

Macro-prudential Supervision Framework Implementation and Financial Audit to Strategy

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Abstract: After financial crisis era domestic macro-prudential supervision framework study become economic and financial theory attention of hot at the same time financial audit maintenance financial stability role also get common attention. Macro-prudential supervision framework implementation can the financial audit development influence promote the audit target, Range, Content and technology mode change. Macro-prudential supervision framework implementation of financial audit of influence also can from nearly four years Audit audit results announcement in find evidence. From promote macro-prudential supervision framework implementation perspective see financial audit need to introduce external power to extended audit range need of macro-prudential supervision framework of implementation carry out performance evaluation and audit, need to constantly perfect risk-oriented audit governance mechanism and innovation government audit and supervision institutions coordination

Keywords: macro-prudential supervision; Framework implementation; financial audit; Collaborative development; performance evaluation; risk-oriented; government audit; financial supervision

1. Introduction

So-called macro-prudential supervision framework General think is according to prevention and control system importance financial risk need to the Construction of cover multiple Supervision Subject, Prudent supervision policy and tools of system including macro-prudential analysis, Macro-prudential policy tools and macro-prudential policy arrangements And Content. Financial field prudent supervision concept from Basel Committee 1997 Years The 《Effective Banking Supervision core principle Of. In the your files in prudent supervision principle was as an one of the most important of core principles established down. Since then China The 《Banking Supervision Management Method Of the Commercial Banking Law Of And about financial legal regulations also reference international banking supervision practice and The 《Effective Banking Supervision core principle Of Of basic spirit established the banking prudent supervision of concept and principle. World range of macro-prudential supervision framework of Attention began in 2008 Years Since of after economic crisis era the framework of aimed at prevention and response to systemic financial risk. 2009 The beginning of international liquidation Bank (BIS) Put forward with macro-prudential of concept to analysis led to the subprime crisis in "Big and fail", The periodic, Supervision, Standard don't higher problem. 2009 Years 4 Month 2 The G20 summit concluded on Sunday announced the establishment of the Financial Stability Committee (FSB) International Organization for macro-prudential supervision of global financial stability. In view of this "Thirteen five" In the plan, we should strengthen the construction of financial macro-prudential management system, reform and improve the financial regulatory framework to adapt to the development of modern financial market, and effectively prevent systematic, Regional financial risk. In practice, a series of prudent rules have been formulated, including risk management, Internal control, Capital Adequacy Ratio, Asset Quality, Loss Reserve, Risk concentra-

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tion, Associated transaction, Macro-prudential assessment system is established to assess the capital and leverage of commercial banks., Assets and liabilities, Liquidity, Pricing Behavior, Asset Quality, External debt risk, Risk profile in credit policy implementation. 2016 In recent years, the implementation of China's macro-prudential regulatory framework has entered a new stage of practical operation, marking that China's central bank has upgraded the existing differential Reserve Dynamic Adjustment and agreed loan management mechanism to a macro-prudential assessment system..

China 《Audit Act》 And 《Regulations on the Implementation of the Audit Law》 It also provides for the financial audit by audit institutions, that is, the People's Bank of China, State Administration of Foreign Exchange, central state-owned enterprises and financial institutions, Assets of enterprises and financial institutions whose central state capital is holding or dominant as prescribed by the State Council, Liabilities, profits and losses shall be audited and an audit report shall be issued, and an audit decision shall be made within the statutory authority or a proposal shall be made to the relevant competent authorities for handling the punishment. Practice has proved that financial audit due to its independence, Authority, Comprehensive and extended economic supervision characteristics, to reveal the financial market supervision, Market Operation, Rule Making, Financial innovation, Information disclosure and other aspects of risk hidden danger and to national judicial organs transfer major illegal crime clues the to important role powerful maintenance the national financial market stability and national economic security.

After financial crisis era originated from the state of systemic risk of attention macro-prudential supervision framework came into being. 2015 Years China's Stock Market, Bond Market of Fierce Fluctuation events is contributed to the Framework "Landing" And practice and bring the financial governance concept of remodeling and supervision system adjustment need. In order to adapt to the new of audit coverage and the need, 2015 Years 12 Months central Introduction The 《On Perfect audit system several major problems of framework views Of》 And The 《Province The following place audit organs people property unified management pilot programme Of》 Due to this reform decided to happen in China's macro-prudential supervision framework implementation critical period so can as and macro-prudential supervision framework implementation phase collaborative of major initiatives. So in macro-prudential supervision framework implementation and financial audit collaborative development perspective under study how to give full play to the financial audit advantage promote macro-prudential supervision framework effective run has important reality significance.

This paper in then content in will review macro-prudential supervision framework Connotation, Implementation content financial audit maintenance financial stability role and its and financial supervision relationship coordination and literature analysis macro-prudential supervision framework implementation of financial audit Influence, and from promote macro-prudential supervision framework effective the standpoint of the Implementation Financial Audit to deal with measures and suggestions.

2. Literature Review

After financial crisis era domestic about macro-prudential supervision framework study become economic and financial theory attention hot at the same time financial audit in maintenance financial stability role also get common attention, highlight researchers on financial audit in macro-prudential supervision framework implementation in role of attention.

(A) macro-prudential supervision connotation and supervision tools select

Zhou Xiaochuan in "Macro-prudential policy: , Asia perspective" Superior Seminar on pointed out that in order to avoid various ambiguity macro-prudential policy can understand for capital requirements, Capital Buffer, Liquidity, Leverage macro-prudential policy should be attention inverse cycle policy, To deal with sheep effect and Market Failure phenomenon and to deal with financial trading complicated and of more widely of international standard and. Ba shusong combined with foreign related research think macro-prudential supervision by the risk correlation of analysis on system importance of institutions the supervision to prevent and resolve systemic risk it is to

safeguard the financial system good operation, avoid economic experience major loss of a kind of prudent supervision mode^[2].Zheng Lend Lease,, And who

Xu think and micro-prudential supervision different macro-prudential supervision more pay attention to the whole financial system of stability systemic risk of supervision main

To systematic risk of accumulation and outbreak Mechanism.Xie Ping,Zou chuan wei from time dimension and Cross-Industry dimension two aspects the research

Research on lead to finance tong shun periodic of capital adequacy ratio Supervision,Loan loss provision,Fair value accounting and other factors the know

(Two) financial audit for maintenance Financial Stability of unique role

The theory circle generally from government audit inherent of characteristics and the advantages to argument and the financial audit for maintenance Financial Stability of not

An.Cui zhi qing,Dong method only and think government audit in financial supervision has aloofness,Professional,Re-regulation,Extension audit^[7].Yang book arms think relative to Central Bank,China Banking Regulatory Commission and other financial supervision institutions Financial Audit in maintenance financial stability has the theory of natural advantage can through special audit investigation and work, have targeted to and timely to found and resolve cross-industry dimension and cross-time dimension of systemic risk^[8].Song often and think government audit of all cover characteristics can break separate supervision of boundaries of Financial In government audit responsibility framework and play advantage angle in audit content deepening,Audit Methods update and proposed countermeasures.Such as Cui zhi qing,Dong method to put forward the need to study and understand national macro-decision-making Department of Policy carry out more value of special investigation more from macro-on writing comprehensive investigation report and^[7]; Zhang Qin proposed should be will audit key from traditional financial business steering financial institutions and financial management institutions really

Is do supervision don't blank poplar book arms think should be strengthen the Shadow bank,Large financial holding the company and other important financial institutions of audit supervision widely carry out the whole process tracking audit Strengthen Financial Institutions internal control audit^[8].

(Three) financial audit and financial regulation Coordination Development

In macro-prudential supervision framework implementation process in financial audit and regulators coordination content and work form will continue to deepen.And xiu star,

Cao strict ceremony of study found financial audit and financial supervision integration is becoming for International Development Trend financial supervision can not be separated from the financial audit gold

Study show that people can play their respective supervision advantage regular held financial supervision combined with work meeting by the National Audit Office responsible for unified Summary,Series

Of know has not been unified in but this not exclusion financial audit in macro-prudential supervision framework implementation process in play more and more important of Role.But previous scholars on financial audit in macro-prudential supervision framework under maintenance financial stability role of investigate the main is from theory level be definition lack of observation evidence, not from macro-prudential supervision framework implementation of financial audit of influence perspective to thinking financial audit should be improved of work strategy and orientation.

3. Macro-prudential supervision framework implementation of financial audit of Influence Analysis

(A) Influence mechanism an overview

Certain history period of financial outstanding problems in and prominent task usually contains the profound of history background and political legal origin also the cover the political,Legal Environment and certain economic environment factors.In the face of the current complex changing of international domestic economic financial

environment and mixed industry business trend more obvious of background to deal with systemic financial risk for content of macro-prudential supervision framework came into being. Macro-prudential supervision framework construction is global range economic and financial field a thing big its implementation process will change national audit organs of audit environment. And audit environment of development change will profoundly influence audit target, Content and audit methods of development. Financial Audit active change to implementation and increasingly development changes of audit environment of target this not only about financial supervision and financial audit effective collaborative problem also about financial audit their own prevention, Reveal, Against "Immune System" Benign development. China The 《On Perfect audit system several major problems of framework views Of Also clear to put forward how to keep "Problem

(Two) Specific Performance

Financial Audit participate in macro-prudential supervision framework construction of prominent problem is Role Positioning problem at present compare the consistent of view think financial audit is macro-prudential supervision framework important composition part. Also the financial audit based on its economic supervision of authority, Professional, Comprehensive and extensibility and advantage play maintenance Financial Stability of role to help macro-prudential supervision target of implementation. Financial

Audit target is audit nature and specific environment each other contact and each other role of Product. Financial Audit after long development its overall audit target gradually fixed for the was Audit Unit Financial, Financial revenue and expenditure and related economic activities of authenticity, Legitimacy and benefit implementation supervision. Macro-prudential supervision framework implementation process in and changes of audit environment audit target need in three A aspects be strengthen or extension: A is further strengthen authenticity, Legitimacy requirements for financial supervision institutions decision-making provide by filtering of data and in time to stop and correct economic activities in violation behavior effective prevention and stop risk accumulation; two is development benefit requirements, macro-prudential supervision framework implementation in objective on the need to financial audit of multiple camera of and dynamic supervision tools of Operation Performance Evaluation and formation of the whole supervision system and all kinds of regulatory institutions of performance audit; three is in Authenticity, Legitimacy based on extension the evaluation risk requirements traditional financial audit and compliance audit in audit personnel on business risk or control risk of evaluation main is more effective implementation substantive review, its evaluation conclusion General without body now audit report in however based on macro-prudential supervision framework implementation in systemic risk early recognition and exposing on the need, financial audit conclusion should contains the was audit unit or project of market risk, Credit risk or operation risk of evaluation.

According The Audit Law Of And The Implementation of the Audit Law Regulations Of In the relevant provisions of the national audit organs of Audit Object cover Central Bank, State-owned financial institutions, State-owned capital accounted for holding status or leading status of financial institutions audit range involved related assets, Liabilities, Profit and Loss or financial expenditure. However this a definition in practice in has been formed Financial Audit exposing on systemic risk of adverse limit. After Crisis Era, "Countries regulators common attention space dimension of financial risk spread change attention and strengthen the system importance Financial Institutions of systemic

Risk conduction way of Supervision "Here of system importance financial institutions actually not limitations in state-owned capital mainly or national holding of Financial Institutions a large number of non-state-owned and other at all levels all kinds of financial entity can be can become systemic risk conduction chain in a link, become breeding and spread systemic risk of important field. Future based on and macro-prudential supervision framework implementation phase collaborative of need to Financial Audit Object and range extension of won't stop. Can see of is, The 《Audit Law Of And The 《Implementation of the Audit Law Regulations Of In about Audit Object and range aspects will usher in Revision.

Based on audit target, Object, Range Change Analysis audit content also will corresponding get extended. In

accordance with development benefit requirements financial audit to financial audit for main content of situation face change future financial audit to financial audit mainly of situation will gradually extension to Department

System of risk early warning,Financial Tools run performance,Financial institutions performance audit and the whole supervision framework system performance audit aspects.This the financial audit evaluation put forward severe challenges for example supervision framework system operation performance evaluation need comprehensive policy implementation,Implementation of Regulations,Institutions shoe

Level,Professional talent reserve,Financial consumer protection,Violations discipline event quantity and Loss Measurement and science to design evaluation index and evaluation process.

Audit range,Content Change is audit methods and technology internal force.With the will as an audit content of Shadow bank,Table the business into supervision framework in the standardization monitoring and assessment in and insurance,Securities financial institutions mixed industry business trend evolution China Financial Risk cumulative performance in more a business field part risk also involved entity economic development.In addition in macro-prudential supervision conventional assessment before some financial institutions has whitewash,Cover up business data or financial data of fraud motivation this increased use of data the assessment of supervision risk.For this construction the to adapt to high-risk audit project of risk evaluation system implementation of systematic risk of early exposing on and recognition mechanism become financial audit important task.Financial Audit should use its financial audit experience and audit analysis advantage positive explore Based on Risk early recognition of audit technology mode Implementation of Data filter of widely cover and market risk early warning.

(Three) based on audit results notice the effect of the Effect Analysis

Audit results announcement system is as an audit organs"Immune System"Function to effective play of a important system contains government audit work process and important results.From the National Audit Office nearly four years audit results announcement in we select which and Financial Activities Supervision directly related of part and induction (Such as table1)Strive to summed up the nearly four years China's macro-prudential supervision framework implementation of financial audit influence effect situation.

The previous table listed in situation we think in macro-prudential supervision framework under the background of the implementation of the financial audit work present some new of change, reflect for Financial Audit Work active to adapt to China's macro-prudential supervision framework implementation need to about Department conscious Strengthen Financial Audit investment in audit range,Content on the make adjustment.Specific for we think main have the following characteristics.

A is financial audit project quantity not much but have year by year increasing situation.2013Years2016Years audit cumulative release of and Financial Activities Supervision directly related of audit results announcement totalNatural 20A Which assets liabilities Profit and Loss audit project14The In addition6The of tracking illegal disciplinary problems keeping shall be completed within situation (containing financial unit violations problem).Two is financial audit project coverage was expansion situation.Longitudinal see2013Years,2014Years main-oriented State-owned bank the audit gradually extension to-oriented State-owned holding insurance group the company,Securities Business Institutions and Financial Department The Audit.Self-2015Years the audit results announcement content format have fine-tuning major policy-making and implementation,Risk Management,Internal control,Clean self-discipline and other content also contains in the and announcement content of space also significantly increase.Three is cross-system Financial Audit

serious or risk exposure of financial field violations disciplinary problems the strict investigation.

However from macro-prudential supervision framework implementation need to angle see financial audit still have is big efforts Space.

One by resources and conditions control audit range is not wide audit content owe in-depth.Should be see national audit organs by its personnel,Time and other factors every year-oriented financial unit of financial audit coverage very limited from disclosure of information,2013Years2016Years the audit of bankers number in

turn3Home,2Home,2And1Home and four years time in only, China Agricultural Bank get two times Audit.In accordance with construction macro-prudential supervision framework need to audit range need to cover all of financial institutions but in the current audit resources very limited situation under fear up to less than Parties expected long-term so easy to contributing to offenders"Lucky"Psychological.From thisNatural 20Audit Results Announcement in can found although has mentioned Business Performance,Major policy implementation,Risk Management,Internal control and other aspects, but subject to the scope of the audit (only included in the beginning of the audit project plan of financial units), the depth and breadth of the issue (only cases, difficult to focus on industry and market risks).Second, the performance evaluation of financial institutions is not enough..In theory, performance audit in the data source,Forensic methods,Evaluation Index System Construction and other aspects of the financial audit is difficult to match, which leads to the performance audit can not be widely carried out..However, the implementation of the macro-prudential regulatory framework objectively requires an independent third-party evaluation of the performance of financial institutions, so as to urge and promote the improvement of regulatory level..Over the past four years, there has been no performance audit for financial regulators or other financial units..Third, the coordination mechanism between audit and regulatory agencies needs to be optimized.In the face of various types of financial entities illegal, audit organs and regulators have common responsibilities, should work together to share responsibilities, to explore the linkage mechanism. However, from the results of the audit results announcement, this kind of linkage mechanism is mainly reflected in the Process of audit investigation and evidence collection."Request assistance"On this level, there is room for improvement in the content and form of coordination between audit organs and regulators..

On the basis of consolidating and expanding the existing achievements in promoting the effective implementation of the macro-prudential regulatory framework, financial audit should also focus on the following aspects:

The foregoing analysis shows that although the financial audit object has covered,Insurance,Securities,Futures,In the field of trust, but the total number of audit projects is still small.,Only a few financial institutions outside insurance are covered by the audit..There is no doubt that the wider the financial audit coverage, the more comprehensive analysis value of the information uncovered and identified, the higher the value that financial regulators can use, the greater the contribution to the effective implementation of the macro-prudential regulatory framework.With the further implementation of macro-prudential regulatory framework, this"Supply and demand gap"Will be more severe.Therefore, financial audit should face up to the current situation of its own audit resources shortage, and apply innovative methods to reverse the adverse situation..

In the short term, the Government,Cross-regional difficult audit projects should be allowed in the Budget premise, make full use of social audit organizational mechanism flexible,Familiar with the situation and strong professional ability and other advantages, to buy audit services, solve the financial audit manpower shortage and professional competency limitations.At the same time, the relevant departments should focus on the construction of long-term mechanism, the central bank and other regulatory agencies to actively promote the formation of cross-industry self-regulation intermediary organizations.The establishment of information platform for abnormal information of financial transactions and defects of internal control by such intermediary organizations can effectively solve the problem that financial audit resources are limited and the audit scope is not wide enough, thus the coverage of illegal audit is insufficient..The information platform is operated mainly by market-oriented means, and its access to information can be diversified. It has both public data directly from various financial units and non-public data obtained by purchase, its operating income can be from the purchase behavior of various information users (including audit organs and financial regulators).In order to ensure the authenticity and integrity of the information, the information users of the platform can entrust the private audit institution to verify its credibility..

Performance Evaluation of the Implementation of the macro-prudential regulatory framework

The foregoing analysis shows that although the financial audit includes,Internal control review,Business Risk Warning,Management Performance evaluation, but did not change the long-term"The proportion of financial audit is higher than that of performance audit."The situation.Performance Audit, which originated from the reform of

government management, is an important part of national governance. The use of performance audit results is conducive to deep investigation and prevention, etc. "Immune Function" Fa

It will help the macro-prudential regulatory framework to operate steadily. Financial Audit from its legal status, In terms of the positioning of responsibilities, we should assume the responsibility. Moreover, audit evaluation is an important part of audit work. The development of audit disciplines and audit work has led to a complete set of rules and technical methods for audit evaluation, these rules and methods can play an important role in the macro-prudential assessment.

In specific operation on national audit organs in addition to implementation-oriented financial supervision institutions of performance audit of the also should be actively explore the macro-prudential supervision framework implementation performance evaluation and audit, efforts construction the service in macro-prudential supervision framework effective implementation of audit evaluation mechanism. Current related department should be positive explore macro-prudential supervision framework run process observation index and run effect prove Index System Application Balance Scorecard principle will leading supervision process "Functional" Defects and Supervision Institutions "Responsibilities" Lack of recognition contact up. According to domestic and foreign mainstream view perfect of macro-prudential regulatory framework should be is functional Supervision Mode. Functional Financial Supervision to financial products the implementation of basic skills can. According of supervision institutions and supervision rules to can effective to solve mixed industry business conditions under Financial Innovation Products of supervision ownership problem, the implementation of cross-Products, Cross-Institutions, Cross-market coordination of Supervision.

Based on Balance Scorecard principle macro-prudential supervision framework implementation performance evaluation can be divided into four dimensions the financial aspects, Customer aspects, Internal operation and learning and growth see Figure 2 Shown in.

Part taking into account supervision institutions perform their duties Assessment, Internal control defects of supervision effect influence more direct so the internal operations give of Weight slightly greater than learning and growth (future can be according to the actual dynamic adjustment weight). From audit evaluation basis or evidence source see the above evaluation system both was auditor provide the data and situation also have be auditor outside of organization or personal provide the data and situation reasonable

Both the internal and external evidence phase combined with the consider.

application and promotion Risk-oriented Audit governance mechanism

It must be noted that in the context of the implementation of China's macro-prudential regulatory framework, systemic risk factors in the economic and financial fields should not be ignored,

Property-based asset bubble, Shadow banking is surging, internet finance is not standard, greatly improving China's systemic risk.

Threat to the development of China's macro economy. 2017 Year 4. General Secretary Xi Jinping pointed out in 40th collective study of the Political Bureau of the CPC Central Committee that the bottom line of systemic financial risks should not be held. These situations show that as one of the responsible parties for the effective implementation of the macro-prudential regulatory framework, the State audit authorities should strictly control the audit risks, especially in the face of Cross-Industry, In the major financial audit projects across departments, we should pay attention to the analysis and assessment of the external environment associated with the audited projects, and audit risk identification and control philosophy throughout the audit process, that is to say, the State Audit organs should strengthen the application of risk-oriented audit model in the field of financial audit, and improve the audit ability and governance mechanism.

As the risk-oriented audit guides the major risk assessment and the whole audit process with the thought of strategy view and System View, the focus of the audit is shifted from the audit test-centered to the risk assessment-centered, in the risk-oriented audit mode, the level of financial audit will be significantly improved, and the

Use Efficiency of audit resources will be changed..In order to adapt to the risk-oriented audit mode, the organization and personnel of the State Audit organs should follow"Target-Risk-Behavior"First of all, a reasonable audit target system is formed based on the characteristics of the audit project,

Sheng yongzhi, Wang Jiahua: implementation of macro-prudential regulatory framework and financial audit coping strategies

Then analyze the risk factors that affect these targets and the controls or activities that can manage these risks, and finally test whether the actual controls or activities can effectively manage these risks?.In the audit process, we should strengthen communication and coordination with financial regulators, pay close attention to high-risk areas, and adjust the audit strategy and identify audit priorities according to the risk assessment results..In practice, the relevant departments should combine the characteristics of different audit projects, constantly explore and innovate the associated environmental factors risk assessment methods of audit projects, and constantly train and cultivate the ability of financial data analysis and mining..

(4) innovative forms of coordination between financial audit and financial regulators

The practice of the coordinated development of financial supervision and audit in China has proved that the two have common goals in the face of major illegal and illegal issues in the financial field, it's just a different role and process and method to do the work..Cooperation between the two highlights the advantages of Government Audit Model with Chinese Characteristics.Summarized to said financial audit and Financial Supervision Coordination content General including:Audit Process in by exercise"To the assistance right"Implementation Audit processing behavior and regulators processing and punishment phase coordination;Supervision Process in by use audit results get supervision efficiency and effect.In macro-prudential supervision framework under government audit and financial supervision cooperation more closely related department should be in consolidate existing coordination the Form Based on continue to explore new of Coordination content and form.For example of cross-industry,Major trans-regional audit project early project and audit draws should be in financial regulators appropriate involved in. The this can science arrangements audit range and time provide security; for audit forensics difficult or subject audit cost factors such as in the project should be consider regulators check copy or from regulators prove your files of availability; for audit judgment difficult to quantitative results of wrong disadvantages, should be considerThe 《Audit information referenceOfOr other form transfer regulators to regulators perfect supervision behavior; for in tracking rectification results stage of audit project, should be brought to regulators be special attention, will part tracking of was Audit Unit rectification work task be decomposition allow regulators use its responsibilities convenient be Assist complete.

(Five) precision and supervision financial field Violation Behavior

Need to pay attention to of is national audit organs from involved in national governance and maintenance financial stability purpose based in promote and security macro-prudential supervision framework effective implementation of the same time also should pay attention to use"Immune System"Of governance concept and its authority,Comprehensive,Professional advantage constantly strengthen its in financial micro field precision and Regulation Violation Behavior of Ability.This is because macro-prudential supervision framework main focus on data Red Line Monitoring and Abnormal Fluctuation management is still can't effective to deal with micro individual illegal violations problem of early found and precision recognition less than a of problem so, in macro-prudential supervision framework under the background of the implementation of the micro subject prudent management of supervision task not reduce the and should be is more heavy..The financial field illegal violation behavior exposing on financial audit to constantly sound and development financial audit technology widely use cloud computing Audit,Big Data Analysis Technology,Off-site audit technology constantly strengthen the typical,Budding sexuality,Tendency financial fraud and illegal violation behavior of precision recognition and effective against and Tracking Management.

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