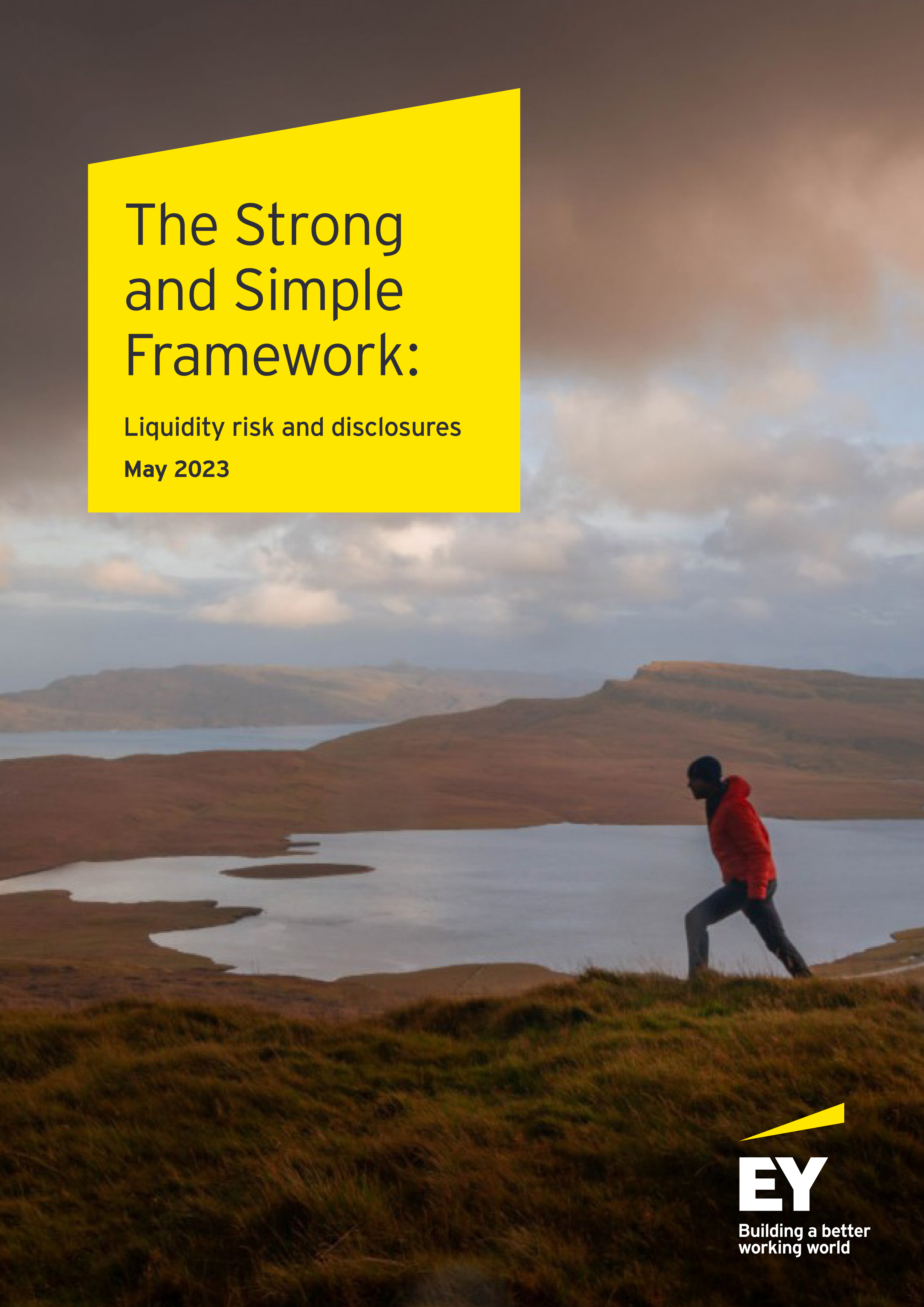


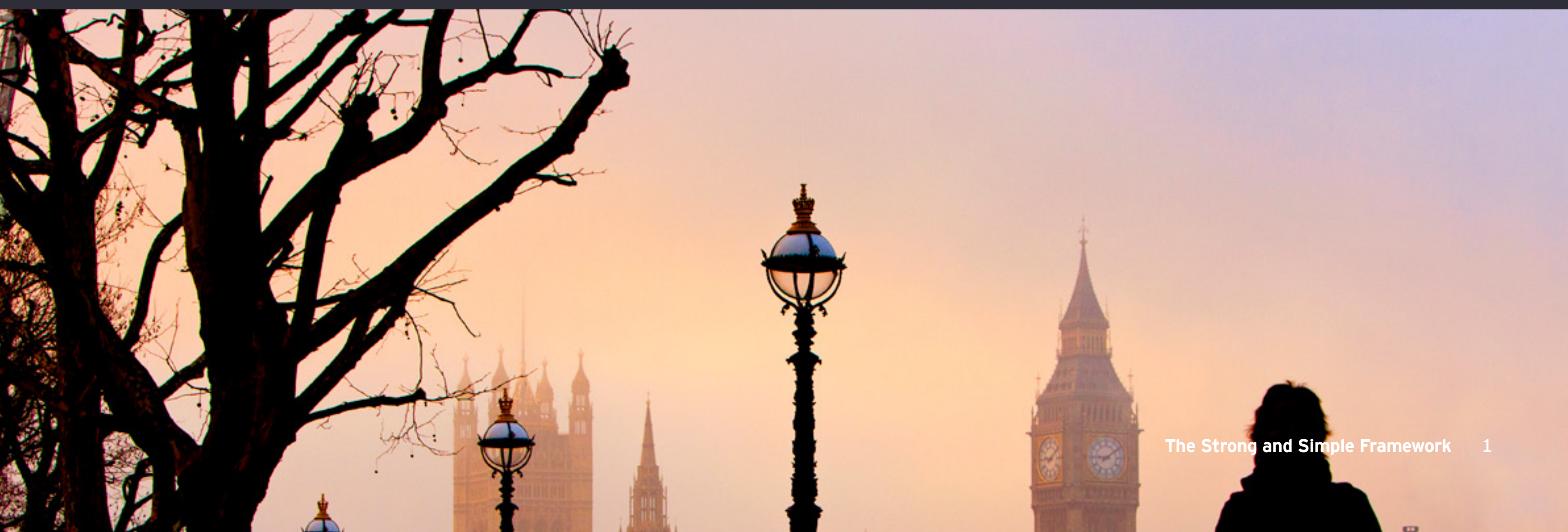
The Strong and Simple Framework:

Liquidity risk and disclosures

May 2023

Building a better working world

Contents



Executive summary

The Prudential Regulation Authority (PRA) recently published a consultation paper **CP4/23 – The Strong and Simple Framework: liquidity and disclosure requirements for Simpler-regime firms**, aimed at promoting growth and competitiveness in the banking sector and encouraging competition between smaller firms and larger banks[1]. The proposals in the consultation could materially reduce the burden on non-systemic banks and building societies that qualify for the simpler regime. This consultation is phase one of the new framework with a second consultation paper (CP), focussed on changes in capital requirements, due to be published in H1 2024. The deadline for responses to the phase one proposals is 30 May 2023, but the deadline for the final implementation of CP4/23 is estimated for H2 2024. This delays the timeline for a final decision on joining the regime until after firms are made aware of the proposed changes in capital requirements. However, it should be noted that the PRA has stated that eligible firms will have the option to become simpler-regime firms at least six months before the implementation date.

Important changes proposed in CP4/23 could provide an opportunity for non-systemic firms in the UK to reduce the complexity and costs of regulatory compliance. This issue is particularly timely given that liquidity risk is currently at the forefront of regulatory thinking after the recent run on Silicon Valley Bank (SVB) in the US and contagion to its UK subsidiary (see below).

It is clear that firms will be best placed to decide whether they want to adopt the simpler-regime once they see the proposals for capital in H1 2024. However, given this heightened regulatory attention and the opportunity to reduce the complexity and costs of regulatory compliance, lenders in scope should be assessing the potential benefits for liquidity requirements now and fully engaging with the PRA consultation process. Below we will explore the key changes and what they mean for lenders.

The impact of recent banking failures

Many factors led to the recent run on SVB (liquidity risk, interest rate risk in the banking book, funding concentration risk, etc.), but lack of confidence in the US parent was the main contributor to contagion in the UK. However, technology sector funding concentration risk was one common risk factor in both entities. This may bring more attention to funding concentration risk with a greater focus on sector and geographical concentration as well as single-name concentration risk.

It is important to note that SVB (with a balance sheet below $250bn and low levels of short-term wholesale funding) was not required by the US Authorities to meet liquidity coverage ratio (LCR) or net stable funding ratio (NSFR) requirements. In the UK, the balance sheet threshold (below £20bn) for inclusion in the UK's simpler-regime is significantly lower.

This recent turmoil in the banking sector may lead the PRA to take a more cautious approach to these proposed liquidity and capital regulatory requirements changes (see recent discussions at the **Treasury Committee**).[2]

[1] **CP4/23 – The Strong and Simple Framework: Liquidity and Disclosure requirements for Simpler-regime Firms**," Bank of England website, **https://edu.bankofengland.co.uk/prudential-regulation/publication/2023/february/strong-and-simple-framework#:~:text=CP4%2F23%20-%20The%20Strong%20and%20Simple%20Framework%3A%20Liquidity,Consultation%20Paper%204%2F23%20Published%20on%2027%20February%202023**, accessed 19 April 2023

[2] "Treasury Committee Oral evidence: Silicon Valley Bank UK, HC 1226 Tuesday 28 March 2023", UK Parliament website, **https://committees.parliament.uk/oralevidence/12933/pdf/**, accessed on 27 April 2023.

Phase one: Lighter-touch liquidity and disclosure requirements for smaller firms

Small banks and building societies, who are mostly reliant on retail deposits, often face less complexity and risks than larger banks, who get funding from a wide mix of retail, commercial and wholesale sources.

Retail funding comes from a range of products (e.g., current accounts, notice accounts, term deposits) and has a range for stressed outflow weights in LCR depending on the stability of the deposits. However, all retail stressed outflow weights are relatively low (ranging from 5% to 20%) compared with non-operational wholesale funding (40% or 100%), having far less impact on LCR. The lowest outflow weight for stable retail deposits (5%) is driven by Financial Services Compensation Scheme (FSCS) coverage for customers with an established relationship or a transactional account. There is a similar difference in NSFR impact with much lower available stable funding weights (less than one year) for wholesale (ranging from 0-50% depending on the type of counterparty) than retail funding (90% or 95%).

Whilst liquidity risks of smaller lenders may not necessarily be lower, they are certainly easier to understand and manage (i.e., less Pillar 2 liquidity risks, with most captured within Pillar 1 of LCR) and do not create the same systemic risk as larger firms that are more reliant on wholesale funding. All these differences are why the PRA is keen to reduce the complexity and costs of regulatory compliance for simpler banks and building societies. Below are the five proposals in the latest CP that look to reduce the burden for simpler lenders:

1. **NSFR requirements:** simpler-regime firms with more than 50% of funding from retail deposits for the last four quarters will no longer need to report NSFR. Going forward, NSFR will only be applied to firms with higher stable funding risk measured by a new retail deposit ratio (RDR) metric with a 50% threshold.
2. **Pillar 2 liquidity requirements:** Pillar 2 liquidity add-ons will be removed for most firms, with only those with higher material idiosyncratic risk continuing to receive them. However, all firms will still be required to do a Pillar 2 self-assessment of any material risks not captured within LCR (Pillar 1) as part of their internal stress scenario and internal liquidity adequacy assessment process (ILAAP).
3. **A streamlined ILAAP template document.**
4. **Liquidity reporting:** Removing certain liquidity reporting templates (four of the five additional liquidity monitoring metrics (ALMM) returns).
5. **Reduced Pillar 3 disclosure requirements:** Streamlining requirements for firms with listed financial instruments; removing them for firms without listed financial instruments.

The proposed changes to lower costs and increase time and resources for smaller firms were partially driven by growth and competitiveness. The PRA hoped this could lead to the growth of smaller firms and competition with larger banks.

It should also be noted that another CP (CP5/23 – Remuneration: Enhancing proportionality for small firms[3]) was published covering simplifying remuneration requirements for small banks and building societies to increase proportionality. This included amending the definitions of a 'small CRR firm' and 'small third-country CRR firm'; disapplying the rules on malus, clawback and buyouts to small firms; and making disclosure requirements clearer for all proportionality rules by making amendments to SS2/17.

Firms meeting the simpler-regime criteria (as well as some other small firms) would be in scope for these proposals. The criteria are less than £4bn in total assets by a three-year average or an average of £4bn–£20bn, plus meeting all other simpler-regime criteria apart from the UK assets threshold, no IRB and certain requirements that relate to the parent and UK consolidation group. The firm must also not be part of a group containing another firm which:

1. Is subject to the remuneration part individually.
2. Exceeds £20bn in average total assets on an individual, consolidated or sub-consolidated basis.

[3] "CP5/23 – Remuneration: Enhancing proportionality for small firms", Bank of England website, **https://www.bankofengland.co.uk/prudential-regulation/publication/2023/february/remuneration-enhancing-proportionality-for-small-firms**, accessed 19 April 2023

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Net stable funding ratio (NSFR) requirements

The proposed change removes NSFR for firms with mostly stable retail funding. Removing the NSFR will allow smaller firms to reduce the costs of liquidity and funding management and reporting. It will also allow firms to focus more on the funding metrics relevant to their business model. In some cases, there is still value in measuring and monitoring NSFR-like metrics.

NSFR was introduced on 1 January 2022, with the primary goal being for firms to maintain a stable funding profile with less reliance on short-term wholesale funding.

Due to the structure of most small non-systemic banks and building societies being highly retail funded and less reliant on short-term wholesale funding, the PRA is proposing that the firms be considered for disapplication of NSFR, which would now only apply to firms with higher stable funding risk. This removes the burden of reporting NSFR for firms with a stable retail funding base.

Retail funding has only two available stable funding (ASF) weights, both of which have a positive impact on NSFR showing the stability of retail funding. The largest weight is driven by FSCS coverage for customers with an established relationship or a transactional account (95% weight if less than one year). All other retail customers that do not meet this criterion have a 90% weight if less than one year. Non-retail funding is as low as 0% for central banks and financial institutions if less than six months (50% for six to twelve months) and 50% for non-financial customers if less than one year (e.g., corporates, public sector entities, multilateral development banks, deposit brokers). Clearly, retail funding is a much larger contributor to the NSFR ratio than wholesale funding.

Whether to remove NSFR will be decided based on a new RDR metric that will replace NSFR. If retail funding comprises more than 50% of total funding (excluding capital) for the last four quarters, NSFR is no longer required, along with the removal of reporting requirements. This four-quarter average methodology aligns with current NSFR reporting and will prevent too much variation in firms' requirements. New firms can also apply for a modification removing NSFR requirements until they have four quarters of historical data for measuring the RDR. If a firm falls below the threshold for the four-quarter average, there is a 12-month timeline before NSFR needs to be reimplemented. This ratio considers exposure to individual retail accounts and small and medium enterprises (SMEs) that are retail eligible (less than £880k of deposits and less than £50mn annual turnover) under article 411(2) of the liquidity (CRR) section of the PRA Rulebook. No replacement reporting will be required for the RDR as data can be utilised from the one remaining ALMM return (C68, Concentration of funding by product type). However, an internal framework for monitoring the 50% threshold may have minor costs.

The reporting of retail accounts received through deposit aggregators should also be considered. The policy is not clear on this, but the Dear CEO Letter: Obtaining Deposits via Deposit Aggregators states, "While the deposits from the Deposit Aggregator may come from a diversified client base, the flow of deposits sourced from a Deposit Aggregator may be correlated, as there is a single commercial relationship between the Deposit Aggregator and the Deposit-taker. Firms should factor this into their management of liquidity risk and funding needs"[4]. This essentially means that the deposits should be reported as coming from a deposit broker, as the broker has the power to transfer all deposits to another bank. As these deposits are not treated as retail in LCR or NSFR, there would be a high burden of proof needed for them to be included in the RDR calculation.

The proposed change will improve proportionality for retail deposit takers with low reliance on wholesale funding that currently have large NSFR ratios. Removing the NSFR will allow smaller firms to reduce the costs of liquidity and funding management, and reporting. It will also allow firms to focus more on internal funding metrics more relevant to their business models. In some cases, there may still be value in measuring and monitoring NSFR-like metrics if the firm currently has a low NSFR surplus.

The PRA has nevertheless proposed amended wording to the SS24/15 stating that it can use its powers to require a firm to implement NSFR if it believes the firm's funding position has shorter-term risks (e.g., if a firm's short-term wholesale funding is close to 50%, the RDR threshold will not be the only thing that decides whether NSFR is required).

In January 2022, the simplified NSFR was implemented to enhance proportionality. This was a simpler version of the report that small and non-complex firms could choose to use. The PRA proposes to remove it from the liquidity (CRR) section of the PRA Rulebook as the Strong and Simple Regime would essentially supersede it.

[4] "**Dear CEO Letter: obtaining deposits via deposit aggregators**", FCA website, **Dear CEO Letter: Obtaining Deposits via Deposit Aggregators (fca.org.uk)**, accessed 19 April 2023

Pillar 2 liquidity requirements

Under the proposed changes, Pillar 2 liquidity add-ons will only be applied to simpler-regime firms with higher material idiosyncratic risk. However, in line with the overall liquidity adequacy rule (OLAR), firms are still required to do their own Pillar 2 assessments, including risks not captured by LCR (Pillar 1) within their internal stress scenarios.

This area will be even more important once firms qualify for the simpler regime to monitor that an adequate buffer is still in place to cover all liquidity risks in times of stress. If the PRA no longer assesses Pillar 2 risks, this adds to the importance of the firm's self-assessment and whatever metric is in place tracking the internal stress scenario with a board risk appetite and early warning indicators as it will most likely become the binding constraint.

In the interim period, as firms consider the pros and cons of the regime, they should be particularly attentive to their Pillar 2 risks and the importance of deciding how they wish these risks to be measured and monitored in the future.

The objective of the Pillar 2 add-on is to provide an additional buffer for risks that are not captured as part of the LCR (Pillar 1).

Many of the Pillar 2 risks are not material to less-complex firms that do not issue their own debt instruments, have fewer derivatives on the balance sheet and have no prime brokerage business. The main likely add-on for these firms has been intraday.

The current proposal would marginally reduce costs for smaller firms as the Pillar 2 templates would not need to be completed as part of the Liquidity Supervisory Review and Evaluation Process (L-SREP). It would also be unlikely to have a significant effect on risk management given how immaterial most Pillar 2 risks are to their less complex business models. Nonetheless, firms are still required to do a self-assessment of all liquidity risks, including Pillar 2, in line with OLAR.

The consultation does not provide specific parameters regarding the definition of materiality. However, the PRA states that it is expected that add-ons would not apply to most firms that qualify for the simpler regimes.

New ILAAP structure

The PRA has proposed an amended ILAAP template in Appendix 3 of the consultation (Draft amendments to SS24/15 – Appendix 2)[5] with many parts of the Liquidity Risk Assessment and Inherent Funding Risk Assessment sections merged with stress testing. The overall order of the template has also been changed with much more emphasis on stress testing. The PRA gives useful guidance on how the simpler-regime firms can approach their risk assessment in the context of their business model. It is also made clear that the risk drivers only need to be addressed in the paper if they are considered material to the firm.

Whilst adjusting to the new ILAAP structure may be costly initially, in the long run, it seems far more efficient with less time and resources spent in areas of the document that are immaterial to the business model of these firms. This will give the firms more time to focus on the risks that are more relevant to them. The new template also clarifies what is expected to be included in each section. Whilst all the firms that qualify would be able to use the new template, switching over from the old template is not mandatory.

There is a more detailed comparison of the structures in a table on the next page, but to summarise:

- The new structure has merged many of the risk management assessment sub-sections into the stress testing section forming four new sub-sections to avoid duplication of work across the report. Parts of liquidity risk assessment have also been merged with stress testing, and parts of inherent funding risk assessment have been removed.
- It is clearer how to report the risk drivers, and unlike the old structure, immaterial risks do not need to be mentioned.

[5] "Draft amendments to SS24/15 – The PRA's approach to supervising liquidity and funding risk", Bank of England website, **Appendices to the Strong and Simple Framework: Liquidity and disclosure requirements for Simpler-regime Firms (bankofengland.co.uk)**, accessed 19 April 2023

Current ILAAP structure	Sub-sections	Proposed ILAAP structure	Sub-sections
Overview		**Overview**	
Summary conclusions		OLAR – Risk Strategy and Appetite	Whilst the title of this section has changed the content is fairly unchanged focused on meeting OLAR and the Pillar 2 risks not captured under Pillar1, but also requesting which quantified risk appetite represents the binding constraint.
LCR and NSFR reporting	Major indices	Stress testing	Framework (Currently part of the stress testing sub-section of **risk management assessment**).
			Evaluation of liquidity buffers and counterbalancing capacity (Currently part of **liquidity risk assessment**).
			Evaluation of liquidity/funding risk (Currently never made very clear where to lay out the 14 risk drivers. Most firms put it in a section before the Stress testing section as it is stated in SS24/15 that all these risk drivers should be considered as part of the internal stress scenarios. This also replaces the Intraday section in **liquidity risk assessment**).
			Stress testing output (Currently part of the stress testing sub-section of risk management assessment).
LCR reporting	HQLA	LCR reporting	HQLA
	Outflows		Outflows
	Inflows		Inflows
NSFR reporting	Available stable funding	NSFR reporting – Most simpler-regime firms will no longer need to report NSFR. Otherwise, LCR and NSFR reporting sections are unchanged apart from being later in the report.	Available stable funding
	Required stable funding	Available stable funding	Required stable funding
Liquidity risk assessment	Evaluation of liquidity needs in the ST/MT	Liquidity and funding risk management framework.	Organisational framework, policies and procedures
		These two sub-sections were previously part of risk management assessment.	Risk identification measurement, management, monitoring and reporting.
	Evaluation ofi Intraday risk –	Other materials –	This section includes the sections on contingency plan, funding plans, and funds transfer pricing, all of which are currently part of the liquidity risk assessment section.
	Evaluation of liquidity buffer and counterbalancing capacity		
Inherent funding risk assessment	Evaluation of funding risk strategy and appetite		
	Evaluation of risks to stability of the funding profile		
	Evaluation of market access		
	Evaluation of the expected change in funding risks based on firms' funding plans		
Risk management assessment	Assess risk strategy and risk appetite		
	Organisational framework, policies and procedures		
	Risk Identification, measurement, management, monitoring and reporting		
	Firms' liquidity specific stress testing		
	Liquidity risk internal control framework (including funds transfer pricing)		
	Liquidity contingency plan		
	Funding plans		

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Liquidity reporting requirements

This section of the paper includes a proposal from the PRA to remove ALMM reporting requirements for four (see listed below) out of the five current reports, with the C68 (Concentration of funding by product type) being the only remaining report. As previously mentioned, NSFR reporting requirements may also be removed depending on the RDR ratio for the last four quarters. These changes in reporting requirements are in line with recent statements made by the PRA regarding the transformation of data collection.

C67 – Concentration of funding by counterparty

C69 – Prices for various lengths of funding

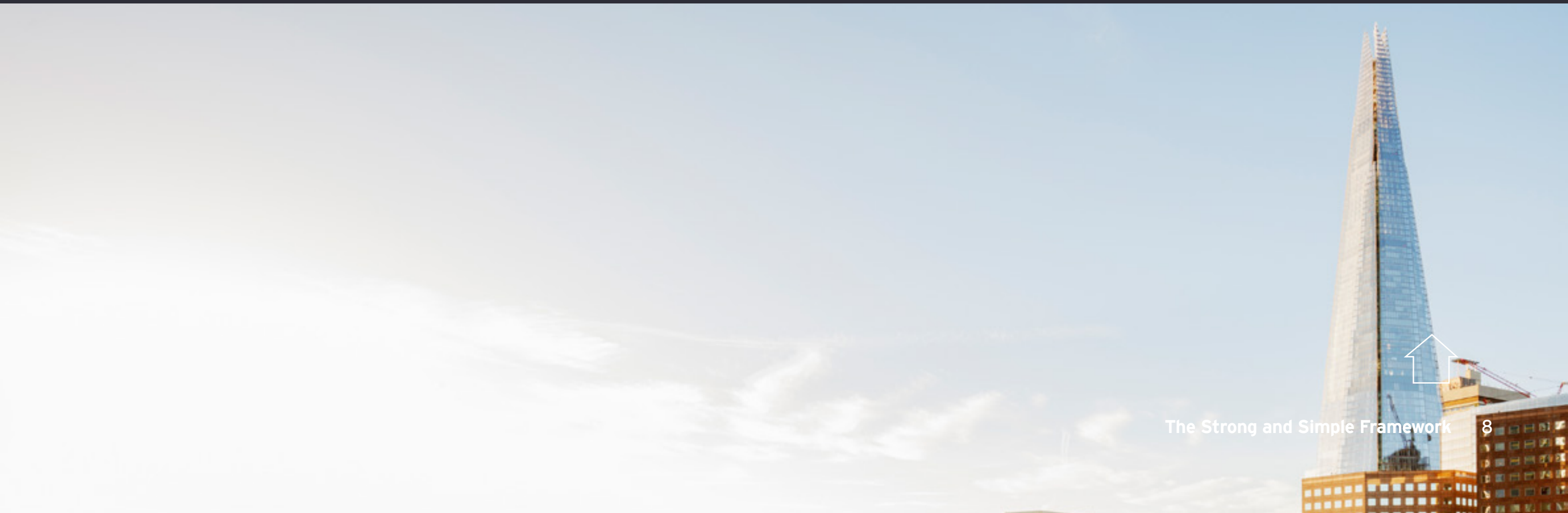
C70 – Roll-over of funding

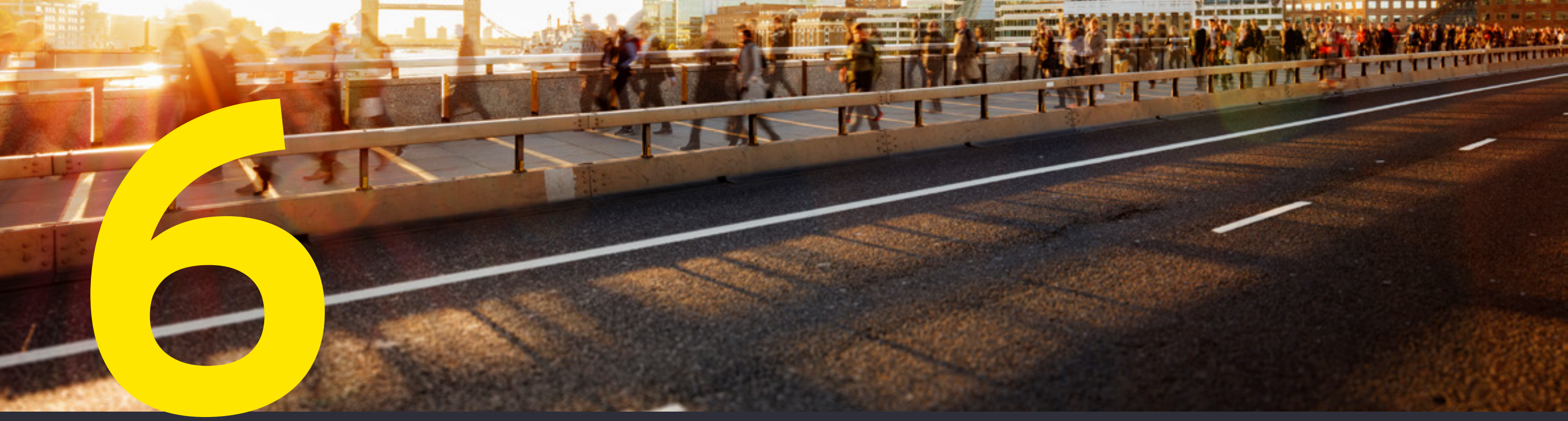
C71 – Concentration of counter-balancing capacity

The ALMM returns measure various dimensions of firms' liquidity and funding risk profile not captured by the LCR or NSFR. The returns capture data related to firms' cash flows, funding and product concentrations, funding costs, and available unencumbered collateral. The data will still be accessible by request in a form that is readily accessible to the firm if the PRA deems it necessary when reviewing the ILAAP.

Although removing these reports will enhance proportionality by reducing costs for the firms, funding concentration risk should still be monitored as part of good risk management. The C67 report for Counterparty Concentration Risk was particularly useful for tracking single-name concentration risk as it laid out the top ten depositors (greater than 1% of total liabilities) along with all other funding. There were also columns showing counterparty sector and residence of counterparty for these top ten counterparties, useful in monitoring sector and geographical concentration risk.

Recent bank failures have also shown the importance of tracking funding concentration risk from a sector perspective.





Pillar 3 disclosures

This proposal aims to enhance the proportionality of disclosure requirements for simpler-regime firms. The PRA is focusing on the lower capacity of these firms to cause significant financial disruption and the difference in stakeholders' use of public disclosures between listed and non-listed simpler-regime firms.

This section of the paper includes proposals from the PRA to:

- Remove Pillar 3 disclosure requirements for the firms without listed financial instruments as part of a proportionate and more targeted approach.
- Streamline requirements for the firms with listed financial instruments. The PRA considers the proposed baseline disclosure to be transparent enough as it includes the key regulatory metrics (UK KM1 – Key Metrics and UK OV1 – Overview of risk-weighted exposure amounts).
- Remove the small and non-complex institution disclosure requirements.

Timeline for the Strong and Simple Framework

CP4/23 provides the first indication of how the PRA intends to simplify regulation for smaller firms, outlining several simplifications to liquidity requirements (the PRA is calling this phase one of the Strong and Simple regime).[1] The deadline for responses to the phase one proposals is 30 May 2023, but the deadline for implementation of phase one changes in liquidity and disclosure requirements from CP4/23 is estimated for H2 2024.

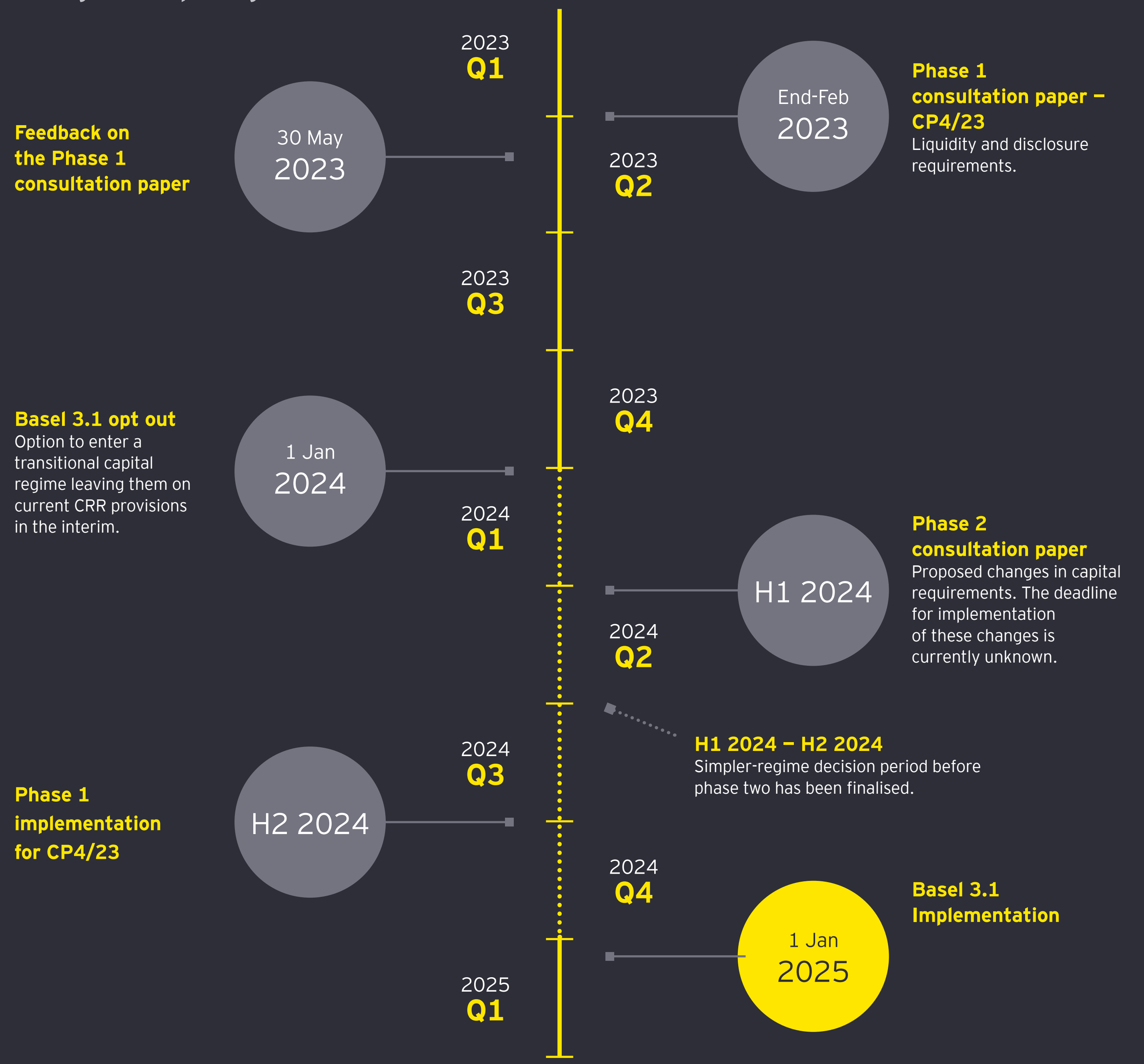
A consultation paper linked to the phase two proposed changes in Pillar 1, Pillar 2, and buffer capital requirements is due for H1 2024. Still, the deadline for implementing these changes is currently unknown (and possibly later than the Basel 3.1 implementation due 1 Jan 2025).

Whilst it is currently uncertain when the capital requirements will need to be implemented, the liquidity proposals must be implemented by H2 2024. However, the PRA has also stated that eligible firms can commit to the regime at least six months before the H2 2024 implementation. (See figure. 1 timeline).

As part of CP16/22 – Implementation of the Basel 3.1 standards[6], firms meeting the criteria on 1 Jan 2024 will be given a choice to opt out of PRA Basel 3.1 standards and enter a transitional capital regime (TCR), leaving them on current capital requirements regulation (CRR) provisions during this interim period as they await implementation of Phase 2 of the simpler regime. However, as the capital simplifications will not be finalised by H2 2024, firms that adopt the new liquidity measures have the option to withdraw from the simpler regime by asking for their modification by consent to be revoked once the new capital requirements are made clear. The PRA plans to include proposals for appropriate transitional arrangements in such cases when it consults on further simplifications. This is to ensure a smooth transition from the simpler regime to the full prudential framework.

[6] "CP16/22 – implementation of the Basel 3.1 standards", Bank of England website, https://www.bankofengland.co.uk/prudential-regulation/publication/2022/november/implementation-of-the-basel-3-1-standards, accessed 19 April 2023.

Strong and Simple Regime timeline



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Simpler-regime criteria

As was laid out in CP5/22 – The Strong and Simple Framework: a definition of a Simpler-regime Firm[3] in July 2022 and DP1/21 'A strong and simple prudential framework for non-systemic banks and building societies'[7] in Dec 2021, the PRA is attempting to address the problem of smaller, less profitable firms being asked to meet the same regulatory requirements as larger more sophisticated firms. After the PRA considered responses to CP5/22, which consulted on the eligibility criteria, proposed updated criteria were laid out in section 2 of CP16/22 in November 2022. These proposed changes in the PRA Rulebook have been laid out in Appendix 6 of the CP4/23 (See table below, summarising the updated eligibility criteria).[1]

Generally, the type of non-systemic firms that fit the criteria will mostly be small domestic retail deposit takers or mortgage lenders with little or no trading book and virtually no international exposure, like building societies and challenger banks. The more complex Tier 1 and Tier 2 firms that are less likely to qualify will rely more on wholesale funding, a large trading book and diversified exposures geographically, leading to extensive foreign exchange activities. These larger firms are also more likely to have total assets over £20bn and very likely to have an internal ratings-based (IRB) rather than standard approach for measuring credit risk. Whilst the regime was not designed for UK subsidiaries of foreign groups, there will be a process for applying for the regime, and the PRA will assess on a case-by-case basis.

It is stated in the Draft Consultation on Operating the Simpler-regime criteria[1] (Appendix 2 of the CP4/23) that when a firm notifies the PRA of ceasing to meet the criteria due to any change in the business model, the firm will be subject to full prudential requirements again. However, on a case-by-case basis, to decide when to revoke the modification direction, the PRA will consider the firm's need for time to prepare in the transition period. The same goes for removal from TCR and the need to comply with PRA Basel 3.1 rules. Revoking on a discretionary basis is also proposed under certain circumstances where firms still meet the criteria but carry out business activities that create risks to the firm's safety and soundness.

[7] "Responses to DP1/21 'A strong and simple prudential framework for non-systemic banks and building societies'" Bank of England website, **https://www.bankofengland.co.uk/prudential-regulation/publication/2021/april/strong-and-simple-framework-banks**, accessed 19 April 2023.

Simpler-regime criteria

An absence of holdings of commodities or commodity derivatives	
A firm not applying an internal ratings based (IRB) approach to calculate its risk exposure amount for credit risk	
A firm not being an operator of a payment system	
Certain requirements that relate to the firm's parent and consolidation group being met	
The size of a firm's total assets	Total assets <£20bn
Domestically located assets of the firm	At least 75% of the balance sheet always
	At least 85% on average over the last three years
	Loans to foreign customers secured by UK assets are considered domestic assets.
The small scale of the firm's foreign exchange activities	Thresholds were relaxed as firms would only need average net foreign exchange activity to be less than or equal to 2% of own funds in at least one of the last three months and in six of the last twelve months; but
	Cannot exceed 3.5% of own funds at any time
A firm not providing certain clearing, settlement or custody services	Providing these services on a GBP intragroup basis is now allowed.
The small scale of the firm's trading activities	Thresholds were relaxed as firms would only need the average on- and off-balance sheet trading book size to be less than or equal to both 5% of total assets and £44mn on the last day of at least one of the last three months and on the last day of at least six of the last twelve months.

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What lies ahead as we prepare for the simpler-regime?

Non-systemic banks and building societies that meet the simpler-regime criteria must begin to weigh up the pros and cons of the lighter liquidity regulations. As previously discussed, firms will need to decide how much the improvements in the proportionality of prudential risk management are suitable for their business model while considering how the loss of certain regulatory reports or metrics makes self-assessment of liquidity risks and monitoring of internal metrics even more important.

However, before making a final decision, firms should assess the proposed changes to capital requirements. Whilst it is currently uncertain when the capital requirements will need to be implemented, the liquidity proposals must be implemented by H2 2024. Therefore, when the second consultation is published in H1 2024, it will be time for firms to decide whether to join the regime and consider the option of the TCR in the interim.

However, the capital simplifications will not be finalised by H2 2024. Certain firms that adopt the new liquidity measures may withdraw from the simpler regime once the new capital requirements are made clear.

Appendix 1

Proposed amended policies

Policy material	Proposals
PRA Rulebook: CRR Firms: Simpler regime Instrument (2023)	The instrument would amend the following Parts of the PRA Rulebook: ‣ Glossary ‣ Simpler Regime – General application ‣ Liquidity (CRR) ‣ Reporting (CRR) ‣ Disclosure (CRR)
Supervisory Statements (SS)	**This CP would amend:** ‣ The PRA's approach to supervising liquidity and funding risk (SS24/15)
Statement of Policy (SoP)	**This CP would amend:** ‣ SoP 'Pillar 2 Liquidity' ‣ SoP 'Liquidity and funding permissions' **This CP would introduce:** ‣ Draft SoP 'operating the Simpler-regime Firm criteria'

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