

# End-to-End data lineage

Building trust and powering reliable  
reporting

May 2025

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# 01

## Background



The 2008 Global financial crisis reshaped regulatory oversight, compelling banks to meet stricter capital, leverage, and liquidity requirements. However, beyond the financial resilience, the crisis also highlighted the gap that existed in the information technology and data architecture of the banks, which were inadequate to support broad management of financial risks. In response, the Basel Committee on Banking Supervision (BCBS) introduced the BCBS 239 framework in 2013<sup>1</sup>, establishing principles for risk data aggregation and reporting to enhance the risk management and decision-making processes in banks.

Over the past decade, regulators have consistently emphasized the need for robust regulatory reporting through their publications and reviews being performed by skilled persons to assess the accuracy of banks' returns and opine on their governance and controls.

In their recent publication, 2025 priorities, the Prudential Regulation Authority (UK PRA) points out that poor data continues to be a root cause in a number of risks requiring remediation within firms<sup>2</sup>. It expects firms to continue to improve their ability to aggregate data to support holistic risk management,

robust Board decision-making, and accurate regulatory calculations. The PRA also confirms it will continue to use the full set of its supervisory tools, including Section 166 reviews, to determine progress is being made.

In the light of these expectations, one of the key priorities for banks remains data management- focusing on understanding and identifying risks associated with how data is collected, used, stored, and shared, as well as how it is protected from misuse. Data governance, data lineage, data quality and technological advancements are set to be central pillars of banks' evolving data frameworks.

This document highlights the importance of data lineage, the associated challenges, emerging trends, and the way forward for global banks and their global capability centers (GCCs) in India.

<sup>1</sup> BCBS 239

<sup>2</sup> International banks Supervision: 2025 priorities BOE PRA

# Effective data management



Data management is the foundation of how an organization creates, stores, uses, and shares data effectively. It involves defining systems, processes, and standards to guide data through its entire lifecycle. A key part of this journey is data governance, which fosters data accuracy, security and proper handling.

Successful data management requires collaboration between IT teams, business teams and subject matter experts. A Chief Data Officer (CDO) can guide these efforts by managing data projects in an organization and lead the cultural change that enables a strategic approach to data. Together, they build a data environment that supports transparency, integrity, and trust.

To implement a successful data governance program, below are a few points to consider<sup>3</sup>:

- Documenting data dictionaries to create a repository of the organization's metadata
- Documenting data lineage to track the origin, movement, and transformation of data through its lifecycle
- Determining existing controls and establishing new controls to enhance data quality and integrity

Financial institutions must execute data governance on all data sets or individual data elements that are used in key business processes, support critical reports, and have potential financial, regulatory, or reputational risks involved if the data was inaccurate or compromised.

## 2.1

### Data dictionaries and metadata

Data dictionaries and metadata are foundational elements in modern data governance as they provide critical context that helps organizations manage and trust their data.

A data dictionary defines the structure and content of data sets, often for a single database, application, end-user computing (EUC) tool or data warehouse. The dictionary is used to manage the metadata - names, descriptions, structure, characteristics, storage requirements, default values, relationships, uniqueness, and other attributes of every data element in a model. Simply put, a data dictionary is a centralized repository of metadata, and the metadata is the data about data<sup>3</sup>.

Types of metadata:

#### 01 Business metadata

Business metadata focuses on the meaning, purpose, and usage of data from a business standpoint.

It offers non-technical definitions of concepts, entities and attributes and supports data governance by ensuring clarity and consistency across organization.

Examples include definitions, business rules, transformation logic, data quality standards, data lineage, ownership, and known data issues.

#### 02 Technical metadata

Technical metadata provides detailed information about the structure, storage, and movement of data across systems and is essential for IT teams.

Examples include physical database structures, column names and properties, access permissions, object properties, schema definitions, documented relationships between the data models and the physical assets.

<sup>3</sup> DMBok - Data Management Body of Knowledge

## 2.2

### Data lineage

Data lineage refers to the process of tracking the flow of data across an organization's systems and EUCs, from its point of origin to its final use. It provides a clear visual representation of how data moves, transforms, and interacts within various processes and systems. For data lineage to be effective, it should be integrated with the metadata, data quality initiatives and data governance frameworks.

Successful data lineage requires both these perspectives<sup>3</sup>:

- **Business focus:** Tracing back data elements critical to business from target systems or reports (for example, regulatory or financial reports) to original sources. When combined with data quality metrics, the insights help stakeholders identify where data accuracy or integrity is impacted.
- **Technical focus:** Beginning at the source and following data forward through each source of processing and usage, it enables technology teams to assess the impact of potential changes and any anomalies.

By aligning both these perspectives, data lineage empowers organizations to troubleshoot issues, optimize data flows and strengthen compliance.

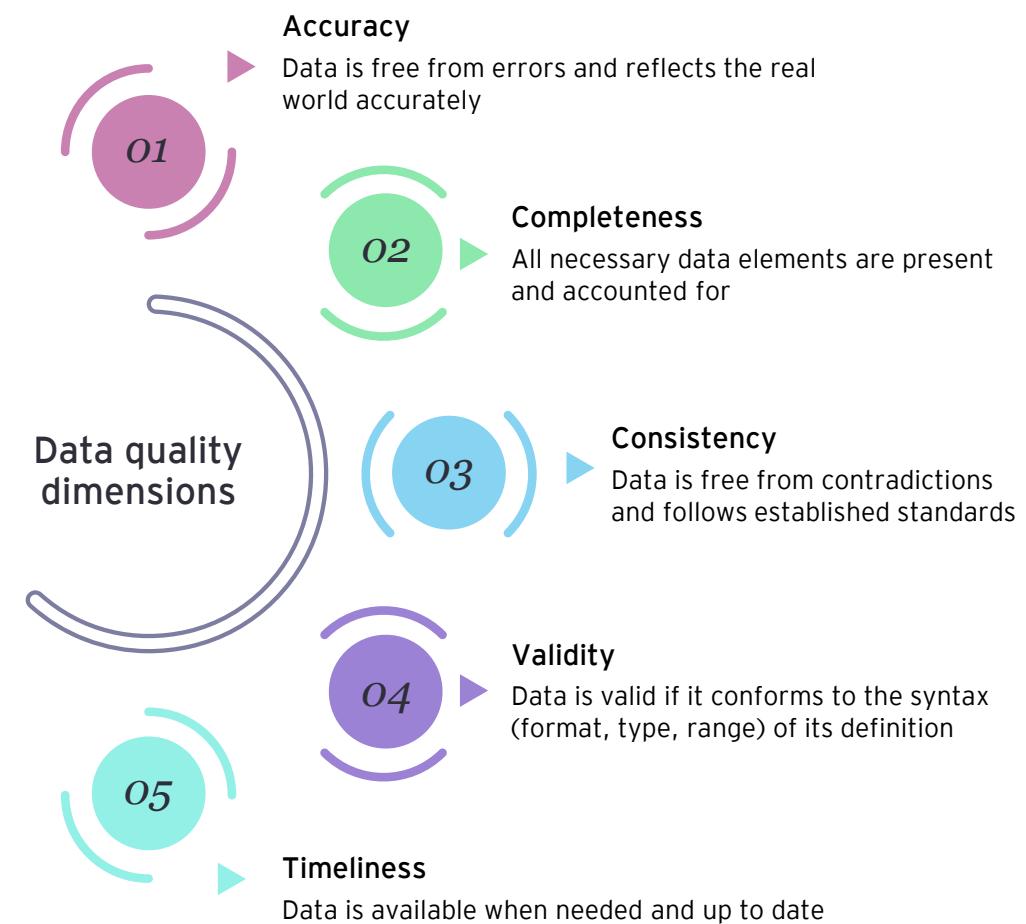


## 2.3

### Data quality

Data quality is another foundational element of effective data governance, ensuring that information is accurate, complete, consistent, and reliable for business use, i.e., it is fit for purpose based on data consumers requirements. Building data quality involves applying standards, validation rules and cleansing techniques to minimize errors and inconsistencies.

A key aspect of assessing and improving data quality lies in evaluating it across defined data quality dimensions that provide measurable attributes<sup>3</sup>.



<sup>3</sup> DMBoK - Data Management Body of Knowledge

# Decoding data lineage

## 3.1

### Key steps in implementing data lineage

Data lineage requires documenting the origin of data, as well as their movement and transformation through systems where they are accessed and used. There are several steps involved in this process. Below is a detailed guide covering all the key steps in data lineage implementation:

#### 01 Identify data sources

This involves creating a comprehensive inventory of all data sources within the organization, which may include databases, applications, EUC tools, manual inputs, and external feeds. This can be achieved by collaborating with business and technical teams to gather insights into how they generate and utilize data.

#### 02 Identify critical data elements

Not all data holds the same level of importance for the organization. The organization needs to identify the data elements that are deemed critical by applying criteria of materiality, role in regulatory or financial reporting, extent of usage across different teams or impact on business operations. By doing so, the organization can concentrate its time and resources on the most significant data elements.

#### 03 Establish relationships between data elements

Identify how data elements interact and traverse through various processes and systems within the organization. For example, deep diving into data transformations at various stages in a data warehouse that is based on the concept of the ETL- Extract, Transform, and Load.

#### 04 Gather and document the metadata

This involves documenting various metadata attributes like data ownership, definitions, underlying sources and applications, data type, logical names that are meaningful to business users, business context, etc., for each critical data element identified.

#### 05 Create visualization in lineage tools

The process of connecting the pieces of data lineage is called stitching. This results in a holistic visualization of the data, its metadata, and its journey from source to its final destination. Organizations use various visualization tools, for example, Solidatus, Informatica, Collibra, and Alation, for creating graphic data flow diagrams.

#### 06 Establish data quality controls

This involves collaborating with data stewards and business teams to establish data quality standards and robust controls (for example, validation rules, reconciliation checks, etc.) around entire data flow, ensuring its integrity and accuracy.

#### 07 Regularly review and update

Regularly monitor and update your data lineage to incorporate any changes in the data flow, data sources, transformations, and changes in regulatory requirements, etc.

<sup>3</sup> DMBoK - Data Management Body of Knowledge

## 3.2

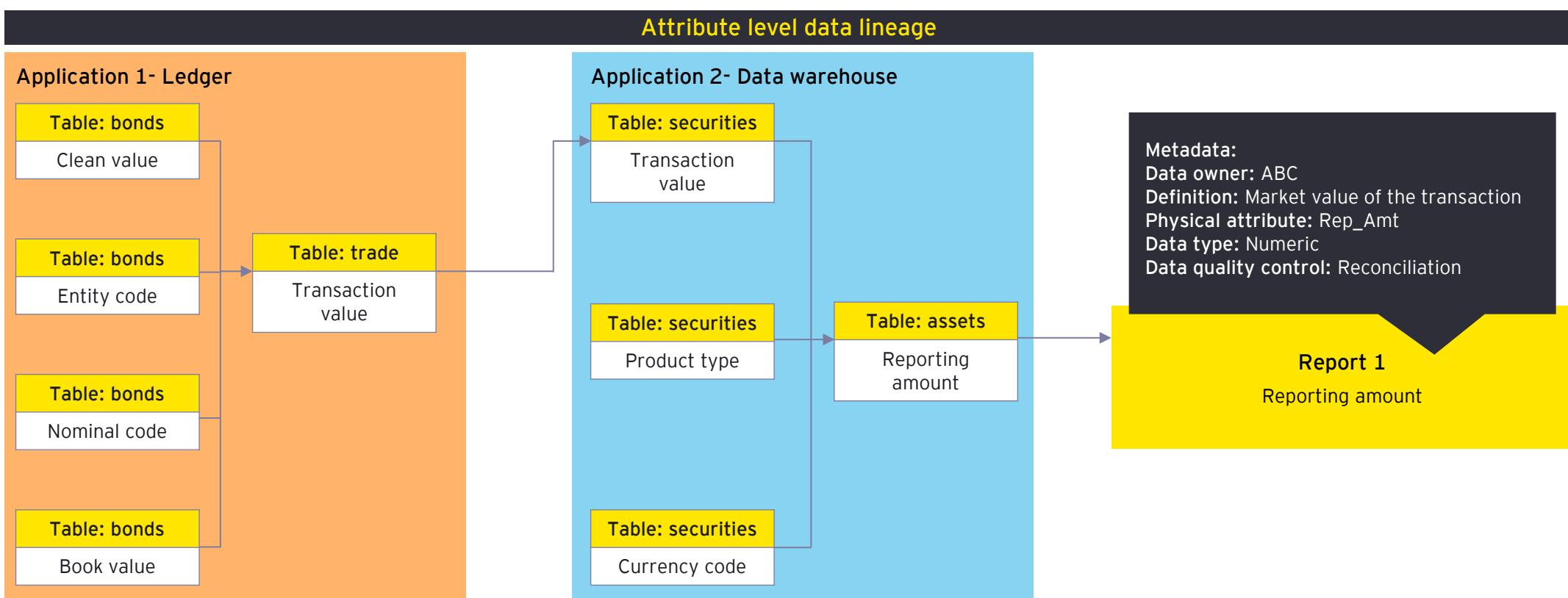
### Seeing data in motion

The goal of data lineage is to turn data into information and information into insight. This is possible through data lineage tools that help visualize the data flows graphically. Data flows can be documented at different levels of detail:

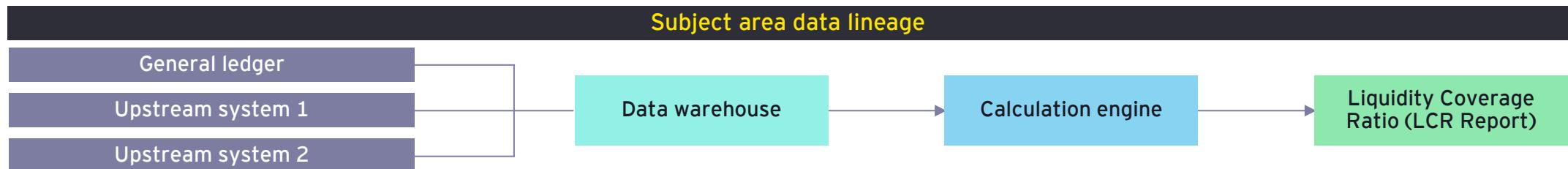
- **Subject area:** Capturing data flows for a specific regulatory report or submission
- **Business entity:** Capturing data flows for a specific entity across functions
- **Attribute level:** Capturing data flows for a specific data element across systems and reports
- **System or application level:** Capturing data flows across different systems or applications

Below are a few examples of such visualizations:

This illustration provides a detailed representation of the data lineage of an individual data element level - Transaction value - highlighting how specific data attributes flow and transform across systems to support reporting requirements.

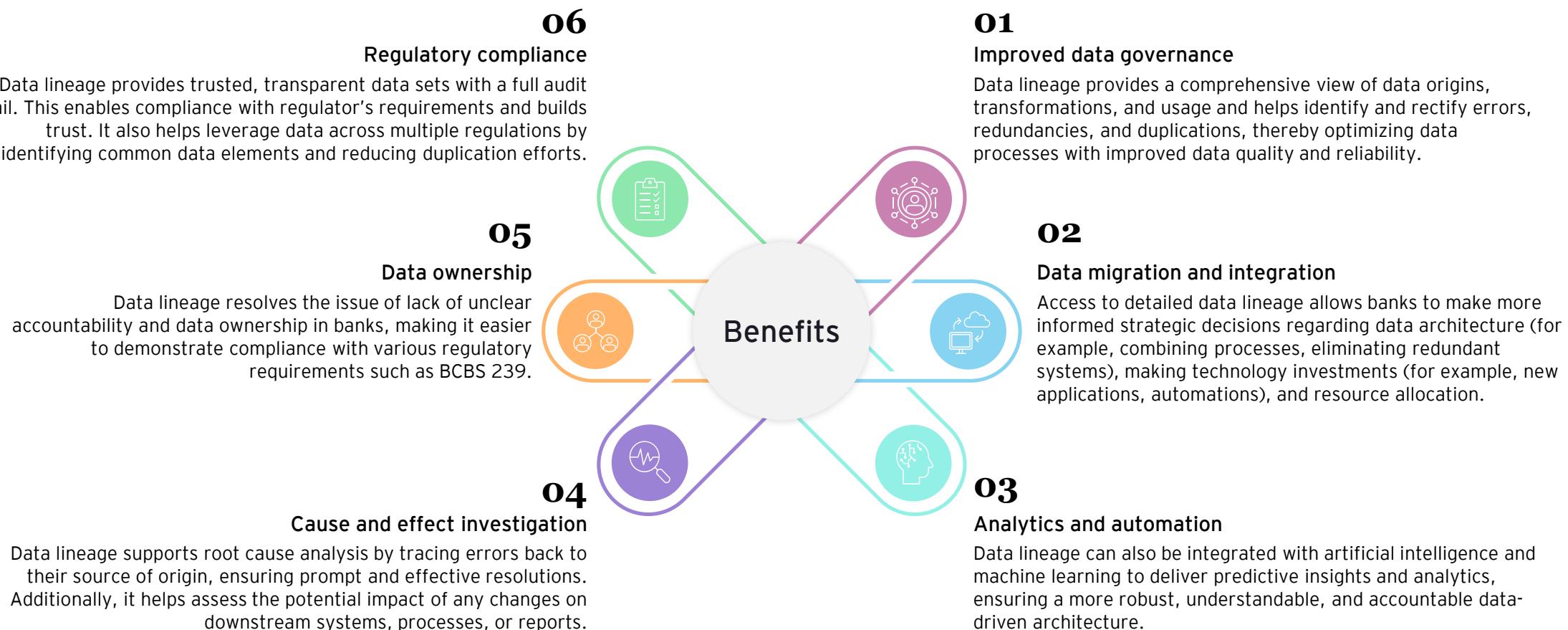


The illustration below provides a high-level data flow at a subject area level - for liquidity coverage ratio report - depicting the journey of all the data sources involved in producing the final reporting outputs.



### 3.3

#### Benefits of data lineage implementation



Data lineage supports root cause analysis by tracing errors back to their source of origin, ensuring prompt and effective resolutions. Additionally, it helps assess the potential impact of any changes on downstream systems, processes, or reports.

## 04

# Overcoming challenges in implementation

Achieving end-to-end data lineage is challenging but essential for compliance, risk management, and operational efficiency. Financial institutions that invest in automation, governance, and proactive monitoring can transform data lineage from a regulatory burden into a strategic asset.

Below are some of the challenges that banks observe in implementing data lineage. By overcoming these challenges banks can improve reporting accuracy, and drive business success in an increasingly data-driven world.

Areas	Challenges	How can banks address them?
Defining the scope of the Data Program	<b>Unclear boundaries</b> - Determining which entities, business units, and external reports should be included can be complex.	A centralized data governance function regulated by the CDO and data stewards may agree on the scope of entity inclusion and external reports across business units.
	<b>Regulatory compliance</b> - The requirements can vary across regions, making it difficult to standardize processes.	Data stewards across functions may consider <b>collaborating and leveraging information</b> to avoid any redundancies and duplication of efforts in documenting data dictionaries and data lineage.
	<b>Competing priorities</b> - Different upstream and downstream departments may have conflicting views on data lineage priorities.	Foster a <b>collaborative planning approach</b> to prioritize data lineage efforts across compliance, IT, and business units.
	<b>Lack of ownership</b> - Unclear data ownership and accountability can hinder decision-making.	Create <b>clear data stewardship roles</b> to encourage accountability and streamline decision-making.
Legacy systems and data silos	<b>Lack of interoperability</b> , hinders integration between old and new technologies.	Leverage <b>middleware</b> or Application Programming Interface ( <b>APIs</b> ) to facilitate seamless integration between legacy and modern technologies.
	<b>Unstructured data</b> like manual reports, emails, screenshots used in data processing present a significant challenge for data lineage.	Leverage advanced <b>data mapping tools and artificial intelligence</b> to establish robust data management on unstructured artefacts enabling better tracking and understanding of these data sources.



Areas	Challenges	How can banks address them?
Labor-intensive without automation	<b>Manually documenting</b> and tracking data flows, transformations and dependencies is time consuming and prone to errors.	Using <b>data lineage tools</b> that provide an open API, read SQLs and utilize artificial intelligence to automatically track, store and visualize data lineage can reduce the manual intervention.
	Lack of standardization leads to <b>inconsistent documentation</b> .	Implement <b>organization-wide data documentation standards</b> to build consistency in lineage records.
Ever-evolving processes and data flows	<b>Frequent data pipeline changes</b> disrupt lineage continuity.	Develop an <b>operating model</b> to periodically review changes in the data pipeline management frameworks and adapt the changes into the lineage.
	<b>New data sources</b> and integrations increase documentation complexity.	Establish <b>scalable documentation practices</b> at implementation stage for new systems to enable ease of documenting the metadata and lineage.
High costs	<b>High implementation costs</b> for tools and infrastructure.	Adopt <b>cloud-based lineage solutions</b> to reduce initial costs and scale with the organization's needs.
	<b>Ongoing costs</b> incurred for manually maintaining data lineage documentation.	Use <b>automated data lineage tools</b> to reduce manual documentation updates and lower maintenance costs.
Complexity of documentation	Mapping <b>complex data transformations</b> across multiple platforms requires both functional domain and data expertise.	Collaborate with <b>IT teams and data SMEs</b> to perform mappings, in addition to this firms could also invest in <b>AI-driven tools</b> (for example, Alation, Informatica etc.) to automate and simplify lineage mapping.
	<b>End-User Computing (EUC) tools</b> , particularly Excel workbooks, are often used for ad-hoc analysis and adjustments, leading to data silos and inconsistency.	Establish a <b>governance framework for EUCs</b> to include monitoring the EUC inventory for changes, integration of EUCs with centralized data platforms, designing effective controls to avoid any errors. Additionally, use tools that automate the tracking of data flows in EUCs.



# Essential features in a data lineage tool

A data lineage tool is vital for banks aiming to improve data governance and compliance. It offers a clear view of data flow, enabling users to track the origins and transformations of data across systems. Here we have covered a few key features that we believe would be beneficial in a data lineage tool:

## Automated end-to-end real-time lineage

The tool automatically identifies and maps the sources of data, transformations, and data flows by connecting to various data sources without manual input. This process enables real-time updates of data maps and other lineage documents, ensuring that the most current information is always readily available. As a result, data becomes available in a timely manner and is less susceptible to errors, as it eliminates the need for manual intervention.

## Dynamic visualization of data maps for ease of understanding

This involves utilizing interactive visual representations, such as process maps and diagrams, to illustrate the movement and transformation of data across various systems, tools, and processes. Such visualization simplifies the understanding and analysis of complex data flows, creating a more intuitive and user-friendly experience.

## Mapping of various metadata attributes

A key feature in a data lineage tool is the ability to integrate various metadata attributes such as risk, privacy sensitivity, ownership, data quality controls, etc. This integration offers vital context to the data flow. By associating these attributes with data as it progresses through its lifecycle, banks can bolster data governance, improve compliance, and maintain high data quality.

## Multiple views and filters

An effective data lineage tool offers multiple views and filtering capabilities to improve user experience and streamline data analysis. This could include keyword search functionality, enabling users to refine their searches based on criteria like data type, source, destination, and more. It should also provide a data element-level view, illustrating how data is sourced and transformed, as well as an application-level view, showing how different applications interact with the data.



## ● AI-powered analytics

The platform should empower business users to access and analyze data independently. Using AI to perform validation checks, provide insights, highlight inconsistencies, automate data quality checks, and suggest improvements in data governance.

## ● Data privacy and security

The data privacy and security features of a data lineage tool are essential for protecting sensitive information and ensuring compliance with regulations. These features may include:

### Access controls

Role-based access controls to restrict who can view or manipulate data lineage information

### Data masking

Utilizing data masking techniques to obscure sensitive information in visualizations

### Audit trails

Maintaining audit logs that track changes and access to data lineage information

### Encryption

Encryption of data to protect information from unauthorized access during storage and transmission

## ● Periodic reviews and sign-offs

An efficient data lineage tool should enable users to schedule regular reviews of data lineage such that data flows and transformations are accurately documented and remain current. Users should receive automatic alerts on approaching reviews, and reviewers should have the capability to assess and provide sign-off on the data lineage documentation directly within the tool. It should also be capable of generating reports on the status of reviews and signoffs, assisting management in understanding compliance levels and identifying areas that require attention.

These features can significantly enhance the effectiveness of a data lineage tool, making it more valuable for banks looking to manage their data effectively.



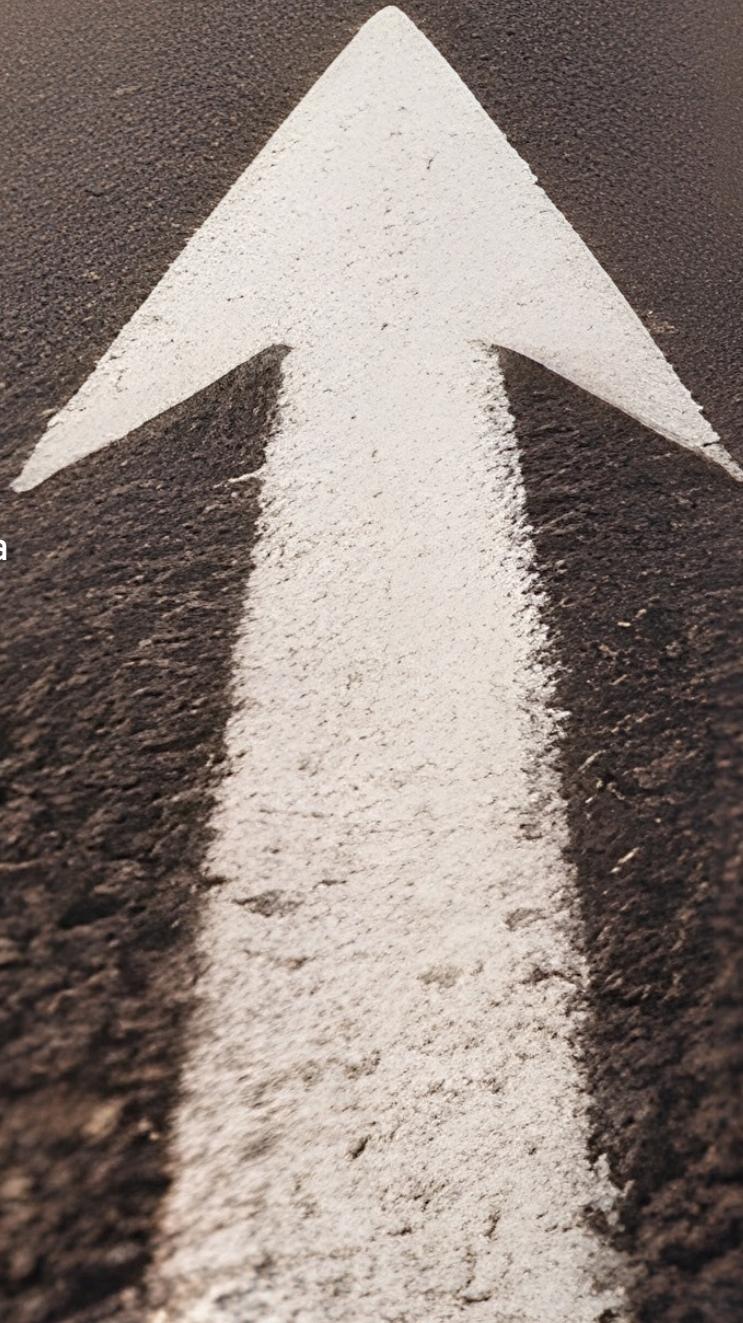


## 06 The road ahead

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As banks navigate the complexities of an evolving data landscape, data lineage is emerging not only as a regulatory necessity, but also a pivotal strategic asset. The foundational elements – spanning from lineage capture to visualization – have laid the groundwork. However, unlocking the true potential of data lineage demands a visionary approach that extends beyond compliance to drive innovation and value creation.

To achieve this, banks must align their data lineage strategies with emerging industry trends, advanced enterprise use cases and technological advancements. The next stage in this journey calls for scalability, automation, and seamless integration with broader data governance frameworks and business transformation initiatives. In the section below we outline our perspective on how banks can shape and accelerate their data management roadmap.





## Adopting scalable, automated lineage frameworks

Manual data lineage efforts are resource-intensive and prone to errors. To scale lineage management efficiently, banks can leverage AI-powered, metadata-driven automation tools that reduce costs, enhance accuracy, and allow continuous updates in dynamic ecosystems. As businesses adopt emerging technologies like data mesh, cloud-native platforms, and advanced analytics, lineage solutions must evolve to support decentralized architectures, real-time data flows, and interoperability across hybrid environments.

1

2

4

3

### Empowering employees through data literacy

Banks need to prioritize employee trainings to embed data management practices across the organization effectively. Every employee, from the Chief Data Officer (CDO) to a front-line employee, plays a vital role in identifying data risks and ensuring compliance with governance standards. Regular training sessions and clear communication about data management policies and procedures not only fosters accountability but is also essential to keep employees informed and aware of their responsibilities, ensuring an ongoing compliance and overall data quality.

### Integrating data practices enterprise-wide

To sustain momentum and establish robust data management, it is essential for banks to create a well-defined operating model to cultivate data practices across all levels. This requires moving beyond IT and compliance silos to foster a "lineage-first" mindset among business users, data stewards, and decision-makers. A structured operating model should outline a clear framework defining roles, responsibilities, ownership, processes in scope, review frequency and overall data policies ensuring a seamless integration of data lineage and data management practices across the enterprise, driving the banks long-term governance goals, and promoting better data ethics.

3

### Cultivating data stewardship practices

Data stewards are the backbone of data governance. Banks must establish a robust structure that empowers data stewards to fulfil their critical role in data governance. This includes formalizing their responsibilities, such as managing the business glossary, ensuring alignment of business terms, addressing data quality issues, and maintaining regulatory compliance. Providing them with the right tools, cross functional collaboration frameworks, and decision-making authority is essential. Additionally, banks should invest in training, standardized data quality policies and audit readiness support to enable data stewards to drive consistency, compliance, and value across data assets effectively.



5

### Building transparency through data traceability

While banks emphasize data lineage to understand the flow and transformation of data, equal focus is needed on data traceability. Data traceability is the process of evaluating whether the data is following its life cycle as expected. It is particularly crucial during system upgrades or interface replacements to confirm seamless integration without disruption. It also supports regulatory audits by demonstrating visibility and regulatory alignment across the entire data lifecycle.

6

### Simplifying data ecosystems

Banks should prioritize reducing their reliance on EUCs, especially Excel spreadsheets by embracing automation. EUCs often rely heavily on manual processes, increasing risk of errors while complicating data lineage tracking. Moreover, banks should focus on leveraging AI-driven solutions to streamline any unstructured data. This will help banks streamline their operations, improve data quality, and alleviate the burden on data lineage tracking.

7

### Ensuring audit preparedness

Banks should prioritize audit readiness by preparing for skilled personnel reviews and regulatory exams. This includes maintaining comprehensive documentation, adhering to established data quality and lineage standards and undergoing regular reviews with internal audit. Internal audit plays a critical role in assessing the effectiveness of data governance framework, detecting compliance gaps, and identifying any inefficiencies thereby helping banks to align with the regulatory requirements.

8

### Setting up governance forums and feedback loops

Governance forums and working group meetings play a crucial role in ensuring the effectiveness of data governance models and architectures. It is important to assess how well the data governance model aligns with existing architecture and data standards. To enable comprehensive evaluation, governance forums should involve a diverse group of subject matter experts, data stewards, CDO, and IT experts, each bringing different backgrounds, skills, expectations, and opinions. This collaborative approach will help refine the data governance model and enable implementation of best practices.

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