

DORA – Register of Information Key Insights

As part of the Digital Operational Resilience Act (DORA) third party risk management requirements, Financial Entities (FEs) subject to DORA are required to maintain and update a register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers. This series focuses on the practical steps firms can take to prepare, review and submit the Register of Information in advance of the upcoming deadline.

FEs subject to the DORA regulation will be required to submit their Register of Information (RoI) via their National Competent Authority (NCA). For FEs regulated by the Central Bank of Ireland (Central Bank), the RoI will be due for submission via the Central Bank Portal during the submission window of 1 to 4 April 2025. The NCAs are then due to submit the RoI to the European Supervisory Authorities (ESAs) by 30 April 2025 for the purposes of designation of critical ICT third party providers under DORA.

Given the extensive volume of information on the European Banking Authority (EBA) website, we have prepared a summary of key outcomes from the 'Frequently asked question on reporting of the registers of information' file at **DORA – ROI FAQ Summary – What Financial Entities Need to Know** and we have prepared a practical step by step guidance to support with submission of the RoI at **DORA – ROI Guidelines for Effective Submission**.

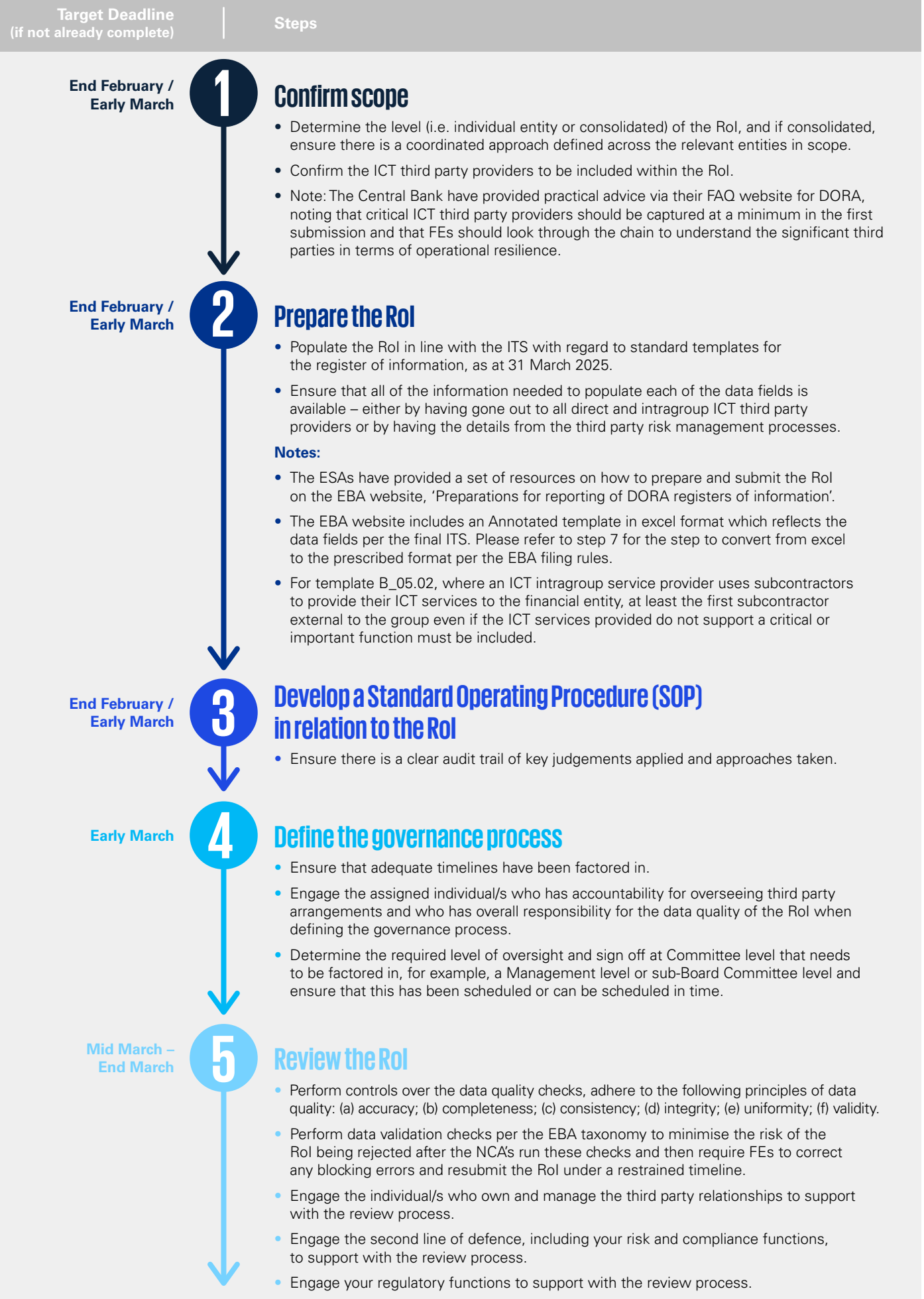
With the deadline for submission fast approaching, in just under a month, FEs are busy populating the RoI and developing their review and submission process. Organisations should not underestimate the time required to develop, prepare and review the RoI in preparation for submission.

Containment of Data

The RoI should contain all data for active ICT service providers and subcontracting arrangements as per the Implementing Technical Standards (ITS) with regard to standard templates for the register of information, as at the 31 March 2025. Annexes I to IV of the ITS contains detailed instructions for completing the RoI, including the list of type of ICT services and their description, the list of activities by type of entity, and instruction to report the total value of assets (per tab B_01.02).



High-level timeline of steps to help support the smooth submission of the RoI:



High-level timeline of steps continued.

Target Deadline (if not already complete)	Steps
End March	6 Approval of the Rol <ul style="list-style-type: none">Obtain overall review and approval sign offs from assigned individuals / Committees in line with the agreed governance pathway.
1 – 4 April	7 Submission of the Rol <ul style="list-style-type: none">Note: The ESA's have not issued an updated version of the tool based on the final version of the Rol to run validation checks and convert files to the prescribed format as required by the EBA filing rules.Collate the overall reporting file in preparation for submission in line with EBA filing rules.Aim for early submission within the reporting period to ensure there is enough time to correct should anything be wrong.Keep an eye on the Central Bank website for instructions to the portal.



How can KPMG help?

KPMG has a dedicated Technology Risk Consulting team who works with small, medium and large organisations across the financial services sector to provide a range of different services. This includes extensive DORA design and implementation experience as well as ensuring firms have the appropriate systems, policies, procedures and controls to support compliance with regulatory expectations and requirements.

We can help you with various aspects of your DORA journey, including:

- In relation to the Rol, provide training and consultation with the preparation, review and submission of the Rol.

- More broadly, we can also:

- Assist with the design and implementation of the ICT Risk Management Framework and supporting documents in place to comply with DORA.
- Provide an independent review of FEs DORA programme as well as deep dives across specific DORA areas.
- Provide accessible insights relating to compliance with DORA.
- Develop and facilitate training sessions on DORA to promote understanding and improve implementation.
- Develop a target operating model to support your DORA programme transition into BAU.
- Advise on assurance and compliance models to ensure continued DORA compliance.



Contact our team

If you would like to discuss how KPMG can provide guidance and support on your DORA compliance journey, please get in touch with our Technology Risk Consulting Team below. We'd be delighted to hear from you.



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