

International Deposit Insurance Survey

Section 1: Background Information

1.1 Organization (deposit insurer) responsible for administering the deposit insurance system:

1.1.1 Organization Name:

Bank of Finland

1.1.2 Organization Address:

Bank of Finland Snellmaninaukio P.O. Box 160 FIN-00101 Helsinki

1.1.3 Organization Telephone No:

+358 9 1831

1.1.4 Organization Fax No:

1.1.5 Organization Internet Address:

www.bof.fi

1.2 Contact Person(s):

1.2.1 Contact Person(s) Name:

1.2.2 Contact Person(s) Address:

1.2.3 Contact Person(s) Telephone:

1.2.4 Contact Person(s) Fax:

1.2.5 Contact Person(s) E-mail address:

1.2.6 Are there other deposit insurance systems operating in your country ? (i.e. applying to other types of non-bank or non-depository institutions e.g.. insurance, securities) Please state their name(s) and contact information:

1.3 Please provide information on other participants in your financial system safety-net:

1.3.1 Name of Central Bank:

1.3.2 Central Bank Address:

1.3.3 Central Bank Telephone:

1.3.4 Central Bank Fax:

1.3.5 Central Bank Internet Address:

1.3.6 Central Bank Contact Person:

1.4 Financial Supervisor:

1.4.1 Financial Supervisor Name:

Financial Supervision

1.4.2 Financial Supervisor Address:

1.4.3 Financial Supervisor Telephone:

+358 9 18351

1.4.4 Financial Supervisor Fax:

1.4.5 Financial Supervisor Internet Address and contact:

www.rata.bof.fi

1.5 Other related entities:

1.5.1 Other Related Entities Name:

1.5.2 Other Related Entities Address:

1.5.3 Other Related Entities Telephone:

1.5.4 Other Related Entities Fax:

1.5.5 Other Related Entities Internet Address:

Section 2: Objectives, Mandates & Powers

2.1.1 When and why was the DIS established (please provide details)?

Act on Credit Institutions of January 1, 1970, establishing mandatory membership for all Finnish banks in a deposit protection scheme of the relevant trade associations. In July 1995 the initial implementation of EU Directive 94/19 was carried out. The technical changes made at that time on the Act on Credit Institutions included the obligation of the Deposit Guarantee Fund to compensate the claims of depositors and the additional protection of the branches of foreign credit institutions and the obligation to publish information on the scheme. The Finnish deposit guarantee scheme was revised as of beginning of 1998. All deposit banks shall belong to the Deposit Guarantee Fund. There is just one fund which is common for all deposit banks (commercial banks, savings banks and cooperative banks. Before 1998, three independent associations existed in Finland; the first established in 1924 (cooperative banks), the second founded in 1931 (savings banks), the third, created in 1965 (commercial banks). Before 1998 the guarantee was blanket (100 %) and now the deposits are guaranteed up to a maximum of 25.000 euro.

2.1.2 What are the stated public policy objectives or mandate for your country's DIS? When was the last time they were reviewed and changed?

The object of the Fund is to compensate the claims of depositors; the Fund shall not support the solidity of its members like it was before 1998. The last revision was as of the beginning of 1998.

2.1.3 What process was used to determine these objectives in your country?

The process for the development of public policy for the Finnish financial sector is undertaken by the government through the Ministry of Finance and it involves consultation with Financial Supervision Authority, the Bank of Finland and other interested parties.

2.1.4 What is the legal basis under which the DIS was established? Please provide a copy.

Legislation
The Act on Credit Institutions

2.1.5 Is there a formal process for a periodic review of the policy objectives/mandates?

No

2.1.6 What sort of system do you have?

Government legislated & privately administered

2.1.7 Who makes decisions to pay depositor claims?

Supervisor

2.2 Which of the following powers has been provided to the DIS in order to

carry out its mandate?

2.3 Authority to

2.3.1 Enter into contracts

No

2.3.2 Set regulations or by-laws for conduct of its business

No

2.4 Authority over entry and exit of member deposit taking institutions

2.4.1 Establish terms and conditions of membership

No

2.4.2 Authority to terminate the insured status of a member institution

Yes

2.5 Depositor reimbursement

2.5.1 Affect reimbursement of depositors claims

Yes

2.5.2 Access to depositor information

Yes

2.5.3 Use various methods of reimbursing depositors claims

No

2.6 Funding

2.6.1 How funding is provided

No

2.6.2 Terms and conditions of premiums or levies

No

2.6.3 Borrowing authorities and limits

Yes

2.7 Information Requirements

2.7.1 Access to information directly from member deposit taking institutions or its auditors

Yes

2.7.2 Access to information through supervisory authorities

No

2.8 Enforcement and intervention

2.8.1 Authority to conduct examinations and/or reviews

No

2.8.2 Ability to set standards or guidelines for member institutions

No

2.8.3 Authority to take enforcement actions against members (i.e. such as the authority to require a change in institutional control and/or behaviour).

No

2.8.4 Authority to cancel deposit insurance of a member institution

2.8.5 Authority to hold officers and directors of failed institutions legally liable for the failure of the institution

No

2.9 Failure resolution

2.9.1 Authority to decide on appropriate form of failure resolution

No

2.9.2 Authority to provide financial assistance (e.g. in the form of a loan -- with or without security -- by purchasing assets from the institution or through some other process).

No

2.9.3 Authority to guarantee deposits with member institutions or guarantee loans to an institution by other parties

2.10 Authority to:

2.10.1 Undertake formal liquidation

2.10.2 Purchase and assumption (sale and merger)

2.10.3 Open assistance (bridge bank)

2.10.4 Other forms of failure resolution

2.11 Optimizing recoveries

2.11.1 Ability to act as a receiver

No

2.11.2 Ability to act as a liquidator

No

Section 3: Governance Arrangements

3.1.1 Is the DIS a legally separate organization from other public or private bodies? (e.g. central bank, supervisor, industry association)

No

The Fund is overall independent although it is supervised by the Financial Supervisory Authority

3.1.2 What is the form of governance used by the DIS organization?

Board of Directors

The Fund does not have any staff of its own. The daily tasks are taken care of by the employers of the Finnish Bankers' Association. |null|null|null|null|

3.1.3 How is the governing body selected?

The delegation of the Fund is elected by the member deposit banks and the member foreign credit institutions and the Board of Directors is elected by the Delegation.

3.1.4 What is the composition of the governing body?

At least six and at most 14 members shall be elected to the Board of Directors for one year at a time. At least one of the members of the Board of Directors shall represent the branches of foreign credit institutions that are members of the Fund. Usually the directors are directors, officers or employees of member institutions.

3.1.5 What are the duties and responsibilities of the governing body?

The Board of Directors shall 1. represent the Fund and sue and be sued on behalf of the Fund as well as to manage the operations of the Fund 2. decide on the admission to and dismissal from membership in the Fund of a branch of a foreign credit institution as well as on the granting of its resignation 3. confirm the contribution payment to be collected annually from the members as well as the time of its collection 4. decide, in accordance with the general instructions issued by the Delegation, on the administration and investment of the assets of the Fund 5. attend to the payment of compensations payable from the assets of the Fund 6. decide on the notification to be submitted to the depositors on the commencement of the duty to pay of the Fund as well as the public announcement relating to the compensation procedure 7. decide on the taking out of a loan to the Fund

3.1.6 Is there any direct or indirect representation in the management of the DIS by member insured institutions?

3.1.7 Is there any direct or indirect representation in the management of the DIS by the central bank?

3.1.8 Is there any direct or indirect representation in the management of the DIS by the regulator?

3.1.9 Is there any direct or indirect representation in the management of the DIS by the supervisor?

3.1.10 Is there any direct or indirect representation in the management of the DIS by other?

3.1.11 Please provide a breakdown of the management structure of the DIS

The Fund is managed by the Board of Directors. The Board of Directors has appointed the Secretary General who is responsible for the management of the day-to-day matters of the Fund in accordance with the instructions issued by the Board of Directors as well as represent the Fund in matters belonging to his duties.

3.1.12 Do you have an internal control and audit systems

Yes

The Fund has an auditor elected by the Delegation.

3.1.13 Are directors and officers of the DIS and/or supervisors personally liable for their decisions in the normal course of their activities?

No

3.1.14 Is there an advisory committee to the DIS?

No

3.1.15 Has the DIS ever taken legal action against directors of failed member institutions? Or others? What position did the person(s) hold?

No

3.1.16 Please indicate which of the following tools are used as part of your accountability regime.

Section 4: Human Resources & Infrastructure

4.1.1 What is the total number of employees at the DIS (e.g. full-time, part-time and contract) ?

0

4.1.2 Are the majority of DIS employees dedicated staff or do they come from other organizations (i.e. government, central bank, private sector)?

No

The Fund does not have any staff of its own. The daily tasks are taken care of by the employers of the

Finnish Bankers' Association.

4.1.3 Does the DIS train and develop its own staff? If so, briefly describe programs which have been put in place for training and development?

No

4.1.4 Is there shared training and development between the staff of the DIS and other authorities involved in financial sector supervision or regulation? (i.e. central bank, supervisor, regulator, other)

No

4.1.5 Are compensation and incentives offered sufficient to attract and retain skilled staff? Please elaborate.

1

4.1.6 Are confidentiality provisions for employees provided for?

No

4.1.7 Do employees of the DIS receive legal protection against lawsuits for their actions taken in good faith and acting in the best interests of the DIS?

No

4.1.8 What percentage of the budget is spent on training and development and information technology?

0

Section 5: Information Sharing & Interrelationship Among Safety-Net Players

5.1.1 Who performs examinations of DIS member institutions?

Supervisor

5.1.2 Please describe the examination process that is used to evaluate member institution performance?

The member institutions are supervised by the Financial Supervisory Authority (FSA). The FSA may appoint an attorney to supervise the activities of any member institution if there is evidence of incompetence, carelessness or corruption in the management of its affairs or if there is some other cause for such action. The FSA may appoint an attorney to supervise the liquidation of assets if a supervised entity is declared bankrupt.

5.1.3 What information is collected from member institutions for the DIS and other parties?

The member institution shall submit annually the information necessary for the calculation of the contribution payment as well as, on request of the Board of Directors of the Fund, the information necessary for the assessment of the risk and the duty to compensate incurred by the Fund from the operations of the member institution. In order to have the claims of depositors compensated, the member institution shall submit to the Fund information on the depositors and their claims to be compensated.

5.1.4 What arrangements (i.e. formal or informal) are in place between

organizations responsible for deposit insurance and other parties comprising the safety-net (e.g. central bank, supervisor, regulator) regarding the sharing of information concerning member institutions? Please provide details of these agreements.

The Rules of the Fund and amendments thereto are confirmed by the Ministry of Finance. The Fund is supervised by the FSA. The minutes of the meetings of the Delegation and the Board of Directors are submitted to the FSA.

5.2 On a scale from 1 to 5, 1 being low and 5 being high, please rate both the accessibility (i.e. access to all necessary information for the DIS to fulfill its mandate) and timeliness (i.e. information is received when needed) of information that is shared amongst members of the safety net.

5.2.1 accessibility

3

5.2.2 timeliness

3

5.2.3 Is there a consistent definition/classification across authorities of problem institutions

No

5.2.4 When policy regarding the DIS and financial sector is developed or amended, are other bodies consulted and/or advised (e.g. central bank, supervisor, regulator, government, industry associations) ? If you do consult and/or advise what bodies do you do it with?

5.2.5 Is discussion with other bodies encouraged prior to the implementation of new policy?

5.2.6 How often do you contact other DIS?

Occasionally

5.2.7 Is the DIS consulted when the regulator, supervisor or central bank enters into an agreement with a financial institution that is experiencing problems?

No

Section 6: Membership

6.1.1 What types of institutions are covered in your DIS?

All deposit banks shall belong to the Deposit Guarantee Fund : commercial banks, savings banks, savings banks with limited liability, cooperative banks, local cooperative banks.

6.1.2 Is membership in the DIS mandatory for designated deposit taking institutions?

Yes

6.1.3 Do you have terms and conditions of membership? (i.e. laws, regulations or agreements which member institutions have to abide by) If so, please explain the application process used and any conditions of membership imposed on institutions by the DIS.

6.1.4 Is the membership of foreign institutions (i.e. foreign bank branches and/or subsidiaries) covered in the same way as domestic institutions? If not, please describe the difference.

Other

A credit institution authorised in a State belonging to the European Economic Area may apply for membership in the Fund for its branch established in Finland in order to supplement the cover of the claims of depositors if the cover of its home State cannot be deemed as adequate as the cover provided by the Fund. The Ministry of Finance shall decide on the membership in the Fund of a branch of a foreign credit institution authorised in a State not belonging to the EEA in accordance with terms provided by the Ministry.

6.1.5 If more than one safety-net organization is responsible for the application process for membership, how is the application process coordinated between the parties responsible?

-

6.1.6 Are deposit-taking institutions required to re-apply for membership after a certain period of time?

No

6.1.7 How many member institutions do you have?

8 Commercial banks 39 Savings banks 2 Savings bank with limited liability 246 Cooperative banks 1 Cooperative bank with limited liability 42 Local cooperative banks

6.1.8 What is the total level of assets, deposits and insurable deposits of all DIS member institutions?

Assets EUR 150.000.000.000 (31 Dec 2002) Deposits EUR 64.000.000.000 (31 Dec 2002) Insurable deposits EUR 33.000.000.000 (31 Dec 2002)

Section 7: Coverage

7.1.1 Is there a formal definition of a deposit and or insured deposit used by your DIS? If so what is it?

7.1.2 What types of deposits are eligible for coverage in your DIS?

Savings account, Chequing account, Foreign currency deposits

null|null|null|null|null|null|null|null|null|null|

7.1.3 Is coverage

per depositor per institution

7.1.4 What is the coverage limit per depositor?

The claims of a depositor shall be compensated from the assets of the deposit-guarantee fund, however, at most to an amount of (150 000 FIM) EUR 25.000

7.1.5 How was this figures arrived at?

The level provide credible protection for the majority of depositors.

7.1.6 For eligible financial instruments with maturity dates, what is the longest contract term covered by the DIS?

No

7.1.7 What types of depositors are not eligible for coverage in your DIS?

Foreign (non-residents),Corporations (domestic),Corporations (foreign)

null|null|null|null|null|

7.1.8 Is the coverage amount indexed?

No

7.1.9 What is it indexed to?

-

7.1.10 Does your DIS use coinsurance? If coinsurance is used please describe the approach used.

No

7.1.11 Is the public widely aware of the presence of coinsurance?

7.1.12 Are coverage levels affected by resolution methods? If so, please explain.

No

7.1.13 To what extent, is there a public expectation that the DIS coverage limit would be extended to 100% coverage in the event of a banking crisis or the failure of a very large institution? Please provide recent examples, if applicable.

No

7.1.14 How is a decision made on the insurance eligibility of new financial products?

-

7.1.15 When member institutions merge how are insured deposits treated?

No rules

7.2 Does your country offer the following?

7.2.1 Islamic banking

7.2.2 Islamic deposit insurance

Section 8: Funding & Fund Management

8.1.1 What type of funding is used by the DIS?

8.1.2 Is the DIS funded by levying insurance premium assessments against member institutions or, by some other means such as general tax revenues?

Premium assessment

8.1.3 If insurance premiums are assessed, are they assessed as a flat rate or are they differential in some way, please explain? (e.g. risk based)

The subscription includes a fixed part (0,05 per cent of the insured deposits) and a contribution based on solvency (maximum 0,25 per cent of the insured deposits).

8.1.4 What is the current premium rate? If there have been changes to this rate, details would be appreciated.

0,05 per cent (the fixed part) + max 0,25 per cent (based on solvency on the member bank)

8.1.5 How often is the premium assessed?

Annually

8.1.6 Is the premium assessed on total deposits, insured deposits or something else?

Insured Deposits

8.1.7 Are premiums paid by member institutions tax deductible as a business expense?

Yes

8.1.8 For premiums that are differentiated please explain the risk assessment system that is used to ascertain a premium assessment.

The premium based on solvency is 0,125 per cent of an amount calculated by multiplying the ratio of the total amount of consolidated own funds required to cover the risks and the total amount of consolidated own funds by the total amount of deposits subject to compensation, however, not more than 0,25 per cent of the said deposits.

8.1.9 Does the DIS have a target with respect to the optimal size of the DIS fund? (Yes is chosen go to question 8.10 otherwise Skip the next 2 questions)

8.1.10 How is the optimum level (i.e. target) of the fund determined?

When the net assets of the Fund, calculated as the difference between the assets and liabilities of the Fund, amount to at least two per cent of the aggregate total of the deposits of the deposit banks subject to compensation, the contribution payment shall be one-third of the contribution normal. And when the ten per cent mark has been reached, the contributions shall be suspended.

8.1.11 What investment policies (i.e. safeguards against abuse) exist concerning the use of the fund?

Yes

8.1.12 If a fund is not maintained, is an assessment levied on institutions after the failure of a financial institution has occurred? If so, please explain how the levies are determined and losses distributed among institutions.

No

8.1.13 Which of the following sources of additional funding, for emergency or liquidity purposes, does the DIS have access to?

8.1.14 Are member institutions required by law to issue, on a regular basis, subordinated debt?

No

Section 9: Reimbursing Depositors

9.1.1 Please describe the procedure for reimbursing depositors used by your DIS?

If a deposit bank has failed to pay matured and indisputable claims of a depositor, the depositor may notify the Financial Supervision Authority (FSA) thereof. The FSA shall decide whether the Fund shall pay the claims of the depositors. The FSA shall notify the Fund, the deposit bank and the Ministry of Finance of its decision. The deposit bank shall submit to the Fund information on the depositors. The Fund shall decide on the notification to be submitted to the depositors on the commencement of the duty to pay of the Fund as well as the public announcement relating to the compensation procedure.

9.1.2 Are depositors required to file a claim when a member institution fails? If so, what is the process?

Other

No compensation incidents have been occurred, yet. The procedure is under preparation.

9.1.3 When is the DIS obligated to reimburse insured depositors?

If a deposit bank has failed to pay matured and indisputable claims of a depositor, the depositor may notify the Financial Supervision Authority (FSA) thereof. The FSA shall decide whether the Fund shall pay the claims of the depositors.

9.1.4 Is there an established legal basis upon which to base the reimbursement process? Please explain.

Yes

The Act on Credit Institutions

9.1.5 Is the DIS subject to explicit standards for prompt reimbursement? If so what are they?

Yes

Within 21 days from the notice the FSA shall decide whether the Fund shall pay the claims of the bank's depositors. The Fund shall pay the claims within three months from the decision of the FSA. The FSA may, on exceptional circumstances, grant the Fund a maximum of three extensions for the payment and each extension may at most be three months.

9.1.6 What methods of payment can be used and under what circumstances are they used?

The procedure is under preparation.

9.1.7 Are the rules regarding clearing, set-off, trust accounts, and related issues well defined (through the legal system or formal agreement)? Please explain.

No

9.1.8 What are financial institutions obligated to hold with respect to deposit records?

In order to implement a decision of the FSA, the deposit bank shall submit to the Fund information on the depositors and their claims.

9.1.9 When is the DIS given access to an institutions financial and depositor records?

No

9.1.10 Does the DIS have the option of making advance payments to depositors in situations of dire need (i.e. in an emergency)?

No

9.1.11 Does the DIS make interest payments to depositors during the time taken for reimbursement? Please explain.

No

9.1.12 What information is communicated to depositors regarding the reimbursement process?

The information procedure is under preparation.

9.1.13 What process does the DIS use to ensure that depositor secrecy and confidentiality is maintained during the reimbursement process?

The Fund may not disclose the information to others than the authorities that under law are entitled to receive information subject to a secrecy obligation.

9.1.14 What steps are taken to verify, reconcile and settle insured deposit accounts?

The procedure is under preparation.

9.1.15 What steps are taken to ensure that an institutions depositor records are accurate, up to date and accessible?

The procedure is under preparation.

9.1.16 Does the DIS document its experiences with respect to each reimbursement action (i.e. lessons learned) in order to allow for continuous improvement?

Other

No such incidents have occurred.

9.1.17 What technologies does the DIS use to facilitate the reimbursement process?

The procedure is under preparation.

Section 10: Public Information & Awareness

10.1.1 What obligations are there to inform the public?

A deposit bank shall inform its depositors of the cover provided by the Deposit Guarantee Fund for the

claims of the depositors as well as of changes in information given previously. The bank shall submit the information in the official languages of the country in which its branch is established. The Fund shall notify the depositors of the bank in question. The Fund shall also, by a public notice, notify the depositors of the measures that the depositor shall undertake to safeguard their claims.

10.1.2 Who is responsible for communicating information about the DIS to the general public?

Other

null|null|null|null|null

10.1.3 Are these explicitly stated in policy or law?

10.1.4 Are the terms and conditions of DIS explained in a manner that the general public can understand fully?

Yes

10.1.5 If so, what methods are utilized?

Brochures, Website

null|null|null|null

10.1.6 At what point is information disclosed to the public about an institution that is having problems and how is information disclosed?

The Fund shall notify the depositors of the bank in question after the FSA has decided that the Fund shall pay the claims of the depositors.

10.1.7 Has a survey of public awareness about the DIS been conducted? If so/ what were the results? If not why not? Please include supporting documentation.

10.1.8 Has the DIS ever embarked on a public awareness campaign to increase awareness and knowledge? If yes, how many times has this been done and when was the last time?

No

The Fund has not resources enough to the campaign.

10.1.9 Please describe the approach used; objectives, target audience, communication strategy, and timing results.

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Section 11: Risk Assessment & Intervention

11.1.1 Does the DIS have a risk monitoring function to analyze and assess the risk of member financial institutions?

No

11.1.2 Does the DIS perform examinations of its member institutions? If not, who does?

No

The Financial Supervision Authority

11.1.3 Does the DIS receive information/data/statistics directly from its member institutions or from a third party, such as a regulator or supervisor? If so what information is received and how often?

Yes

The member institution shall submit annually prior to the last day of March the information necessary for the calculation of the contribution payment as well as, on request of the Board of Directors of the Fund, the information necessary for the assessment of the risk and the duty to compensate incurred by the Fund from the operations of the bank or the branch.

11.1.4 What is the risk assessment approach used by the DIS to monitor financial institutions? Please describe. Please be sure to include the criteria used to determine member institution risk.

The procedure is under preparation.

11.1.5 Please list and describe the actions taken by the DIS in situations where member institutions are causing concern. Please indicate when coordination occurs with other supervisory/regulatory authorities and the mechanisms used.

The procedure is under preparation.

Section 12: Failure Resolution

12.1.1 Is your DIS involved in the failure resolution of member institutions?

No

12.1.2 Who determines whether a member institution has failed or is insolvent?

12.1.3 Under what conditions can the DIS cancel/terminate the deposit insurance of a member institution?

12.1.4 How is the failure/non viability of a member institution determined?

12.1.5 How many member institutions have failed in your country in the last 20 years?

12.1.6 Do banks go through the regular corporate bankruptcy process? If no, what is the process used?

12.1.7 Is the receiver of failed institutions also the one that disposes of the institutions? If not, who does?

12.2 Which methods of failure resolution are used in your country to deal with failures. Also, please indicate the frequency of use of the various methods in the last 20 years.

12.2.1 Formal liquidation

12.2.2 Purchase and assumption (sale and merger)

12.2.3 Open bank assistance (e.g. recapitalization)

12.2.4 Bridge banks and other interim solutions

12.2.5 What criteria are used to determine the method of failure resolution?

12.2.6 Is the deposit insurer required to resolve failed or failing insured depository institutions in a manner that is least costly to the DIS?

12.2.7 Please indicate what kind of private companies, if any, are included in the failure resolution process?

Section 13: Claims, Recoveries & Estate Management

13.1.1 Does the DIS play a role in the claims and recoveries process? If yes please describe this role

No

13.1.2 What is the primary objective of the DIS when dealing with claims and recoveries (i.e.. maximization of nominal and present value recoveries, financial system stability, system discipline)?

13.1.3 What role does the private sector play in the claims, recovery process?

13.1.4 What approaches and strategies are adopted by the deposit insurer to accomplish the objectives of claims and recovery activities?

13.1.5 By what standard is the DIS judged with respect to performing its function in claims and recoveries (e.g.x. Comparative private sector or DIS benchmarks, internal assessments, past experience)?

13.1.6 What assets have you found to be the hardest to recover? Why? What types of strategies have been used to recover different assets?

13.1.7 Does the DIS have rights of subrogation (i.e. the subrogation of insurance entity to the rights of insured depositors) or an equivalent arrangement?

13.1.8 Is there depositor priority when banks fail? (i.e. Do depositor claims rank in priority above other unsecured creditors in the liquidation of a bank?)

13.1.9 Are rights of set-off available or imposed in your countrys legal system? Please describe the various forms set-off can take.

Section 14: Other Issues

14.1.1 What is your view on recent trends and emerging issues in the financial sector in your country and the potential impact they might have on the DIS?

14.1.2 Are there any issues related to deposit insurance which you would like to see more research in?