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Bankarski rizik 54

SREP & SSM

Rezime

Ciljevi definisani standardima u Stubu II Bazelskog sporazuma II kao proces jačanja veze između rizičnog profila banke, načina upravljanja rizicima i pravilne procene potrebnog ekonomskog kapitala, baziraju na dva podjednako važna segmenta - dobro postavljenom okviru upravljanja rizicima u banci (strategija, proces) i efikasnom vođenju ovog procesa (ICAAP), kao i supervizorskoj reviziji i procesu evaluacije (SREP).

Ključne reči: upravljanje rizicima, interna procena kapitala, supervizorska revizija, proces evaluacije

JEL: G21, G31

Banking Risk 54

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Summary

The aims defined by the Basel Accord II, Pillar 2 as the process of enhancing the link between the bank's risk profile, its risk management and sound estimation of the required economic capital, are based on the two equally important components - a sound risk management framework in the bank (strategy, process) and effective management of the process (ICAAP), as well as the supervisory review and evaluation process (SREP).

Keywords: risk management, internal capital estimation, supervisory review, evaluation process

JEL: G21, G31

SREP je skraćenica od naziva dva pojma - supervizorska revizija i proces evaluacije (*Supervisory Review and Evaluation Proces*) i vezuje se za *novi sitem prudencione supervizije banaka - Single Supervisory Machanism - SSM*, čije su glavne karakteristike harmonizacija bankarske supervizije i konzistentna primena procedura supervizije u zemljama evropske bankarske unije, sa ciljem da se garantuje sigurnost i stabilnost evropskog bankarskog sistema.

European Banking Authority - EBA predložila je standardizovani pristup u julu 2014. u vidu nacrtu dokumenta pod nazivom „Vodič za zajedničke procedure i metodologije za supervizorsku reviziju i proces evaluacije“ (**SREP vodič**), sa preporukom da ga primenjuje Evropska centralna banka, kao i nacionalni supervizori zemalja članica Evropske unije, kada procenjuju i ocenjuju kreditne institucije. EBA okvir supervizorske revizije i procesa evaluacije (SREP vodič) ima sledećih devet elemenata:

- klasifikaciju bankarskih institucija (po veličini, strukturi, internoj organizaciji),
- monitoring ključnih indikatora rizika,
- analizu poslovnog modela bankarske institucije,
- procenu internog upravljanja i internog sistema kontrole,
- analizu kapitalnih rizika,
- analizu rizika likvidnosti,
- sumiranje ukupnih procena,
- definiciju i saopštavanje regulatornih mera i
- blagovremenu intervenciju supervizije.

Konsultacije po ovom nacrtu završene su u oktobru 2014. a kao datum početka primene određen je 1. januar 2016.

SREP koncept bazira se na *Jedinstvenom mehanizmu supervizije (Single Supervisory Mechanism - SSM)* banaka koji obuhvata:

- Evropsku centralnu banku (ECB) i
- kompetentne nacionalne organe zemalja članica (*National Competent Authorities - NCA*).

Jedinstveni mehanizam supervizije (SSM) je počeo da funkcioniše 4. novembra 2014. kada je ECB preuzela superviziju kreditnih institucija evrozona. Uspostavljanjem SSM sistema učinjen je prvi korak u formiranju bankarske unije Evrope, koja treba da se, osim ovog, bazira još na dva stuba:

- *Jedinstvenom mehanizmu sanacije*, koji

je u potpunosti operativan od januara 2016. a dizajniran je da osigura sanaciju insolventnih banaka, a da se pri tom ne ugrožava sistemska stabilnost i

- na budućoj *Zajedničkoj šemi osiguranja depozita banaka*.

Ciljevi uvođenja novog sistema banakrske supervizije (SSM), na napred navedeni način, bili su:

- da se obezbedi sigurniji i uspešniji evropski bankarski sistem,
- da se poveća finansijska povezanost i stabilnost i
- da se osigura konzistentnost bankarske supervizije.

Jedinstveni mehanizam supervizije (SSM), primenom kvantitativnih i kvalitativnih kriterijuma, pravi razliku između značajnih kreditnih institucija, koje su pod direktnom supervizijom ECB (120 grupa, prosečno 1.200 institucija) i manje značajnih kreditnih institucija koje su pod indirektnom supervizijom ECB, uz asistenciju NCA sa kojima se komunicira i koji izveštavaju ECB (oko 3.500 institucija).

ECB je definisala pravila, procedure i zajedničku metodologiju za razvoj Supervizorske revizije i procesa evaluacije (SREP - SSM), pomoću kojih će sistemi, strategije i mehanizmi primene od strane banaka biti pregledani. ECB je definisala i devet supervizorskih principa koji su osnova za supervizorsku aktivnost unutar SSM okvira i koji su ključni za efikasno funkcionisanje sistema. Reč je o sledećim principima:

- korišćenje najbolje prakse,
- integritet kompetentnih nacionalnih vlasti,
- homogenost u okviru SSM-a,
- konzistentnost sa pojedinačnim tržištima,
- nezavisnost i odgovornost, pristup baziran na riziku,
- proporcionalnost,
- adekvatni nivo supervizorske aktivnosti za sve kreditne institucije,
- efikasne i blagovremene korektivne mere.

Jedinstveni mehanizam supervizije (SSM) bazira na tri ključna segmenta: definicija i razvoj metodologije i standarda, supervizija na dnevnoj osnovi i provera u funkciji unapređenja potencijala supervizije.

Supervizorska procena i proces evaluacije u okviru SSM (SREP - SSM) obuhvata pet oblasti:

SREP is the abbreviation of the Supervisory Review and Evaluation Process and is related to the *new system of prudential supervision in banks - i.e. the Single Supervisory Mechanism - SSM*, whose main characteristics are harmonization and consistent procedures of the banking supervision in the countries of the European Banking Union, with the aim of guaranteeing the security and stability of the European banking system.

The *European Banking Authority - EBA* proposed a standardized approach in July 2014 in the form of the draft *Guidelines for common procedures and methodologies for the supervisory review and evaluation process (SREP guidelines)*, recommending its implementation by the European Central Bank, as well as by the national supervisory authorities of the Europe Union, when assessing and evaluating the institutions. EBA's framework for the supervisory review and evaluation process (SREP guidelines) comprises the following nine elements:

- Categorization of institutions (depending on their size, structure, internal organization);
- Monitoring of key risk indicators;
- Analysis of the banking institution's business model;
- Assessment of internal governance and control;
- Assessment of capital risks;
- Assessment of liquidity risks;
- Summary of total assessments;
- Definition and communication of regulatory measures, and
- Early intervention of the supervision.

The consultation stage concerning the draft ends on October 2014, the implementation date being set on January 1, 2016.

The SREP concept is based on the *Single Supervisory Mechanism - SSM* which comprises:

- The European Central Bank (ECB),
- The national competent authorities of the participating countries (National Competent Authorities - NCA).

The Single Supervisory Mechanism (SSM) started functioning on 4 November 2014 when the ECB took over the supervision of the Eurozone credit institutions. The SSM was the first step in creating the European Banking Union, which should be based, in addition to

this one, on two other pillars:

- *Single Resolution Mechanism* which has been fully operational since January 2016 and is designed to ensure the resolution of insolvent banks without affecting the systemic stability, and
- The future *Common Guarantee Deposit Scheme* for the banks.

The *objectives* of introducing the new system of banking supervision (SSM) are to:

- Ensure the safety and soundness of the European banking system.
- Increase financial integration and stability.
- Ensure consistent supervision.

Based on the quantitative and qualitative criteria, the SSM's supervision model distinguishes between the significant credit institutions, which are under the direct supervision of the ECB (120 groups, approximately 1,200 entities), and the less significant credit institutions (under the indirect supervision of the ECB, with the assistance of the NCA, communicating with and reporting to the ECB (around 3,500 entities).

The ECB has defined the rules, procedures and common methodologies for the development of the Supervisory Review and Evaluation Process (SREP - SSM), through which the systems, strategies and mechanisms implemented by entities will be reviewed. The EBC has defined nine supervisory principles which serve as the basis for the supervisory activity within the SSM framework and are crucial for the effective functioning of the system. These are the following principles:

- Use of best practice;
- Integrity and decentralization;
- Homogeneity within the SSM;
- Consistency with the single market;
- Independence and accountability;
- Risk based approach;
- Proportionality;
- Adequate levels of supervisory activity for all credit institutions;
- Effective and timely corrective measures.

The Single Supervisory Mechanism (SSM) is based on the three key pillars: definition and development of the methodology, day-to-day implementation of the supervision and the relevant controls in the function of improving the supervisory potential.

- kapital u odnosu na procenjenu izloženost riziku,
- procena adekvatnosti kapitala,
- procena adekvatnosti likvidne pozicije,
- ocena internog upravljanja i upravljanja rizicima i
- ocena poslovnog modela i profitabilnosti.

Zakonodavni okvir - Na osnovu regulative EU br 468/2014 Evropska centralna banka uspostavila je okvir za saradnju unutar *Jedinstvenog mehanizma supervizije Evropske centralne banke i kompetentnih nacionalnih organa i sa određenim nacionalnim organima (SSSM Framework regulation) (ECB/2014/17).*

Literatura / References

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2. Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions, Official journal of the European Union, October 2013. www.fktk.iv/texts-files

3. Council Regulation (EU) No 468/2014 of the European Central Bank of 16 April 2014 establishing the framework for cooperation within the Single Supervisory Mechanism European Central Bank and national competent authorities and with national designated authorities (SSM Framework Regulation) (ECB/2014/17)

Supervisory assessments within the SSM (SREP - SSM) cover the following five segments:

- Capital related risk score;
- Capital adequacy assessment;
- Liquidity adequacy assessment;
- Internal governance and risk management assessment;
- Business model and profitability assessment.

Legislation - Based on the regulation of the EU No. 468/2014, the European Central Bank established the framework for cooperation within the *Single Supervisory Mechanism of the European Central Bank and national competent authorities and with national designated authorities (SSM Framework Regulation) (ECB/2014/17)*.