

DORA – Mapping critical or important functions and ICT services supporting those functions

STEP 1



Identify the ‘critical or important functions’ of the financial institution

- 1 Start with functions that have been identified under existing regulatory frameworks, as applicable:
 - ‘critical or important’ under the EBA Outsourcing Guidelines, MiFID II or Solvency II;
 - ‘critical’ under the BRRD.
- 2 Consider (other) functions that meet the broad DORA definition:

Functions that, if disrupted, would materially affect:

 - the **financial performance** of the financial institution;
 - the **quality** of its services and activities; or
 - its ability to **comply** with regulatory obligations.

Certain functions/services exempt from existing outsourcing rules may not be exempt from DORA.

✓ In scope ‘critical or important functions’ under DORA



STEP 2



Identify the ICT services that support those critical or important functions

‘ICT services’ includes digital and data services provided through ICT systems to one or more internal or external users on an ongoing basis, including hardware as a service and hardware services which includes the provision of technical support via software or firmware updates by the hardware provider, excluding traditional analogue telephone services. Those ICT services used in the operation of the critical or important function would be in scope.

✓ In scope ICT services supporting the critical or important function



STEP 3



Consider the application of proportionality

The proportionality principle prescribes the implementation of DORA by taking into account the institution’s size, risk profile, and the complexity of its services, activities and operations.

In applying proportionality, ICT services that support a certain critical or important function may be categorised into different categories based on a materiality assessment of each those services, and receive a different treatment in the implementation of DORA.

✓ Proportionality-based categorisation of ICT services supporting a critical or important function

Our Benelux DORA team is happy to answer any questions



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