'corporate book' by the firm and can be identified as such then they should be reported. If in doubt, the Bank will discuss with the firm on a bilateral basis.

**How should firms classify multi-let apartments?**

If the property is owned by one landlord with several tenants and shared services then it should be classed as 'multi-unit freehold blocks' under 'Type of Dwelling'.

**Should all drawdowns be reported?**

The initial drawdown and all subsequent drawdowns should be reported, according to the date of the drawdown. If a loan has multiple drawdowns within the same reporting period, the drawdowns should be reported separately.

**Are overdraft facilities in scope?**

No, overdraft facilities are not in scope for the phase 3 collections.