
EBA Regular Use

Decision of the European Banking Authority EBA/DC/530

of 10 April 2024

concerning the establishment of an Information and Data Committee (IDC) and the appointment of a Chief Data Officer (CDO) within the EBA

The Executive Director

Having regard to Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC¹, in particular Article 53(3) thereof,

Whereas:

- (1) Decision EBA/DC/2021/386, concerning the reorganisation of the Economic Analysis and Statistics Department, established a new Data department within the EBA, while Decision EBA/DC/2021/387, concerning the internal reorganisation, renamed that Department into 'Data Analytics, Reporting and Transparency' ('DART') and established its composition. DART is comprised of the Statistics Unit and of the Reporting and Transparency Unit. Those adjustments to the EBA's internal organisation were made, among other reasons, in order '*to reflect the EBA's multi-annual strategic priorities, in particular to increase synergies in relation to work on statistics and reporting [...]*' as referred to with identical language in the first recital of both of those Decisions, thus reflecting the increasing centrality of data within the EBA.
- (2) This Decision should cover all the EBA's information in any form.
- (3) Data is in the core of what the EBA does and the EBA is committed to its role as data hub for the EU financial sector and to providing service to all stakeholders as appropriate for its role and possible within its powers. The EBA data strategy² envisages, among its other components, a governance framework for its effective and efficient implementation. That governance

1. OJ L331, 15.12.2010, p. 12.

² EBA DART/STATISTICS of 30 July 2021 <https://intranet.eba.europa.eu/InHouseServices/Pages/Data%20Strategy.aspx>

framework is based on two main internal roles among others. Firstly, a Committee, which is envisaged to take the strategic decisions relating to the EBA Data Strategy and to approve the detailed procedures as well as to specify the functioning of other roles in the context of the EBA Data Strategy; and secondly, a Chief Data Officer ('CDO'), who is envisaged to lead the day-to-day implementation of the EBA Data Strategy and further implement the details of the Strategy as defined by the relevant Committee and 'apply' the procedures defined by it. Nevertheless, given DART's role as the EBA's data department, and given that the Director of DART is entrusted with the day-to-day application and implementation of the EBA Data Strategy, it is necessary to clarify this role.

- (4) The governance arrangements for taking the strategic decisions relating to the EBA Data Strategy will benefit from receiving input from all EBA relevant Units, given the 'horizontal' nature of data that cuts across all areas within the EBA's scope of action. In light of the above, it is necessary to establish a new Information and Data Committee (IDC), to assume the tasks of the existing EBA Information Management Steering Committee (IMSC), in addition to getting new ones relating, in particular, to the EBA's data assets in order to centralise in one EBA committee the coordination of any work relating to the EBA's information. This will ensure a consistent and holistic approach relating to all the EBA's information.
- (5) The membership of the IDC should be established to allow both consistency of outcomes between work that relates to data assets in particular and other EBA information, as well as the use of specialised input and expertise. As a result, the IDC should be made up of the Executive Director, the CDO and the Directors from all EBA departments as this would allow a coordinated decision-making at the highest management level. In addition, the IDC should also be made up of the Heads of Governance and External Affairs (GEA) and Legal and Compliance (LCU) Units as well as the Data Protection Officer (DPO), if different from those two Heads, as observers. Further, it should be made possible for the Chair or Vice Chair to invite as observers the Heads of other Units of the EBA on an *ad hoc* basis, depending on the agenda and reflecting the specialised expertise needed in each case.
- (6) Given the IDC's work will relate to both data assets and other EBA information, it is appropriate that the CDO, with support from DART resources, and the GEA Unit share the tasks of providing secretarial and coordination support and preparing the work of the IDC, with regard to data assets and other EBA information, respectively, and with appropriate coordination and consultation between them.

Has decided as follows:

Chapter 1 – Information and Data Committee (IDC)

Article 1 – Establishment and composition

1. An Information and Data Committee (IDC) shall be set up at the EBA.
2. The IDC shall be composed of:

- (a) the following members:
 - (i) the Executive Director, who shall act as the IDC Chair;
 - (ii) the Chief Data Officer (CDO), who shall act as the IDC Vice-Chair and can deputise for the Chair;
 - (iii) the Directors of Department of the EBA, who can be represented by their Heads of Unit as appropriate;
- (b) the following observers:
 - (i) the Heads of the GEA and Legal and Compliance Units and the Data Protection Officer (DPO) if the DPO is a different person from either of the Heads of GEA and LCU;
 - (ii) the Heads of any other Units as may be considered necessary by the Chair or Vice-Chair on an *ad hoc* basis.

Article 2 – Tasks

The IDC shall examine all issues relating to the EBA's information and data assets and, in particular, it shall:

- (a) review the EBA records management policy as well as any changes thereto before submitting them for approval to the Executive Director;
- (b) approve any necessary implementing rules or internal processes and procedures concerning the EBA records management policy, as well as any changes thereto;
- (c) assign roles to staff members, as appropriate, in the interest of compliance with the EBA records management policy and related processes and procedures;
- (d) evaluate the need of any new controls necessary to put in place in order to meet regulatory, legal, risk and operational requirements and submit proposals and suggestions for an ED Decision;
- (e) decide and review, as appropriate, the strategic and 'horizontal' aspects of executing the EBA data strategy, including: the release planning of reporting requirements; the initiation of projects to maintain and enhance the EBA's infrastructure for the collection, sourcing, analysis and publication of data; the EBA's priorities and position in the light of EU and other initiatives in relation to data;
- (f) decide and review, as appropriate, any updates to the EBA Data Strategy, including deciding, reviewing and implementing the roadmap of investments and transformations; monitor EBA Data Strategy risks as well as ensure the continuous alignment with the EBA's Single Programming Document (SPD) and new EBA mandates;

- (g) develop and review, as appropriate, all 'data and analytics' ('D&A') standards and policies, procedures, guidance and standards related to data, including on ad hoc data collections, data quality and the appropriate use of D&A resources and capabilities within EBA;
- (h) establish and review, as appropriate, the Data Governance Structures (roles, responsibilities) envisaged in the EBA Data Strategy;
- (i) carry out the tasks conferred upon the IDC in relation to EBA *ad hoc* collections of information.

Article 3 - Meetings and decision-making

1. The IDC shall convene at least twice per year.
2. The IDC shall preferably decide by consensus of its members present. Where a consensus cannot be reached, the IDC Chair shall decide.
3. The rules relating to the IDC meetings, minutes and transparency, details of secretarial support and coordination and the possibility of establishing technical working groups under its auspices shall be adopted by the IDC based on a joint proposal from the CDO and the Head of GEA.

Chapter 2 - Chief Data Officer

Article 4 – Designation

The Director of the Data Analytics Reporting and Transparency Department ('DART') shall be the EBA's Chief Data Officer *ex officio*.

Article 5 – Tasks and duties

1. The CDO shall be responsible for:
 - (a) Vice-chairing the IDC and ensuring that DART provides the day-to-day management of, and secretarial and coordination support to the IDC for matters relating to data assets and for contributing to GEA's activities on the day-to-day management of, and secretarial and coordination support to, the IDC for matters relating to other EBA information;
 - (b) drafting IDC decisions for matters relating to data assets, and contributing to GEA's drafting of IDC decisions relating to other EBA information;
 - (c) coordinating implementation across the EBA of IDC decisions relating to data assets and the delivery of the EBA data strategy; and contributing to GEA's activities in coordinating implementation across the EBA of IDC decisions relating to other EBA information;
 - (d) carrying out the tasks conferred upon the CDO in relation to the EBA's information classification policy;

- (e) carrying out the tasks conferred upon the CDO in relation to *ad hoc* collections of information.
2. The CDO shall ensure that the CDO tasks are presented to the IDC on a regular basis as deemed necessary and at least semi-annually in relation to the fulfilment of the CDO tasks.

Chapter 3 - Final Provisions

Article 6 – Cease of activities of the Information Management Steering Committee

The Information Management Steering Committee is replaced by the IDC.

Article 7 - Entry into force

This Decision shall enter into force immediately.

Done at Paris,

François-Louis Michaud
Executive Director