Annex III
Supervisory review and evaluation process (SREP) – July 2020

Scope of application of SREP (Articles 108 to 110 of CRD)	Description of the approach of the competent authority to the scope of application of SREP including: · what types of institutions are covered by/excluded from SREP, especially if the scope is different from those specified in Regulation (EU) No 575/2013 and Directive 2013/36/EU; · a high-level overview of how the competent authority takes into account the principle of proportionality when considering the scope of SREP and frequency of assessment of various SREP elements(2).	**Significant Institutions** The ECB directly supervises all institutions that are classified as significant. Refer to the ECB disclosure for information on SREP for Significant Institutions (SIs) here. **Less Significant Institutions** The direct supervision of Less Significant Institutions (LSIs) is performed by the National Competent Authorities (NCAs), with the ECB responsible for exercising oversight over the functioning of the system. The scope of application of the SREP is defined as follows: • For the EU parent institution of a group, the evaluation is conducted primarily on a consolidated basis i.e. at the level of the group as a whole. This evaluation takes into consideration any matters arising from the evaluations of individual credit institutions i.e. at the level of the parent on a solo basis and of its principle subsidiaries. • If the CBI supervises a subsidiary that is consolidated into another credit institution, the evaluation is conducted primarily on a sub-consolidated basis. Account is nevertheless taken of the entity’s position within the group. • For entities that do not belong to a group, the SREP is conducted on a solo basis. With regard to proportionality, the Central Bank of Ireland utilises SSM prioritisations based on the ECB’s LSI prioritisation methodology. This allows flexibility to take into account the nature, size and complexity of the LSIs. The principle of proportionality is also taken into account when considering the frequency of assessment of various SREP elements in line with SSM LSI SREP Methodology, which is available here. **Investment Firms** A Full Risk Assessment (FRA) is conducted under the Central Bank’s supervisory risk framework (PRISM). The FRA is a comprehensive supervisory assessment of the risks in Investment Firms and is in line with the SREP approach for LSIs. With regard to prioritisation, for Investment Firms the Central Bank of Ireland utilises our in-house Probability Risk Impact System, “PRISM”. PRISM is a dedicated prioritisation framework that assists the

		Central Bank of Ireland with risk-based supervision. This tool differentiates Investment Firms based on their risk profile and their potential impact on the domestic financial system. This categorisation drives the level of supervisory engagement with the Investment Firm. For example, Medium-high impact CRD IV Investment Firms will have a FRA conducted every two to four years. These will consider the full spectrum of risks that an Investment Firm is likely to face. The Supervision Team will also take the scope and complexity of the Investment Firm into account as part of their assessment. The categorisation of Investment Firms from a probability perspective is subject to ongoing review.
Assessment of SREP elements (Articles 74 to 96 of CRD)	Description of the approach of the competent authority to the assessment of individual SREP elements (as referred to in EBA Guidelines on common procedures and methodologies for SREP- EBA/GL/2014/13) including: · a high-level overview of the assessment process and methodologies applied to the assessment of SREP elements, including: (1) business model analysis, (2) assessment of internal governance and institution-wide controls, (3) assessment of risks to capital, and (4) assessment of risks to liquidity and funding; · a high-level overview of how the competent authority takes into account the principle of proportionality when assessing individual SREP elements, including how the categorisation of institutions have been applied(3).	**Significant Institutions** Refer to the ECB disclosure for information on SREP for SIs here. **Less Significant Institutions** The SREP is completed in line with the EBA Guidelines, the scope of the SREP covers all Directive 2013/36/EU (CRD IV) and Regulation (EU) No. 575/2013 (CRR) requirements, and encompasses three main elements: • A Risk Assessment System (RAS) is used for evaluating an institution's risk levels and controls; • A comprehensive review of the institution's Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP); • A decision on relevant supervisory measures, if any. Consistent with the EBA Guidelines on SREP, the SREP is comprised of the following elements: • Business model assessment; • Internal governance and risk management assessment; • Assessment of risks to capital; and • Assessment of risks to liquidity and funding. The risks to which credit institutions are exposed are assessed by risk level and risk control, allowing for constrained supervisory judgement. Scoring is conducted in line with EBA Guidelines and SSM guidance. All risk elements are scored from 1-4 both on a risk level and risk control basis. These two scores are then combined to produce an overall score for the risk in question. The compilation of all risk elements score combine to produce an overall SREP score. The outcome of the risk assessment can result in supervisory actions and measures. The principle of proportionality is also taken into account when considering the frequency of assessment of various SREP elements in line with SSM LSI SREP Methodology, which is available here. SREP assessments incorporate desk-based reviews, meetings with the senior management within the bank, onsite inspections, thematic reviews, etc. For the 2020 exercise, the Central Bank of Ireland will

		adopt a pragmatic and effective SREP in accordance with the EBA statement on the matter. Such a pragmatic approach in undertaking the SREP will entail a risk-driven supervisory assessment focusing on the most material risks and vulnerabilities driven by the COVID-19 crisis based on most recent information received by supervisors. **Investment Firms** The scope of the FRA covers CRD IV and CRR requirements, and encompasses the following elements: • A review of the institution's ICAAP; and • A decision on relevant supervisory measures, if any. The Central Bank of Ireland's "PRISM" is consistent with the EBA Guidelines on SREP, and the FRA, which is conducted under the PRISM prioritisation framework, is comprised of the following elements: • Strategy/Business Model Risk; • Governance Risk; • Capital Risk; • Liquidity Risk • Credit Risk: • Market Risk; • Operational Risk; • Insurance Risk; • Environmental Risk; and • Conduct Risk. The risks to which Investment Firms are exposed are assessed by risk levels and risk controls, allowing for constrained supervisory judgement. The outcome of the risk assessment can result in supervisory actions and measures or Risk Mitigation Programmes ("RMP") which direct a firm to take appropriate steps to reduce the risks identified. The probability of the risk occurring is assessed for each risk and reflects the supervisor's assessment of the risk.
Review and evaluation of ICAAP and ILAAP (Articles 73, 86, 97, 98 and 103 of CRD)	Description of the approach of the competent authority to the review and evaluation of the internal capital adequacy assessment process (ICAAP) and internal liquidity adequacy assessment process (ILAAP) as part of the SREP, and, in particular, for assessing the reliability of the ICAAP and ILAAP capital and liquidity calculations for the purposes of determining additional own funds and quantitative liquidity requirements including(4):	**Significant Institutions** Refer to the ECB disclosure for information on SREP for SIs here. **Less Significant Institutions** An ICAAP and ILAAP review is conducted annually for all credit institutions. For credit institutions subject to a SREP in any given year, an in-depth review is carried out. This is a full review of the ICAAP and ILAAP as updated and submitted by the credit institution (the information submitted is as set out in the EBA Guidelines on ICAAP and ILAAP information collected for SREP purposes). The Central Bank of Ireland's review of the ICAAP is influential in the assessment of capital adequacy and the quantification of Pillar II

	· an overview of the methodology applied by the competent authority to review the ICAAP and ILAAP of institutions; · Information/reference to the competent authority requirements for submission of ICAAP and ILAAP related information, in particular covering what information need to be submitted; · information on whether an independent review of the ICAAP and ILAAP is required from the institution.	Capital Requirements and Pillar II Capital Guidance imposed on each credit institution. The Central Bank of Ireland's review of the ILAAP is influential in the assessment of risks to liquidity and funding. In determining the reliability of ICAAP and ILAAP capital and liquidity calculations, an assessment is performed of the following: • The extent to which the institution's board and senior management have taken responsibility for the ICAAP and ILAAP; • The extent to which the design of the ICAAP and ILAAP has been fully specified and documented; • The extent to which the ICAAP and ILAAP forms an integral part of the institution's management processes; • The extent to which the ICAAP and ILAAP is risk-based and covers all material risks to which the institution is or might be exposed; • The extent to which the ICAAP and ILAAP is regularly reviewed; • The extent to which the ICAAP and ILAAP is forward looking and integrated with the institution's strategic plans; and • The reasonableness and adequacy of measurement and assessment processes. A targeted ICAAP/ILAAP assessment focusing on Covid19-related aspects will be completed in 2020. The assessments will be simplified and focused, particularly to take account of the impact of Covid 19 on capital and liquidity planning (determining potential capital and liquidity needs). Furthermore supervisors will be seeking to understand to what extent the ICAAP and the ILAAP allow the management body/the bank to effectively manage capital and liquidity through the current crisis situation. **Investment Firms** An annual ICAAP questionnaire is reviewed by supervisors of Investment Firms. CRD IV Investment Firms, which have not been deemed "systemic", in accordance with the provisions of section 2 of the implementation notice, are not required to submit ILAAPs to the Central Bank of Ireland[1].
Overall SREP assessment and supervisory measures (Articles 102 and 104 of CRD)	Description of the approach of the competent authority to the overall SREP assessment (summary) and application of supervisory measures on the basis of the overall SREP assessment(5).	**Significant Institutions** Refer to the ECB disclosure for information on SREP for SIs here.

1

Paragraphs 8.8 -8.12 of the **Implementation of Competent Authority Options and Discretions in the European Union (Capital Requirements) Regulations 2014 and Regulation (EU) No 575/2013 December 2018 (the implemenation notice)**

	Description of how SREP outcomes are linked to the application of early intervention measures according to Article 27 of Directive 2014/59/EU and determination of conditions whether the institution can be considered failing or likely to fail according to Article 32 of that Directive(6).	**Less Significant Institutions** The Central Bank of Ireland makes an overall assessment of the capital and liquidity adequacy of the credit institutions based on the information reviewed and evaluated during the SREP. The Central Bank of Ireland strives to take adequate SREP decisions using a wide range of information coming from several building blocks. These include the credit institutions' regular reports, ICAAP/ILAAP, the institutions' risk appetite, supervisory quantifications used to verify and challenge the credit institutions' estimates, risk assessment outcomes (including risk level and risk control assessments), the outcome of stress tests, and the supervisor's overall risk priorities. The Central Bank of Ireland may consider supervisory measures to rectify or mitigate against deficiencies in controls and/or risk management as part of the SREP. Measures available include: • requiring institutions to hold additional capital or liquidity; • requiring improvements in internal controls and risk frameworks; • requiring the institution to apply a specific provisioning policy or treatment of assets in terms of own funds requirements; • restricting or limiting the business operations; and • requiring institutions to reduce the inherent risk in their activities. The outcome of the SREP analysis and any supervisory measures imposed are communicated to the credit institution in writing and the credit institution is given an opportunity to respond. Supervisory measures are both quantitative, imposing additional capital and liquidity requirements, and qualitative whereby a risk mitigation programme is imposed on a credit institution. A risk mitigation programme identifies the risk to the credit institution and imposes an action on the credit institution, which should ensure that the risk is reduced. Contravention of a Central Bank of Ireland requirement may be the subject of an administrative sanction under Part III C of the Central Bank Act 1942. Please see a link to our Enforcement Process here. As part of the SREP assessment, the supervisors will make a determination on the financial, capital and liquidity situation of the credit institution. An analysis is completed of the credit institution's own key risk indicators. A determination is made as to whether the credit institution is likely to breach its capital and liquidity requirements. If there is any indication of a deteriorating financial condition, the Central Bank may impose supervisory measures (including early intervention measures) on the credit institution. If, on these bases, an 'F' SREP score is assigned to an institution (i.e. that one or more of the BRRD FOLTF conditions are met), then the supervisor would engage with the relevant resolution authority in accordance with the applicable procedures.

		Investment Firms Please refer to the above disclosure regarding LSIs, which also broadly apply to CRD IV Investment Firms[2]. Accordingly, any references to credit institutions in that text should be read as references to CRD IV Investment Firms.

(1)Competent authorities shall disclose the criteria and methodologies used in rows 020 to 040 and in row 050 for the overall assessment. The type of information that shall be disclosed in form of an explanatory note is described in the second column.

(2)The scope of SREP to be considered both at a level of an institution and in respect of its own resources.
A competent authority shall explain the approach used to classify institutions into different categories for SREP purposes, describing the use of quantitative and qualitative criteria, and how financial stability or other overall supervisory objectives are affected by such categorisation.
A competent authority shall also explain how categorisation is put in practice for the purposes of ensuring at least a minimum engagement in SREP assessments, including the description of the frequencies for the assessment of all SREP elements for different categories of institutions.

(3)Including working tools e.g. on-site inspections and off-site examinations, qualitative and quantitative criteria, statistical data used in the assessments. Hyperlinks to any guidance on the website are recommended.

(4)Competent authorities shall also explain how the assessment of ICAAP and ILAAP is covered by the minimum engagement models applied for proportionality purposes based on SREP categories as well as how proportionality is applied for the purposes of specifying supervisory expectations to ICAAP and ILAAP, and in particular, any guidelines or minimum requirements for the ICAAP and ILAAP the competent authorities have issued.

(5)The approach competent authorities apply to arrive to the overall SREP assessment and its communication to the institutions. The overall assessment by competent authorities is based on a review of all the elements referred to in row 020 to 040, along with any other relevant information about the institution that the competent

(6)Competent authorities may also disclose the policies that guide their decisions for taking supervisory measures (within the meaning of Articles 102 and 104 of the CRD) and early intervention measures (within the meaning of Article 27 of the Bank Recovery and Resolution Directive (BRRD)) whenever their assessment of an institution identifies weaknesses or inadequacies that call for supervisory intervention. Such disclosures might include the publication of internal guidelines or other documents describing general supervisory practices. However, no disclosure is required regarding decisions on individual institutions, to respect the confidentiality principle.
Furthermore, competent authorities may provide information regarding the implications if an institution violates relevant legal provisions or does not comply with the supervisory or early intervention measures imposed based on the SREP outcomes, e.g. it shall list enforcement procedures that are in place (where applicable).

[2] Not all CRD IV Investment Firms are subject to the BRRD.