



# **Antony Bream**

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## DORA is in Force from **Jan 16<sup>th</sup>, 2023**

Technical Standards by **June 2024** 

2 Year implementation

**Period** – Jan 17<sup>th</sup>, 2025

### **DORA Regulation:**

5 pillars , 64 sections , 79 pages

#### What Needs To Be done:

- Write Operational and Cyber Policies;
- Create Processes for CBS and Map Resources;
- Analyse data from tools for Risk Management, Cyber, Third-Party Assessment, Incident management etc...
- Share incident report with Regulator
- Conduct internal audits and be prepared for regulator inspections
- Inventorise, monitor and exit plans for 3<sup>rd</sup> Party Suppliers

Steep Penalty – Penalty calculation yet to be finalised by authorities (similar to GDPR @ 4% global revenue) + public call outs

ICT providers – 1% of average worldwide turnover

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#### **ICT RISK MANAGEMENT**

The management body of a financial entity is required to define, approve, oversee, and be accountable for the implementation of all arrangements related to the ICT risk management framework



#### **ICT RELATED INCIDENT MANAGEMENT**

Financial entities are required to establish and implement an ICT-related incident management process to detect, manage, and notify ICT-related incidents and shall put in place early warning indicators as alerts

## 5 PILLARS OF DORA

5 INFORMATION
SHARING
ARRANGEMENT

Financial entities may exchange among themselves cyber threat information and intelligence, including indicators of compromise, tactics, techniques, and procedures, cyber security alerts, and configuration tools

MANAGING OF ICT THIRD PARTY RISK

Financial entities shall manage ICT third-party risk as an integral component of ICT risk within their ICT risk management framework and in accordance with key principles for ICT third-party risk management issued by the regulatory authority.

DIGITAL OPERATIONAL RESILIENCE TESTING

Financial entities are required to establish and implement a testing program that considers a wide variety of tests limited not to IT systems but also to process and people.

#### **ICT Risk Management**

#### **SECTION I**

Article 5 – Governance & Organisation

#### **SECTION II**

- Article 6 ICT Risk Management Framework
- Article 7 ICT Systems, Protocols and Tools
- Article 8 Identification
- Article 9 Protection and Prevention
- Article 10 Detection
- Article 11 Response and Recovery
- Article 12 Backup Policies and Procedures, Restoration and Recovery Procedures and Methods
- Article 13 Learning and Evolving
- Article 14 Communication
- Article 15 Further Harmonisation of ICT Risk Management Tools, Methods, Processes & Policies
- Article 16 Simplified ICT Risk Management Framework

#### ICT Related Incident Management, Classification & Reporting

- Article 17 ICT Related Incident Management Process
- Article 18 Classification of ICT Related Incidents and Cyber Threats
- Article 19 Reporting of Major ICT Related Incidents and Voluntary Notification of Significant Cyber Threats
- Article 20 Harmonisation of Reporting Content & Templates
- Article 21 Centralisation of Reporting of Major ICT Related Incidents
- Article 22 Supervisory Feedback
- Article 23 Operational or Security Payment Related Incidents Concerning Credit Institutions, Payment Institutions, Account Information Service Providers and Electronic Money Institutions

#### **Digital Operational Resilience Testing**

- Article 24 General Requirements for the Performance of Digital Operational Resilience Testing
- Article 25 Testing of ICT Tools and Systems
- Article 26 Advanced Testing of ICT Tools, Systems and Processes based on TLPT
- Article 27 Requirements for Testers for the Carrying out of TLPT

#### Managing of ICT Third Party Risk

DORA 5

**PILLARS** 

#### SECTION I KEY PRINCIPLES FOR A SOUND MANAGEMENT OF ICT THIRD PARTY RISK

- Article 28 General Principles
- Article 29 Preliminary Assessment of ICT Concentration Risk at Entry Level
- Article 30 Key Contractual Provisions

#### SECTION II OVERSIGHT FRAMEWORK OF CRITICAL ICT THIRD PARTY SERVICE PROVIDERS

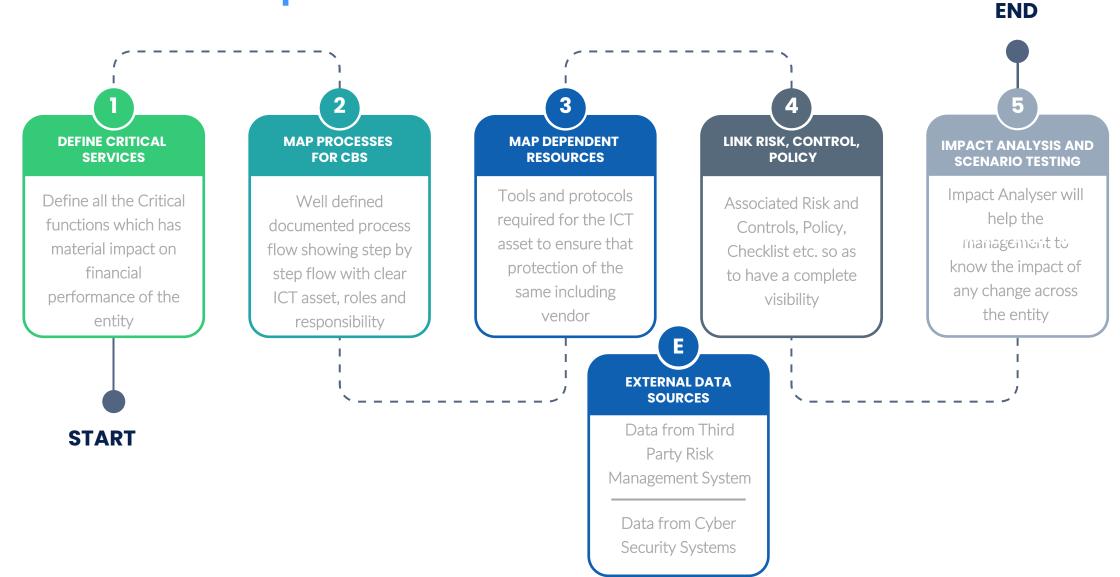
- Article 31 Designation of Critical ICT Third Party Service Providers
- Article 32 Structure of the Oversight Framework
- Article 33 Tasks of the Lead Overseer
- Article 34 Operational Coordination Between Lead Overseers
- Article 35 Powers of the Lead Overseer
  - Article 36 Exercise of the Powers of the Lead Overseer Outside the Union
  - Article 37 Request for Information
  - Article 38 General Investigations
    - Article 39 Inspections
    - Article 40 Ongoing Oversight
    - Article 41 Harmonisation of Conditions Enabling the Conduct of the Oversight Activities
    - Article 42 Follow-up by Competent Authorities
    - Article 43 Oversight Fees
    - Article 44 International Cooperation

#### **Information Sharing Arrangements**

 Article 45 – Information Sharing Arrangements on Cyber Threat Information and Intelligence

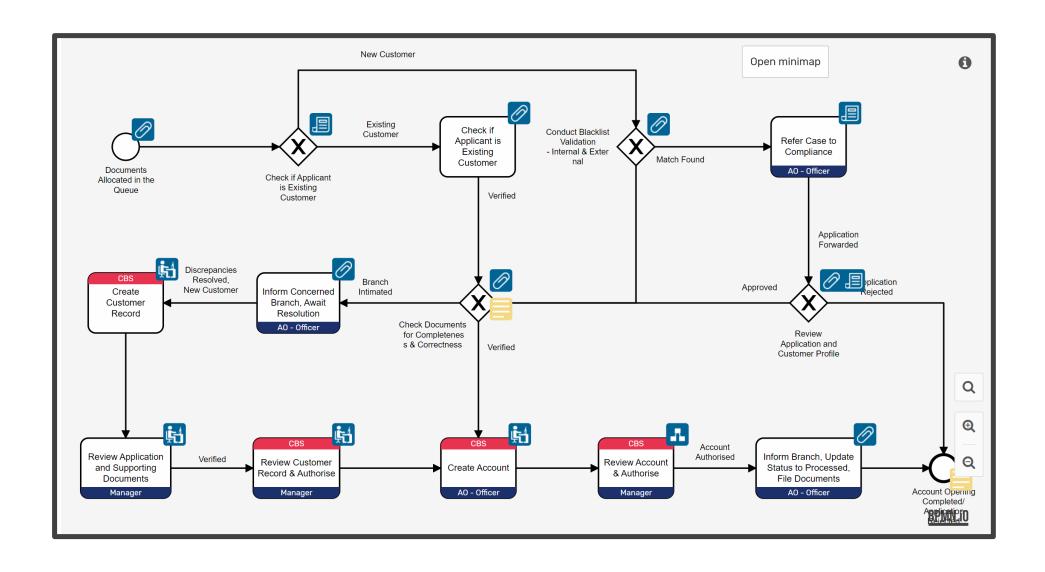
# | Dora360 Continuous Monitoring of Critical Business | Services Roadmap







## Visualise Critical Business Services and Map Resources



## **Attach All DORA Assets To The Critical Business Process Map**



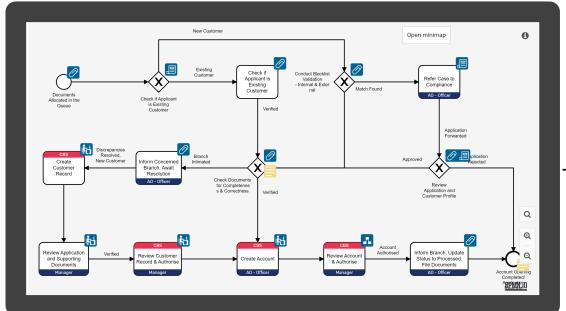
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Article to Article Linkage
(Pre-created control repository linking tech
standards to multiple articles)



Policy Repository (link policies to procedures)





TPRM – identify third parties from critical processes, categorise and market scan





MAGPIE (Gen AI) - compare existing documents with regulatory clauses to generate coverage report

Incident Reporting- Report incidents on critical services and create mitigation plan. Report to central bank as per rule

## dora360 Compliance Dashboard - Single Pane of Glass

Clause Description

Clause

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Article 6.1 Financial entities shall

have a sound,

comprehensive and



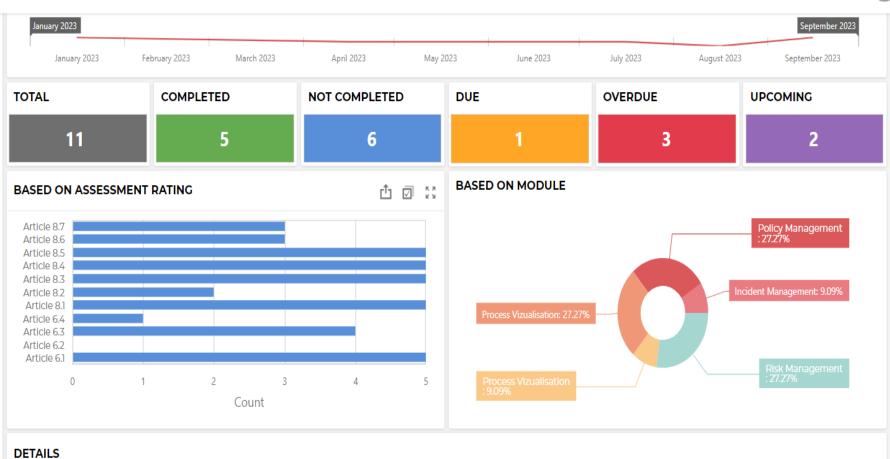


#### **DORA - COMPLIANCE MANAGEMENT**









Published

Date

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8/18/2023 4/12/2023

Completion

8/18/2023

Date

Q Policy

Q

Completed | Circular

Category

Status

□ Q

Policy

Type

Q

Module

Q

Regulation | Management

Policy

Actioner

Q

Felix

Target Target

Q

Rating Date

Assessment

Rating

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## dora360 Vendor Risk Management



- Organisational
- Financial
- Operational Resilience
- Cyber (including dark web)
- Social Media
- Real-time controversy alerting
- Regulatory Compliance (e.g. FCA Register)
- Proactive Vulnerability
- Individual Data Analysis (e.g. Companies House)

