

CRD IV Alert XBRL Special - February 2016

This edition of our CRD-IV Alert XBRL Special discusses the processing procedure of CRD-IV reports for banks and the obligatory tests that must be performed between June and September 2016.

1. Processing of reports by DNB

From 1 October 2016 onwards, CRD IV reporters are to submit their reports to DNB via the new Digital Reporting Portal (Digitaal Loket Rapportages - DLR). E-line will remain in use for all other reports. This means that CRD-IV reporting commitments will be displayed in the DLR and the results of the data quality controls will be fed back in the DLR.

The institution's contact¹ will receive a prompting email every time DNB prepares new messages in the DLR on the results of its data processing. The email is a prompting email only and includes no information on the content of reporting obligations, nor on the submitted reports. Users must log on to the DLR to be able to view the information.

The DLR is described in detail in the user manual; an English version of this manual will be published on DNB's [website](#) in the course March.

Statistics Division
Banking Supervision
Statistics Department

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1.1 Checks

DNB performs several checks after the reports have been submitted in the DLR. These checks are performed according to the following verification stream

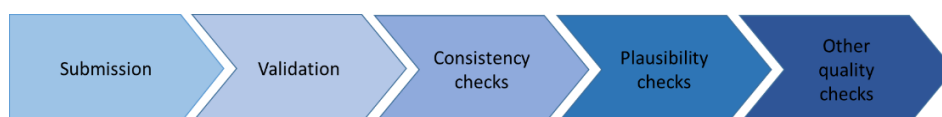


Figure 1: The components of DNB's reports processing chain

1.1.1 Submission

The institution uses *e-Herkenning* to log on to the DLR. Once in the secure environment, the institution selects an open reporting obligation and uploads the XBRL-file containing the reports accompanying the obligation. We expect institutions to check their reports on data quality and accuracy before submitting them to us. When the file is uploaded, it is immediately checked for the correct XBRL format and verified on whether the report itself and the reporting period correspond with the selected obligation. Possible errors immediately pop up on the screen.

After the reporting file has been successfully uploaded, DNB performs its checks. These checks are described under "Validation", the next step in the processing chain.

1.1.2 Validation

The validation process will start as soon as possible after receiving the file. The timing of our feedback on the validation results depends on the number of reports

¹ This is the email address that the institution has submitted in the DLR under "my details". A second contact name can be submitted for specific reports; this contact will also receive notifications regarding the specific report.

waiting for validation at that particular point in time. In most cases you will receive feedback on the same day; feedback will in all cases be provided before 7.00 a.m. the next business day.

In the validation process is verified whether the report adheres to the: XBRL syntax

1. EBA taxonomy
2. EBA filing rules
3. EBA validation rules

applicable in the relevant reporting period.

The report will not be accepted if it does not comply with the XBRL syntax, the applicable EBA filing rules and taxonomy for the reporting period, or with the validation rules that EBA earmarked as blocking. The reporting obligation will then remain open and the reporter will be obliged to submit a new and adjusted report. If the submitted report is found to comply with the applicable requirements, it will be accepted and its status will change to "completed" ². The DLR will always notify the reporter of the validation results.

If validation rules have been activated that do not have a blocking effect, re-submission can be requested, enabling the institution to correct its errors.

1.1.3 Consistency checks

Once the obligation has been given the "completed" status consistency checks will be executed. These checks will be published on our website, as they are now. If reporting errors emerge from these checks, the institution can be requested to re-submit the report enabling it to correct its error(s).

An element of the checks that we perform is verification whether the mandatory templates have been filled in. Which templates have to be filled in differs between institutions, depending on the characteristics of the institution. More information will be published on the [DNB website](#).

The results of the consistency checks will also be fed back by means of the DLR.

1.1.4 Plausibility checks

The consistency checks are followed by plausibility checks. These checks are also published on our website in advance, and their purpose is to identify deviating values. We will contact the reporter if the results of the plausibility checks give us cause for further questions. If the deviation found proves to have been caused by an error in the reported data, re-submission will be requested.

1.1.5 Other quality checks

We will perform other quality checks; the outcomes of these analyses may give us cause for further queries about the reported data and may result in requesting a re-submission. These checks have not been translated into verification rules and are not published in advance.

² It is not possible to submit a new version of a report that have been given the "completed" status.

2. Test schedule

We plan to start testing the submission of XBRL-reports in the DLR begin June 2016, the testing will end in the first week of September 2016.

The purpose of the testing period is to establish that

1. all reporters are able to submit CRD-IV reports in XBRL format;
2. the submitted CRD IV reports comply with the most recent EBA taxonomy and the validation and filing rules published by EBA, and
3. to enable reporters to familiarise themselves with the new digital reporting portal.

2.1 Scope of the test

The test will be limited to the steps of submission and validation in the reporting processing chain as described in section 1 of this "CRD-IV alert XBRL Special". So this test will not include the subsequent verification steps of consistency, plausibility and other quality checks.

2.2 Baseline criteria

Before you start testing the submission of XBRL-reports to us, we expect you to have tested the generation of XBRL-reports yourself and to have validated them successfully against the applicable EBA filing rules, taxonomy and validation rules. These filing rules, taxonomy and validation rules have been published and are available from the [EBA website](#)). This means that the test time frame is not intended to facilitate institutions' system development, nor to test the EBA validation rules.

In order to be able to run the tests, you must be in possession of an *eHerkenning* id. You will find more information on how to apply for an *eHerkenning* id in the [January issue of our CRD-IV alert XBRL Special](#).

2.3 Test participation is obligatory

All institutions are obliged to participate in the tests.

The actual production system will be used during the test period, with which we aim to reproduce the real production situation as closely as possible. This means that staff having access to the DLR at the time of the tests will continue to have access after 1 October 2016, and thus access to the production data from 1 October 2016 onwards. We do not anticipate any problems here as the institutions have already tested their systems development themselves. The test reports can be submitted by the same contacts that submit the actual supervision reports. Our purpose is that they familiarise themselves with working with the new DLR.

If institutions do not want the staff performing the tests to have access to the DLR after the tests have been completed, the reporting institution must revoke the *eHerkenning* authorisation for the staff in question before 1 October 2016.

2.4 Types of test

The test itself has three separate components. Institutions must complete each separate component successfully. The figure below depicts the test schedule for the different components. The actual test cases will be published at the end of April 2016.

2.4.1 Connectivity test

This test is expected to start at the beginning of June 2016 and must be completed before 15 July 2016. The purpose of this test is to verify that at least one member of staff of the reporting institution is able to log on to the DLR by means of *eHerkenning*.

2.4.2 Validation test

Reporters can start the validation test after successfully completing the connectivity test. The purpose of the test is to familiarise institutions with the feedback that we will make available in the DLR after the reports have been validated. The validation test must be completed by 19 August 2016. The precondition for starting this test is that the institution itself has already tested the production of XBRL-reports according to the EBA taxonomy.

In the validation test institutions are required to submit reports for all reporting obligations that apply to them. All relevant reporting obligations for an institution will be made available in the DLR. The test will include both "accepted" and "error" situations, to familiarise institutions with the different types of feedback from DNB.

2.4.3 Certification test

The certification test can be taken between 4 July and 9 September 2016 after the validation test has been successfully completed. The certification test requires institutions to submit an XBRL-report that complies with EBA taxonomy in force during the relevant reporting period, the EBA filing rules, and all EBA validation rules applying at that particular time. You will be required to use data based on production data, e.g. an XBRL-report including production data as used in second-quarter reports via e-Line DNB. In this way, institutions can demonstrate that the link-up with production data can be made successfully.

3. DPM 2.4

We had planned to base the test trajectory on DPM 2.4. This approach was based on EBA's projected implementation date of 1 July 2016. It is still unclear when DPM 2.4 will be implemented in the absence of approval from the European Commission of the new implementing technical standards (ITS) on reporting. Normally speaking, the new ITS are implemented minimally six months after formal approval at the earliest.

This means that there is a chance that on 1 October 2016 at the time of the transition to submission in XBRL format, DPM 2.3.2 will still be in force. If this happens, reports will be validated based on DPM 2.3.2 also during the test period. Due to the uncertainty about the implementation date of DPM 2.4, you must take account of the fact that you must be able to complete the test based on DPM 2.3.2 as well as DPM 2.4.

The current uncertainty does not detract from the fact that institutions must be able to work with several versions of DPM anyway. This is because after the six-month transitional period (see [January issue of our CRD-IV alert XBRL Special](#)) institutions must of course be able to re-submit reports in XBRL in the versions of DPM that were applicable at the time of the relevant reporting period, when they are requested to do so.

We will inform you as soon as we receive more information on the implementation date of DPM 2.4.

4. More information

Currently DNB is contacting all institutions to check on their progress in preparing for reporting in XBRL and to answer any questions. You can always contact the DNB project team at xbrl@dnb.nl in case you require more information or have questions.