Reduce risk and stay compliant by trusting the data at the foundation of your business

Where BCBS 239 supervision stands in 2026, and what your lineage has to be able to show.

The Basel Committee published its Principles for effective risk data aggregation and risk reporting in January 2013, and global systemically important banks were expected to comply by 2016. Thirteen years on, supervisors report that the work is not finished.

> ***"The SREP 2025 outcomes point to persistent deficiencies in banks' RDARR frameworks, with no improvement in the relevant average sub-score as compared with last year."***
>
> **European Central Bank, Supervisory priorities 2026-28, November 2025**

WHAT CHANGED, AND WHAT DID NOT

- **The European Central Bank (ECB) named risk data aggregation and risk reporting (RDARR) a priority for 2026-28.** A system-wide strategy approved in December 2024 monitors every supervised bank and tracks remediation, starting with management body accountability and widening to data quality and IT architecture. Targeted on-site inspections continue for banks carrying unresolved findings.
- **The Basel Committee named data lineage directly.** Its January 2026 newsletter (No. 36) states that data lineage "is important for confirming data quality," and that legacy systems, distributed data estates, and lineage that changes over time all complicate end-to-end traceability. The newsletter states it "does not constitute new supervisory guidance or expectations."
- **The May 2024 guide remains the operative specification.** What changed is enforcement posture and the volume of on-site examination.

WHAT THE GUIDE ACTUALLY ASKS FOR

> ***"Complete and up-to-date data lineages on data attribute level (starting from data capture and including extraction, transformation and loading) for the risk indicators, and their critical data elements, identified as being within the scope of application."***
>
> **European Central Bank, Guide on effective risk data aggregation and risk reporting, section 3.4**

COMPLETE

End to end, from data capture through to the risk report that consumes the figure. A trace that stops at a system boundary does not meet it.

DATA ATTRIBUTE LEVEL

Column level, not table level. Knowing a table feeds a report says nothing about which field produced the number.

UP TO DATE

The lineage reflects the environment as it stands, not as it stood when the last programme closed.

WHY MOST LINEAGE STOPS SHORT

Your data rarely stays inside one system. It moves between departments and countries, and calculations, formulas, and transformations are applied along the way. Many tools treat that middle section as a black box, recording that data went in and came out without interpreting what happened inside.

Solidatus reads the code within extract, transform, and load processes and shows the business logic applied at each step. Automated connectors cover the systems they can reach, and visual modelling covers the ones they cannot, which keeps a trace unbroken across mainframes and vendor platforms.

- A complete view of source and destination through every system rather than a subset
- Drill into a column and analyse the root cause and business impact of a quality issue, at the attribute level the guide specifies
- A record of how the environment looked in the past and what changed, so you evidence a remediation by showing it rather than asserting it
- **Proactive rather than reactive:** model a new regulation against your current and future state, give the board figures it can trace to source, and check downstream impact on AI models before a change reaches production

PROOF · MODELLING HSBC'S WHOLESALE CREDIT AND LENDING BOOK

HSBC set out to document and model its end-to-end wholesale credit and lending book, demonstrating traceability from source to consumption. After assessing competitor software, HSBC chose Solidatus. A team of two built the model in under six months.

	COMPETING APPROACH	WITH SOLIDATUS
Cost	$5M+	**Under $0.5M**
People	25 full-time	**2 full-time**
Duration	18 months	**6 months**

> ***"With Solidatus, I can visualize the data model for each business outcome, manage the requirements of key stakeholders and provide greater clarity over the intricacies involved in addressing their requests. Only Solidatus gives you this level of control."***
>
> **Sid Mubashar, Head of Wholesale Credit & Lending Data and Monitoring, HSBC**

- 2,000 source tables, 80,000+ fields, and 20,000+ data linkages across 45 source systems used globally
- A self-service single source of truth serving 500+ internal users
- Now carries ESG reporting, liquidity calculations, and risk-weighted asset optimisation alongside its original purpose

TALK TO US

Bring one critical data element and one prior examination finding to a working session. We map the element end to end, reconstruct the model as it stood when the finding was raised, and show you the difference.

Book a Solidatus demo → or email hello@solidatus.com

Sources. European Central Bank, "Supervisory priorities 2026-28," November 2025 — bankingsupervision.europa.eu. Basel Committee on Banking Supervision, "Implementation of the Principles for effective risk data aggregation and risk reporting (BCBS 239 Principles)," Newsletter No. 36, 6 January 2026 — bis.org/publ/bcbs_nl36.htm. European Central Bank, "Guide on effective risk data aggregation and risk reporting," May 2024 — bankingsupervision.europa.eu/ecb/pub/pdf. Basel Committee on Banking Supervision, "Principles for effective risk data aggregation and risk reporting," January 2013 — bis.org/publ/bcbs239.htm.