# Use of SupTech and RegTech

Presentation to Regional AMF Regional **Fintech Working Group (WG)**, 25 November 2020

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## **FSB** Financial Innovation Network

- Monitors and assesses financial innovation
- Identifies and understands implications for financial stability
- c. 70 members; biannual meetings
- Substantial outreach with the private sector



#### Background to the reports

- Published on 9 October
- Commissioned following proposal by 2020 Saudi Arabian G20 presidency
- Follows internal work by FIN on RTST in 2018
- ...and report on BigTech firms' global activities in December 2019
- Extensive surveys and industry engagement...
  - ...and meetings with BigTech firms with significant EMDE business



# Use of SupTech and RegTech

• SupTech = innovations to help authorities improve supervision

 RegTech = innovations by institutions to help meet regulatory requirements



The Use of Supervisory and Regulatory Technology by Authorities and Regulated Institutions

Market developments and financial stability implications





9 October 2020



The **digitisation** of reporting and regulatory data could **heighten efficiency** while **increasing operational resilience** for both authorities and market participants.

**Increased automation** could reduce both **operational risks** and **costs** of additional regulatory compliance and supervision.



With the **increased volume** and **granularity** of available data (both traditional and non-traditional) authorities may become more **agile** in the development of their supervisory frameworks.



SupTech & RegTech tools may increase the **accuracy**, **comprehensiveness** and **timeliness** of risk management **without** commensurate increases in headcount.



# Supply drivers

Increased breadth of new analytical methods (e.g. AI) may allow for **more rapid processing** of regulatory and supervisory submissions (both structured and unstructured), assisting authorities in **identifying noncompliance.** 



The development of systems providing a greater degree of interoperability (e.g. API, microservices) may enable higher rates of adoption for SupTech and RegTech.

Technological infrastructure developments (Cloud based services) have **reduced the cost** and **increased the available capacity** for handling large datasets, which may in turn allow for a **greater deployment** of SupTech and RegTech processes.

With the **availability** of both more **structured** and **unstructured** data along with relevant technologies, authorities may **increase their own adoption** of SupTech and RegTech practices.





## Benefits, Challenges, Risks

**Benefits** 



SupTech may allow for **integration of additional** structured and unstructured data sources making analysis **richer**, while also **identifying patterns** in the data that may not be apparent to **human review**.

The ongoing digitalisation of data may improve the **efficiency and effectiveness of operational procedures**, while the automation of processes may **reduce IT and staffing costs**, in particular those related to fraud detection, reporting and risk management.



More **capital-efficient decision making** (e.g. RegTech for capital allocation for trading; compliance with pre-set credit or capital thresholds) may be possible allowing for **real-time settlement**.

SupTech may leverage AI and ML models, which could **improve surveillance** and **assessment** of systemic risks in **real-time** and through **forecasting**.



Improved **comprehensibility**, **interoperability** and **visualisation** of data by reducing its complexity and transforming it into **meaningful indicators**.



## Benefits, Challenges, Risks

Challenges

Rapid technological developments in SupTech and Regtech would require authorities and financial institutions to take a strategic view on the impact of new technologies in financial supervision.



**Data quality and completeness** may be a challenge as authorities and financial institutions increasingly turn to non-traditional information sources (e.g. social media) to **fill gaps** or provide a **richer context** for their own data.

Increased adoption of SupTech and RegTech tools could put authorities and financial institutions in **direct competition for data science and engineering talent** with companies in other sectors.



SupTech and RegTech applications may be less effective if **data localisation measures** (and related data aggregation and operational risk management challenges) are not **reviewed** and **adjusted**.



## Benefits, Challenges, Risks

#### Risks



**Increased cyber risk** through technological interconnectedness between financial institutions and external parties. New technologies may establish new 3<sup>rd</sup> party risks related to **Cloud based** services and **algorithm** providers.



Any **coding errors** in SupTech **underlying algorithms** may present supervisors with **spurious** rather than meaningful correlations, thus increasing **reputational risk** for authorities.



Increased risk of **regulatory arbitrage** if financial institutions learn how particular SupTech/RegTech applications, alerts or algorithms used by authorities are **calibrated** and in turn seek to **exploit** them.



Potential increase in **undetected breaches** of market integrity standards or criminal activities due to **over-reliance on technology** and **automation of risk monitoring** processes.



# SupTech strategy

Survey evidence – most authorities have a SupTech strategy **in place** or are in the process of **developing** one. **A third** of respondents had a **RegTech** strategy in place and the **majority** indicated that regulated entities in their jurisdiction were using RegTech tools.

**Considerations** for successful introduction of SupTech strategies:

- Senior management **buy-in** support of the benefits, while realizing any limitations and risks
- Engagement with frontline supervisors and end-users of SupTech tools early dialogue and cooperation to ensure successful implementation and adoption

Approximately half of respondents indicated that they have a formal venue or platform in place to support testing of SupTech tools and activities. Such environments may encourage staff to engage with or lead innovative projects.

**Regulatory sandboxes** or **innovation hubs** may provide authorities with broad mandates to **promote** innovation and **engage** with FinTech firms.





# **Resource requirements**

To stay abreast of technological developments and be successful in the implementation of SupTech strategies, authorities may pursue a range of staff related actions:



Step up recruitment of highly skilled and technologically sophisticated employees



**QOO** Improve retention of digitally skilled professionals who already have specific domain knowledge of authorities' unique needs, their regulatory frameworks and technological capacities.



Develop novel approaches to training and knowledge sharing across departments.



#### Data collection and storage

#### **Collection:**

With **increased automation** and through adoption of **innovative protocols and technologies**, financial institutions could significantly **reduce compliance costs** and generate **operational efficiency** in reporting processes.

Another **key element** to facilitate the development of SupTech is the **standardisation** of data reporting **across** jurisdictions and sectors of the economy. To enable this, authorities and market participants need to agree a **common set of data definitions** and relevant **data models**.

#### Storage:

With the advent of **Cloud based services**, most authorities are considering the possibility to adopt some Cloud solutions in order to take advantage of their inherent **economies of scale**, **greater efficiency** and **operational resilience** compared to more traditional approaches to data storage.







#### Data processing and analysis

#### Management and processing:

A fifth of Survey respondents indicated that their data is spread across the organisation, while a half organise their data only to a limited extent. Remaining authorities are almost evenly split between a data lake model and a federated database system.

SupTech applications are still a small portion of the **data validation** methods deployed by authorities, with a quarter reporting manual checks and more than half relying on static automated checks.

#### Analysis and visualization tools:

Most authorities have a strong **historical reliance on MS Excel** for data analysis, except for a few that indicate as much reliance on Python and R as Excel.

In terms of the nature of **analytical outputs**, the majority of analytics is **descriptive** and **diagnostic**, and as such are generally **backward looking**.





**COVID-19 Use Cases** 

The **increased pressure** on authorities to cope with large volumes of data while working remotely has resulted in a number of **COVID-19 specific applications** aimed at improving the **timeliness** and **accuracy** of critical information, while also providing supevisors with critical perspectives.

**NLP for continuous monitoring and web searches** – a Fed Reserve Bank tool historically used for **reading large amounts** of BSA/AML documentation and **identifying emerging** trends was adapted by expanding its lexicon to support examiners in the review of documents submitted by firms during the COVID-19 crisis.

**Improved credit risk forecasting** – the ECB is currently looking into **combining sectoral loan** level data (currently only used for monetary policy and financial stability purposes) with prudential information to allow supervisors to drill down into specific exposure types, as well as viewing risk trends and clusters of risks across sectors prone to COVID-related shocks.







## COVID-19 Use Cases continued



Sentiment analysis – another tool the ECB is currently also exploring is seeking to assess the reputational risk of a financial institution by looking at news on a range of topics and multiple different languages. The dashboard will seek to provide an easily readable and customizable interface for ad-hoc analysis of the public sentiment and complement the supervisory review and evaluation process (SREP) with relevant pieces of information.



**Policy response tracker** – the BOE has created a dashboard where supervisors can see **at a glance** the latest and most recent **policy rate** and **QE decisions**, as well as **press releases** and **fiscal actions** in more than 50 countries. The dashboard informs **supervisory perspectives** on the different types and level of **support** a global firm may have available in response to the economic downturn from the pandemic.



**SAS-VA Covid-19 dashboard** – the DNB are developing an **interactive** dashboard to provide **insight** for supervisors on COVID-19 related risks. Supervisors would be able to have **different data views** (e.g. benchmarking, trends, single bank).



# Financial stability

RegTech and SupTech promise to add **new means to improve** (micro- and macro-prudential) supervision, oversight, and enforcement by authorities, and reporting and compliance by financial institutions, thereby potentially **strengthening the resilience** of the financial system.

To the extent that **automation** of regulatory and compliance functions can **reduce scope for human error**, while at the same time **increasing** the potential for **real-time** monitoring and information processing, RegTech and SupTech may be **positive developments** from a financial stability perspective.

However, a reason to continue to monitor developments closely is the **possibility** that regulated entities could become adept at **concealing** certain **actions** or **risks** ('gaming' the system).



Recommendations

Authorities should consider developing SupTech strategy that **meets** their **unique objectives**, has the **buy-in senior management** and the **engagement** with those involved in **daily supervision**.

Authorities may seek to establish a **talent** strategy for **attracting** and **retaining** the necessary talent base with the right **digital skillsets**, as well as consider actively engaging and seeking **collaborations** with a range of other authorities, market participants, academia, technology providers and international organisations.

There is **no one size fits all** as to whether to build SupTech tools **in-house** or invest in a **third-party** solution, so authorities may wish to weigh the **operational trade-offs** involved in the two approaches and find the right mix.







## Recommendations continued

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There are significant **untapped opportunities** for both authorities and market participants in the area of **data collection**. Going forward, authorities will move away from legacy systems and may consider **adoption of APIs** or **micro service interfaces** allowing market participants to **programmatically submit** their data.



Standard setters and authorities may wish to consider evaluating the scope for **common data standards and taxonomies** for relevant regulatory areas, including the potential for **international collaboration**, in order for reporting solutions to be made more scalable and interoperable.

Authorities and market participants may wish to **adopt** an environment that **encourages 'fast fails'** and **dynamic idea sharing**. Authorities may **encourage open dialogues** that will lay the **foundation** for the **future** regulatory landscape.



# Time for questions









