

Deloitte Banking Alert

August 2025

SRB publishes Operational Guidance for Banks on Resolvability Self-Assessment

On 7 August 2025, the Single Resolution Board (SRB) published its Operational Guidance for Banks on Resolvability Self-Assessment, accompanied by:

- Annex II – Self-Assessment Template
- SRB Feedback Statement from the public consultation held between 3 December 2024 and 7 February 2025.

This is a key step in delivering the SRM Vision 2028, ensuring a consistent, comparable, and transparent approach to resolvability self-assessments. The guidance reflects lessons from past crises and integrates industry feedback to create a proportionate and streamlined process.

Key improvements introduced

1. Standardised and simplified self-assessment template, reducing complexity and promoting comparability between institutions

The introduction of a single, standardised template for resolvability self-assessment ensures that all institutions follow a uniform reporting format. This significantly reduces the complexity previously associated with custom formats and allows the SRB to conduct more consistent and comparable analyses across the EU banking sector. The simplification of the template also streamlines the internal preparation process for banks, as data requirements, structure, and definitions are now clearly laid out, minimising interpretation differences and reducing the risk of inconsistent submissions.

2. 20% reduction in resolvability capabilities to be assessed, focusing efforts on core and high-impact capabilities

By reducing the number of capabilities that need to be assessed by approximately 20%, the SRB is focusing attention on the elements that are most critical for effective resolution planning. This prioritisation helps banks allocate resources more efficiently, targeting the capabilities that have the greatest impact on resolvability outcomes. The reduced scope also lowers the compliance

burden, while maintaining a strong focus on resilience, operational continuity, and the ability to execute a resolution strategy effectively in stress situations.

3. Biennial reporting requirement instead of annual submissions, with a less granular testing structure for resolvability capabilities.

The move from annual to biennial reporting offers banks more time to implement meaningful improvements between self-assessments, leading to higher-quality submissions. The less granular testing structure reduces the amount of detailed evidence required for each capability, without compromising the SRB's ability to assess readiness. This change strikes a balance between maintaining regulatory oversight and ensuring that the reporting process is proportionate to the risks and benefits involved, ultimately reducing administrative workload for both institutions and the SRB.

Practical implications for banks

The new framework will require institutions to:

1. Document their progress in meeting the Expectations for Banks (EfB)

Banks must systematically assess and record how they meet the SRB's EfB across all relevant resolvability dimensions, such as operational continuity, liquidity in resolution, separability, and loss-absorbing capacity. This requires maintaining an evidence base that demonstrates both compliance and continuous improvement. Institutions will need to ensure that the documentation is complete, aligned with the standardised template, and ready for SRB review.

2. Test the effectiveness of their resolvability capabilities in practice

The framework goes beyond theoretical compliance by requiring banks to verify that their resolution capabilities can function effectively under realistic stress scenarios. This may involve running operational tests, simulations, or dry-runs of resolution actions, as well as identifying and addressing capability gaps. The less granular testing structure will allow banks to focus resources on proving the readiness of the most critical functions and capabilities.

3. Prepare and submit the first report under the new regime by 31 January 2026, reflecting the situation as at 31 December 2025

The first biennial self-assessment, reflecting the position as at 31 December 2025, must be submitted to the SRB by the end of January 2026. This deadline gives institutions a short implementation window to adapt processes, update internal governance, and collect the necessary data in line with the new template. Early preparation will be key to ensuring a high-quality, complete submission that meets SRB expectations.

How can Deloitte help?

Deloitte can support financial institutions in effectively implementing the new SRB guidance through:

- Regulatory gap and impact assessment – analysing current self-assessment processes against the new SRB template and requirements;
- Policy and governance framework updates – aligning internal policies, governance structures, and documentation with SRB expectations;
- Data and reporting adjustments – support in mapping, collecting, and structuring the required information to populate the new template efficiently;
- Process optimisation and testing design – streamlining capability testing in line with the less granular SRB approach;
- Training and capacity building – delivering targeted training for resolution planning teams and senior management on the new methodology.

For further questions regarding the aspects mentioned in this alert, please don't hesitate to contact us:



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