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Banking System

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[Bank for International Settlements](#)

## BIS: Implementation of the Principles for Effective Risk Data Aggregation and Risk Reporting

- The Basel Committee's BCBS 239 Principles remain a **critical framework for enhancing banks' risk data aggregation (RDA) and risk reporting capabilities**. Originally targeting systemically important banks, their relevance has expanded in response to a **rapidly evolving financial, technological, and regulatory environment**.
- Banks continue to face **persistent challenges in implementing** the Principles, particularly due to operational complexity, technological shifts and the growing demand for timely and accurate risk data. Key industry issues include data lineage, governance structures, cross-border consistency and integration of emerging technologies. Mergers, acquisitions and new product lines further complicate risk data practices, often requiring structural adjustments.
- Governance remains foundational.** Boards are expected to maintain strategic oversight, while management handles daily RDA activities. A strong data-driven culture and senior management engagement are essential to overcoming internal resistance and

fragmented responsibilities. Although some banks are embedding RDA within broader enterprise-wide data governance frameworks, alignment remains uneven across institutions.

- Data lineage is a particularly difficult area** due to legacy systems and distributed data estates. The resource-intensive nature of tracking data from origin to output complicates traceability, though investments in automation can yield efficiency gains. Banks also struggle to deliver accurate, ad-hoc risk reports, especially under stress scenarios. Testing these capabilities in stable periods is viewed as a good practice.
- Cross-border institutions face jurisdictional inconsistencies**, making global alignment difficult. Standardised group-wide frameworks are often employed to manage regulatory divergence across subsidiaries. Meanwhile, the use of emerging technologies - such as AI and automation - is promising but nascent, with data quality concerns limiting broader deployment.