



## **Feedback Paper on Consultation Paper CP2025/02**

# **The JRA's Continuity of Access to Financial Market Infrastructure (FMI) and Liquidity & Funding in Resolution Guidance Notes**

A feedback paper relating to the JRA's consultation on its planned Guidance Notes on Continuity of Access to FMI and Liquidity & Funding in Resolution capabilities required to support resolvability of Jersey Banks.

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## Glossary of terms

Defined terms are indicated throughout this document as follows:

Banking Code	Code of Practice for Deposit-taking Business
Banking Law	Banking Business (Jersey) Law 1991
Critical Function	Activities, services or operations the discontinuance of which is likely to lead to the disruption of services that are essential to the real economy in Jersey or the disruption of financial stability due to the size, market share, external and internal interconnectedness, complexity, or cross-border activities of a bank or bank's group, with particular regard to the substitutability of those activities, services or operations.
Home Resolution Authority	The resolution authority in the JIB's home jurisdiction.
Jersey Bank	A person registered to carry on deposit-taking business in or from within Jersey under the Banking Law
Jersey Branch	The Jersey operations of an Overseas Incorporated Bank.
Jersey Incorporated Bank (JIB)	A Jersey incorporated company registered to carry on deposit-taking business under the Banking Law.
JRA	Jersey Resolution Authority
Overseas Incorporated Bank	A person not incorporated in Jersey that is registered to carry on deposit-taking business under the Bank
PS2023/01	Policy Statement 2023/01 'Resolution Planning and Resolvability'.
Resolution Law	Bank (Recovery and Resolution) (Jersey) Law 2017

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# 1 Executive Summary

## 1.1 Overview

- 1.1.1 On 4 July 2025 we issued a Consultation Paper that sought views on our draft Continuity of Access to Financial Market Infrastructure (FMI) Guidance Note, our proposed FMI Reporting Template and our draft Liquidity and Funding in Resolution Guidance Note.
- 1.1.2 The Liquidity and Funding in Resolution Guidance Note impacts Jersey Incorporated Banks (JIBs), especially those performing Critical Functions. The Continuity of Access to FMI Guidance Note and associated FMI Reporting Template impacts all Jersey Banks and mainly those that are performing Critical Functions. Both Guidance Notes expand on the requirements set out in our Policy Statement 2023/01 'Resolution Planning and Resolvability' (PS2023/01).
- 1.1.3 This Feedback Paper summarises the feedback we received and our response to that feedback.
- 1.1.4 We have considered the feedback received and made changes to the Continuity of Access to FMI Guidance Note.
- 1.1.5 Following concerns raised by some Jersey Banks regarding the draft FMI Reporting Template originally adapted from the Single Resolution Board (SRB), we initiated an informal consultation on 20 November 2025. As a result, we have now adopted an FMI Reporting Template that is aligned to the Bank of England's (BoE) equivalent template, amending the associated guidance on completing accordingly.
- 1.1.6 No changes were required for the Liquidity and Funding in Resolution Guidance Note.
- 1.1.7 The final version of both Guidance Notes and the FMI Reporting Template are appended to this Feedback Paper (including tracked change versions of the Guidance Notes) and will be published on our website.

## 1.2 Feedback received

- 1.2.1 We received written responses from eight Jersey Banks with respect to Continuity of Access to FMI and from two JIBs with respect to Liquidity and Funding in Resolution. Respondents are listed in Appendix A. Not all respondents commented on every question raised in the consultation.
- 1.2.2 Section 2 of this Feedback paper sets out a summary of the substantive comments received and our responses to that feedback. In general respondents were supportive of the approach set out in both Continuity of Access to FMI and Liquidity and Funding in Resolution Guidance Notes. On the FMI Reporting Template, some respondents suggested aligning to the UK equivalent.
- 1.2.3 Based on the feedback received we have made amendments to the Continuity of Access to FMI Guidance Note and moved to an FMI Reporting Template that is aligned to the BoE equivalent.

- 1.2.4 In summary, the Continuity of Access to FMI Guidance Note has primarily been amended to:
  - 1.2.4.1 Clarify that Jersey Banks will not be required to identify and report FMIs owned and operated by Central Banks;
  - 1.2.4.2 Provided further guidance to Jersey Banks which are part of banking groups without developed home resolution authorities;
  - 1.2.4.3 Clarify to Jersey Banks that bilateral engagement with FMI service providers such as CCPs is not mandatory; and
  - 1.2.4.4 Provide further guidance on additional steps to enhance resolution preparedness – particularly addressing alternative arrangements Jersey Banks would be required to take should the JRA identify potential risks that a Jersey Bank may be unable to maintain continued access to Critical FMI Services in the lead up to and during resolution.
- 1.2.5 The Liquidity and Funding in Resolution Guidance Note has not been amended. However, this Feedback Paper provides clarification on a query raised by a respondent concerning the required frequency with which Jersey Banks must conduct testing of their Liquidity and Funding in Resolution capabilities.
- 1.2.6 We are grateful to all those who took time to participate in the consultation process.

### 1.3 Next steps

- 1.3.1 We have taken account of the feedback we received and made some amendments to the Continuity of Access to FMI Guidance Note and adopted the equivalent of the BoE FMI Reporting Template. We concluded not to make amendments to the Liquidity and Funding in Resolution Guidance Note.
- 1.3.2 Final versions of the Continuity of Access to FMI Guidance Note, Liquidity and Funding in Resolution Guidance Note (including a tracked change version), and the FMI Reporting Template are appended and will be published on our website.
- 1.3.3 Jersey Banks should factor the Guidance Notes into existing plans, leveraging group capabilities where relevant, to ensure that they can meet the requirements set out in PS2023/01.
- 1.3.4 Interim self-assessments in respect of Continuity of Access to FMI and Liquidity and Funding in Resolution Guidance Notes are due by 30 June 2026. Full self-assessments across all risks to resolution are due by 30 June 2027.
- 1.3.5 Further enquiries in relation to the Consultation Paper, this Feedback Paper or the Guidance Notes may be sent to Edmore Murungu ([info@jra.org.je](mailto:info@jra.org.je))

## 2 Consultation Feedback

### 2.1 Continuity of Access to FMI Consultation Feedback

The table below summarises the feedback received in response to the Consultation Paper with respect to the draft Continuity of Access to FMI Guidance Note along with our responses. The ordering of questions mirrors the order of questions in the Consultation Paper

Consultation Question	Respondent's Comments	JRA Response
Question 1: Are you comfortable with the guidance on identifying providers of Critical FMI Services and mapping to Critical Functions and Core Business Lines? If not, please explain why	<p>Six respondents commented on this question, with four noting that they are broadly comfortable with the requirements.</p> <p>One respondent, despite being broadly comfortable, noted that Central Bank facilities (i.e., FMIs owned and operated by Central Banks) are addressed through direct engagement by regulators themselves. The respondent further noted that capturing such facilities would not align with the principle of proportionality generally applied by global resolution authorities and would represent a requirement exceeding that of the respondent's home regulator.</p>	<p>We have also revised the wording in the Guidance Note (paragraphs 4.1.3 and 4.1.4) to reflect that this is now presented as an option rather than a requirement. Consequently, Jersey banks will not be required to identify and report FMIs owned and operated by Central Banks.</p>
	<p>Another respondent enquired whether the JRA intends to provide a standardised methodology for Jersey Banks to use when identifying and classifying Critical FMI services to ensure consistency across the sector, or whether this will instead be determined based on each bank's support for Critical Functions.</p>	<p>In developing our Guidance Note, we did not identify any examples of either the BoE or the SRB providing a standardised methodology for banks to follow when identifying and classifying Critical FMI Services. We do not believe it would be an efficient use of JRA resources to develop such a methodology for banks to use (although we agree it could aid consistency of approach across the sector).</p>

Consultation Question	Respondent's Comments	JRA Response
<p>Question 2: Are you comfortable with the guidance relating to understanding of conditions for continued access to Critical FMI Services during resolution? If not, please explain why</p>	<p>Five respondents commented on this question, with two noting that they are broadly comfortable with the requirements.</p> <p>One respondent expressed support for the JRA's approach in differentiating requirements for Jersey Banks that access FMIs directly from those that do so indirectly through their group. The respondent further recommended that the JRA ensure all guidance and policy documents clearly delineate the obligations applicable to Jersey-headquartered banks, Jersey-incorporated banks with overseas headquarters, and Jersey Branches of overseas-incorporated banks. This clarification, the respondent noted, would help mitigate confusion and reduce the risk of misinterpretation across the industry.</p>	<p>We plan to take the same approach for future guidance notes where possible. In due course we may revisit and update existing guidance notes.</p>
	<p>Another respondent requested clarification on the JRA's expectations for Jersey Banks that are part of banking groups without an established home resolution authority.</p> <p>The respondent also sought guidance on the requirements applicable to Jersey Branches that do not have direct relationships with FMI service providers.</p>	<p>We have added a footnote (on paragraph 4.5.2.1) to explain that, if the Jersey Bank's group has not implemented equivalent requirements, the Jersey Bank (or its Group) will need to implement capabilities to meet JRA requirements for Continuity of Access to FMI and take account of the guidance set out in the guidance note.</p> <p>Jersey Branches that perform Critical Functions but do not have direct relationships with FMI service providers—accessing FMIs indirectly through their groups—are only required to address the guidance outlined in Section 4.5 of the Guidance Note while Jersey Branches that are not deemed to perform Critical Functions remain out of scope at this time.</p>

Consultation Question	Respondent's Comments	JRA Response
	<p>A further respondent, while generally comfortable with the guidance, noted that engaging bilaterally with certain Critical FMI service providers—particularly CCPs—is not practical. The respondent highlighted that CCPs typically do not conduct bilateral discussions with member organisations regarding continued access in resolution, as this would result in numerous repetitive engagements.</p>	<p>We have updated paragraph 4.2.1 to clarify that the listed steps—such as bilateral engagement—are suggested practices rather than mandatory requirements. This change reflects the practical limitations highlighted by the respondent, particularly regarding bilateral engagement with certain Critical FMI service providers like CCPs.</p>
<p>Question 3: Are you comfortable with the guidance relating to FMI playbooks? If not, please explain why.</p>	<p>Five respondents commented in respect of this question with three noting that they were broadly comfortable with the requirements.</p> <p>One respondent anticipates that existing contingency plan documents for Critical FMIs will comply with the necessary standards. The respondent also noted that these plans undergo annual reviews and detail essential financial and operational responsibilities, including termination rights and access conditions. Full membership criteria are not replicated internally, as they are generally publicly accessible (e.g., through CCP Rulebooks).</p> <p>On Usage of FMIs and FMI Intermediaries, the respondent noted that these are captured at group level, and that group would not readily provide the Jersey Bank with specific data due to the collated processing of transactions within the group.</p>	<p>We have updated the Guidance Note (paragraph 4.3.3) to clarify that other related documents, such as contingency plans, may be used to satisfy the requirements for Continuity of Access to FMI.</p> <p>The respondent's approach is reasonable, and we do not require reporting of transaction volumes. Therefore, no concerns.</p>

Consultation Question	Respondent's Comments	JRA Response
	<p>Another respondent requested clarification regarding the methodologies employed by the JRA to assess whether its FMI playbook and FMI mapping align with expected resolvability standards. Additionally, the respondent inquired whether the JRA intends to apply specific principles or metrics when reporting on Critical FMIs.</p>	<p>Our initial approach to assessing banks' capabilities relating to Continuity of Access to FMI will be desk-based. However, this may evolve over time to include site visits, as necessary.</p> <p>We have not developed any formal principles or metrics at this stage. However, we may evolve our approach in the future.</p>
<p>Question 4: Are you comfortable with the guidance on additional steps to enhance resolution preparedness? If not, please explain why.</p>	<p>Five respondents commented on this question, with two noting that they are broadly comfortable with the requirements, and another noting its understanding that these additional steps will not be required if a Jersey Bank is accessing an FMI directly via its group.</p>	<p>We have amended the Guidance Note by adding paragraph 4.4.1 to clarify that alternative arrangements will only be required if either a Jersey Bank or the JRA identifies a risk that the bank may be unable to maintain continued access to Critical FMI services in the lead-up to and during resolution.</p>
	<p>One respondent, whilst comfortable with our approach, sought clarity to determine that its home resolution authority's approach is satisfactory and that the JRA would not expect a substantial increase in the number of FMIs subject to detailed contingency planning at the level of the identified Critical FMIs.</p> <p>A further respondent requested that the JRA clarify whether there are any additional requirements for Jersey Branches beyond reliance on their home resolution authorities.</p>	<p>For Jersey Branches which only access FMIs indirectly via their group, the JRA expects the Jersey Branch to identify Critical FMI Services, map these to Critical Functions, and to report them to the JRA. Where there is an established Home Resolution Authority, the JRA anticipates being able to rely on its work on resolvability at the group level.</p>

Consultation Question	Respondent's Comments	JRA Response
<p>Question 5: Are you comfortable with guidance for Jersey Banks that access FMI services indirectly via their group? If not, please explain why.</p>	<p>Four respondents commented on this question, with two of them broadly comfortable with our proposed approach.</p> <p>One respondent considers it disproportionate to provide full details of transaction volumes at the Jersey Branch level for all FMIs accessed via the group, as these transactions are aggregated at the group level rather than at the branch level.</p>	<p>The respondent raised a valid observation. However, our position is that Jersey Banks which access FMIs indirectly through their group arrangements will not be subject to transaction summary reporting requirements, as such access is managed at the group level.</p>
	<p>Another respondent noted that it accesses FMIs indirectly via its group and that the full requirements for continuity of access to FMIs will be covered by its group's submissions to its home resolution authority. However, given the size and complexity of its group, it would be problematic to identify the specific FMI access relevant to its Jersey operations. As a result, it indicated that it would struggle to meet the JRA's requirements in this area. The respondent requested that the JRA consider accepting a confirmation from its group that appropriate arrangements are in place to maintain orderly access to FMIs through a resolution event.</p>	<p>We acknowledge the concerns raised by the respondent. However, as the respondent has indicated that it accesses FMIs indirectly through its group, it is only required to follow the guidance set out in section 4.5 of the Guidance Note. Specifically, this entails identifying Critical FMIs necessary to ensure continuity in resolution and reporting these to the JRA.</p> <p>While we expect to rely on the work undertaken by the home resolution authority in respect of continuity of access, Jersey Banks are nonetheless required to identify and report their Critical FMIs.</p> <p>We continue to work with the respondent to identify a reasonable approach to meeting our requirements. If other Jersey Banks experience similar challenges, they should engage with the JRA as soon as possible.</p>

Consultation Question	Respondent's Comments	JRA Response
<p>Question 6: Are you comfortable with the Continuity of Access to FMI Guidance provided in relation to JIBs not performing Critical Functions? If not, please explain why.</p>	<p>Respondents have indicated that they are broadly comfortable with and supportive of our proposed approach.</p>	<p>n/a</p>
<p>Question 7: If applicable, please set out any other areas relating to Continuity of Access to FMI Guidance Note that you believe require further guidance?</p>	<p>Three respondents commented on this question noting the following:</p> <p><b>Amendment to the Guidance Note</b> – One respondent recommended that the JRA revise wording in paragraph 4.3.3 to read: “<i>FMI playbooks (or other related documentation) should contain...</i>” The respondent notes that change avoids confusion or technical inaccuracies, acknowledging that some requirements of the FMI playbooks are documented elsewhere — such as in contingent plans or when addressing Liquidity, and Funding in Resolution requirements.</p> <p><b>Portability of Client Positions (paragraphs 4.3.5 to 4.3.7)</b> – The respondent further noted that the requirements may not be truly applicable to or within the control of Jersey Banks. The respondent noted that CCPs generally state that a default leads to termination of membership and whilst they typically publish procedures for transfer of positions in the event of a defaulting member, such actions are dependent on the CCP not the defaulting member.</p>	<p>We have made the suggested amendment to reflect that other documents may contain the listed information (paragraph 4.3.3).</p> <p>Whilst we appreciate that the portability of Client Positions may be outside of a Jersey Bank’s control, the fact that CCPs publish processes for the transfer of positions should allow Jersey Banks to make an assessment of portability where needed.</p>

Consultation Question	Respondent's Comments	JRA Response
	<p><b>The structure of the Guidance Note</b> – Another respondent believes the structure of the draft guidance note creates confusion, particularly in distinguishing between requirements for Jersey banks that access FMIs directly and those that do so via their groups. It recommends clearly separating the guidance into two sections:</p> <ul style="list-style-type: none"> <li>› One for banks accessing FMIs directly; and</li> <li>› Another for banks accessing FMIs indirectly through group arrangements.</li> </ul>	<p>This was to some extent covered by paragraph 2.1.2 of the guidance note. We have modified the wording of this paragraph to emphasise that Jersey Banks which only access FMI indirectly via their group need only address the guidance set out in Section 4.5.</p>
	<p>A further respondent asked whether the JRA intends to establish minimum requirements for testing continuity arrangements and governance oversight to ensure FMI accessibility during resolution.</p>	<p>Jersey Banks should note that the Continuity of Access to FMI is a guidance note, not a policy document; therefore, it does not prescribe any specific testing requirements. However, we expect Jersey Banks performing Critical Functions to adhere to quality assurance and internal audit requirements as set out in PS2023/01 and associated guidance as outlined in our Management and Governance Guidance Note.</p>

## 2.2 The FMI Reporting Template Consultation Feedback

The table below summarises the feedback received in response to the Consultation Paper with respect to the draft FMI Reporting Template along with our responses. The ordering of questions mirrors the order of questions in the Consultation Paper

Consultation Question	Respondent's Comments	JRA Response
Question 1: Do you agree with the JRA's approach of adopting the relevant SRB templates with minimal amendments? If not, please explain why and set out the approach you would prefer the JRA to adopt	<p>Five respondents provided feedback on this question.</p> <p>Two of them indicated that they are broadly comfortable with the proposed FMI Reporting Template, which is aligned to the SRB. Of the two respondents which were comfortable, one noted that our alignment with the SRB offers valuable opportunities for validation and benchmarking against other jurisdictions.</p> <p>Another respondent was concerned that the draft FMI reporting template (based on the SRB's template) was onerous and too detailed when compared to what the BoE requires. It noted it would prefer a submission template in line with the BoE since any other approach creates substantial workload for it.</p> <p>A further respondent noted that the BoE requires that its group utilises a version of the EBA template, and its preference is to adopt the same approach in order to:</p> <ul style="list-style-type: none"> <li>○ minimise the impact of additional reporting requirements; and</li> <li>○ ensure consistency in reporting from group level down to Jersey.</li> </ul>	<p>We have obtained a copy of the BoE equivalent FMI Reporting Template, along with guidance for completing it. Following a thorough review and comparison with the SRB Template, and after conducting an informal consultation with Jersey Banks, we have decided to adopt the BoE equivalent template. This decision reflects our assessment that it provides sufficient information while reducing the reporting burden for most Jersey Banks, particularly those whose groups are under the BoE's remit.</p> <p>We have updated paragraph 1.1.4.3 of the Guidance Note and Section 7 (Appendix A) to include guidance on completing the BoE equivalent FMI Reporting Template.</p> <p>The JRA remains flexible: any Jersey Bank that prefers to use the SRB template may continue to do so. However, in the future, the JRA may revise this approach to promote uniformity and consistency across submissions.</p>

Consultation Question	Respondent's Comments	JRA Response
	A final respondent sought clarity on the level of granularity required by the JRA, particularly in relation to transaction data, collateral, and intraday liquidity exposures	Our revised template does not include fields for such metrics. If Jersey Banks wish to utilise the SRB FMI Reporting Template when reporting to the JRA, they are not required to complete the <b>Key Metrics Tab</b> .
Question 2: Is there any other information you believe the JRA should add to the FMI Reporting Template?	No feedback provided	n/a

## 2.3 Liquidity and Funding in Resolution Consultation Feedback

The table below summarises the feedback received in response to the Consultation Paper with respect to the draft Liquidity and Funding in Resolution Guidance Note along with our responses. The ordering of questions mirrors the order of questions in the Consultation Paper

Consultation Question	Respondent's Comments	JRA Response
Question 1: Are you comfortable with the Liquidity and Funding in Resolution guidance provided in relation to JIBs performing Critical Functions? If not, please explain why.	<p>While both respondents were broadly comfortable with the guidance, one respondent sought clarification on the frequency with which JIBs should test their Liquidity and Funding in Resolution capabilities. The respondent highlighted that paragraph 4.3.3 of the Guidance Note specifies testing should occur at least annually, whereas paragraph 4.5.4 refers more generally to testing being conducted on a regular basis.</p> <p>Another respondent welcomed the alignment of the Guidance Note with the BoE's requirements.</p>	<p>Our decision not to prescribe a specific frequency for testing Liquidity and Funding in Resolution capabilities is intentional and consistent with the approach adopted by the BoE. This flexibility enables JIBs to design testing schedules that reflect their unique risk profiles, operational complexities, and liquidity needs, rather than adhering to a rigid, one-size-fits-all requirement. By applying a risk-based approach, JIBs can ensure that testing remains proportionate, targeted, and responsive to changes in their business model and market conditions, while aligning with resolvability expectations. This approach promotes efficiency without compromising robust preparedness for resolution scenarios, ultimately supporting resilience and liquidity and funding in resolution objectives.</p>
Question 2: Are you comfortable with the Liquidity and Funding in Resolution guidance provided for JIBs that are part of banking groups headquartered outside Jersey? If not, please explain why.	<p>Both respondents were broadly comfortable with the guidance provided for JIBs that are part of banking groups headquartered outside Jersey. However, one respondent prefers that other JRA guidance and policy documents similarly set out clear expectations for JIBs within groups headquartered outside Jersey—particularly where well-developed home resolution plans are in place—just as the JRA has done with respect to Liquidity and Funding in Resolution Guidance Note.</p>	<p>We acknowledge the feedback provided and confirm that the JRA intends to maintain this approach in future guidance. While previous policies and guidance notes have generally incorporated this principle, it has not always been articulated explicitly.</p>

Consultation Question	Respondent's Comments	JRA Response
Question 3: Are you comfortable with the Liquidity and Funding in Resolution guidance provided in relation to JIBs not performing Critical Functions? If not, please explain why.	Both respondents were broadly comfortable and supportive of our proposed approach and noted that it appears proportionate and well-considered.	n/a
Question 4: If applicable, please set out any other areas relating to Liquidity and Funding in Resolution that you believe require further guidance?	No feedback provided	n/a

## Appendices

### Appendix A: List of respondents to the consultation

1.1 We received responses from the following:

- 1.1.1 Barclays Bank plc, Jersey Branch
- 1.1.2 BNP Paribas S.A., Jersey Branch
- 1.1.3 Butterfield Bank (Channel Islands) Limited, Jersey Branch
- 1.1.4 HSBC Bank Plc, Jersey Branch
- 1.1.5 Royal Bank of Canada (Channel Islands) Limited
- 1.1.6 Standard Bank Jersey Limited
- 1.1.7 Standard Chartered Bank, Jersey Branch
- 1.1.8 The Royal Bank of Scotland International Limited

### Appendix B: Tracked change version of Continuity of Access to FMI Guidance Note

A tracked change version of Continuity of Access to FMI Guidance Note is appended as a separate document.

### Appendix C: Final version of Continuity of Access to FMI Guidance Note

The final version of Continuity of Access to FMI Guidance Note is appended as a separate document.

### Appendix D: Final version of Liquidity and Funding in Resolution Guidance Note

The final version of Liquidity and Funding in Resolution Guidance Note is appended as a separate document

### Appendix E: Final version of the FMI Reporting Template

The final version of the FMI Reporting Template is appended as a separate document