

# Results of DORA readiness survey

1 October 2024



Commission de Surveillance  
du Secteur Financier

Commission  
Surveillance  
Secteur Financier

# DORA Readiness Survey

- The CSSF launched a survey to allow it to gain a better view of the readiness of the market towards the end of the implementation timeline for DORA, which becomes applicable on 17 January 2025.
- Objectives of the survey:
  - Primarily **to assess the level of readiness as of September 1<sup>st</sup>**, (so four and a half months before DORA application date) by financial entities towards DORA, and **capture the main challenges encountered** by financial entities.
  - Secondary **to raise once more the awareness** to those financial entities that are late in getting ready.
- Answers accepted between September 2<sup>nd</sup> and September 16<sup>th</sup>
- Participation was not mandatory but was strongly recommended

# Very good level of participation

■ 389 answers out of 494 contacted entities => **almost 80%**

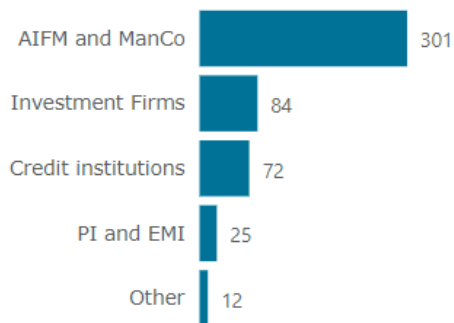
**494**

Contacted entities

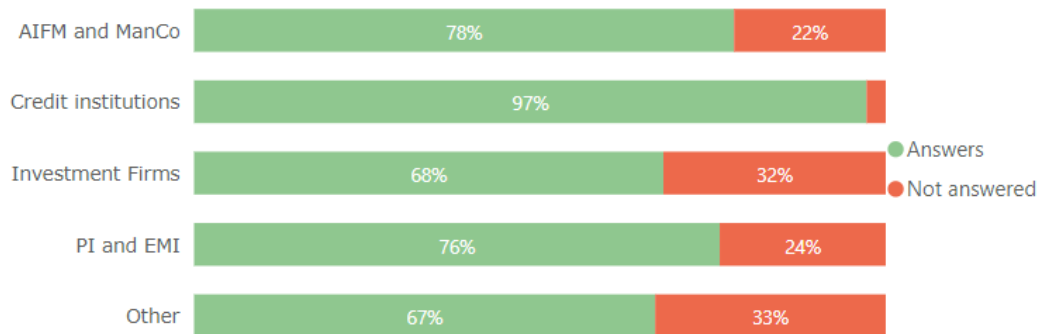
**389**

Answers

Number of contacted entities per type



Answers / Not answered by entity type

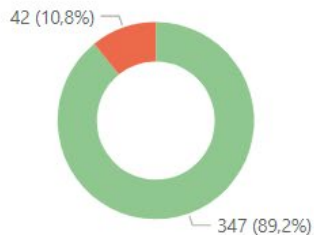


# 1

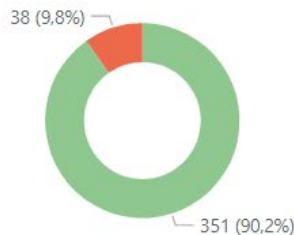
## Part 1: GAP analysis & perceived readiness

# GAP analysis carried out – all entity types cumulated

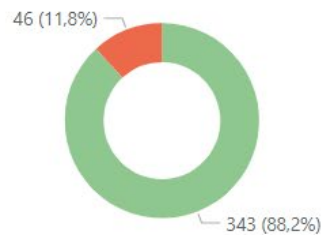
## ICT Risk Management



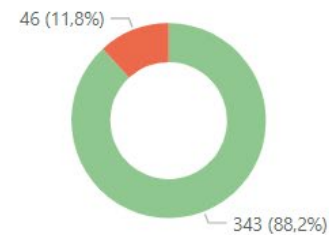
## ICT-related incident management, classification and reporting





## Digital operational resilience testing



## ICT third-party risk management

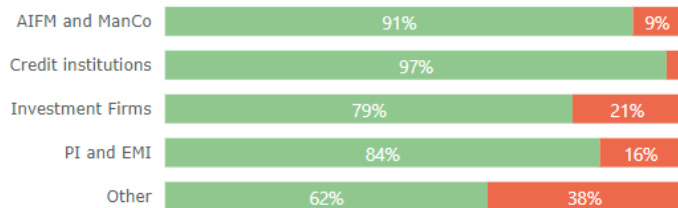


Yes   
No 

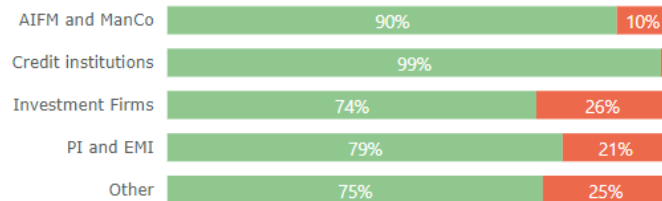
- Nearly 90% of entities have carried out a gap analysis between their situation and DORA requirements. Entities that have carried out a gap analysis have generally addressed all four topics.
- Just over 10% of entities are very late and should work on their gap analysis and action plan immediately!
- Overall, strong progression in gap analysis realized compared to results from previous surveys (e.g. ABBL or PwC surveys done between March and June on a sample of entities)

# GAP analysis carried out - per entity type

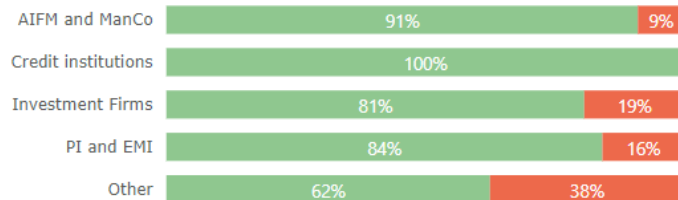
## ICT Risk Management



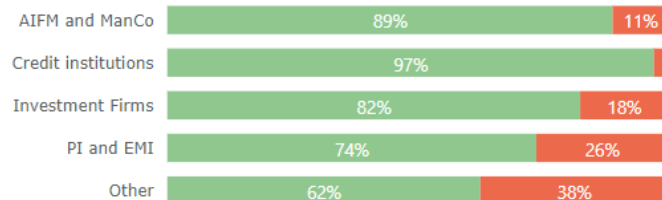
## Digital operational resilience testing



## ICT-related incident management, classification and reporting



## ICT third-party risk management



No   
Yes 

- Credit institutions are the most advanced, with >97% having carried out a GAP analysis, followed by AIFM and ManCo with nearly 90%
- Investment Firms, PI and EMI are between 74% and 84%

# Overall perceived readiness level



■ **The overall perceived readiness score is 2.8**, (1 being fully ready, 4 being not ready)

=> As expected, the market is still in a preparatory phase but progressing well

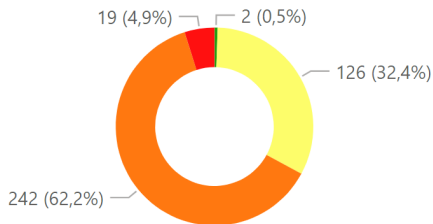
- **71%** of the entities perceive themselves as **partially ready** and is homogenous among entity types
- **23%** of the entities perceive themselves as **mostly ready** and is homogenous among entity types
- **6%** of the entities perceive themselves as **not ready**
- 1 entity perceives itself as fully ready

# Overall perceived readiness level - per DORA topics

## ICT Risk Management

Score  
**2,7**

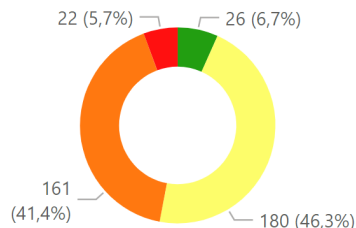
Perceived readiness



## ICT-related incident management, classification and reporting

Score  
**2,5**

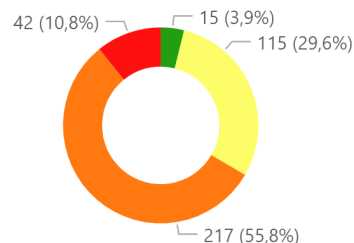
Perceived readiness



## Digital operational resilience testing

Score  
**2,7**

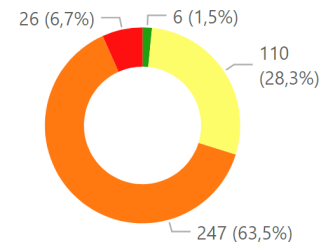
Perceived readiness



## ICT third-party risk management

Score  
**2,8**

Perceived readiness



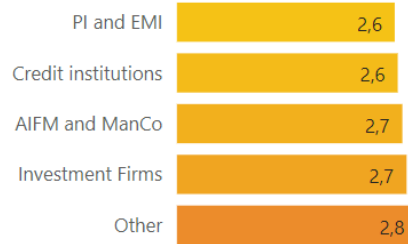
- The scores of the topics are quite balanced, except on Incident management, which is slightly better (2.5). Presumably this is because the pre-existing setup on ICT incident management already in place is close to the DORA requirements.
- Between 30% (for ICT third-party risk management) and 53% (for ICT incident management) of the entities are fully or mostly ready. The others still have significant work ahead of them.





# Perceived readiness - per entity type

## Average score by entity type (all chapters included)

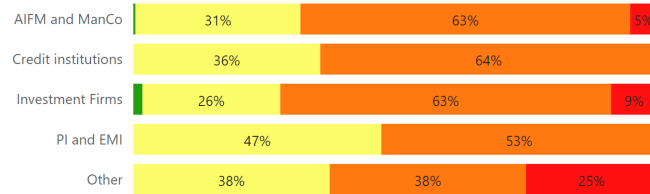


All chapters included, there is no significant discrepancies between entity type's readiness (scores are between 2.6 and 2.8)

### ICT Risk Management

2,7

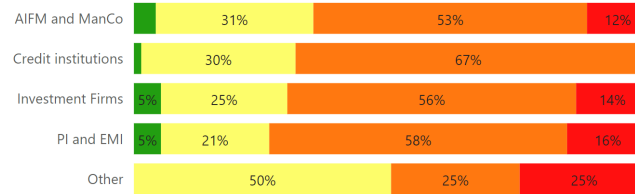
Score



### Digital operational resilience testing

2,7

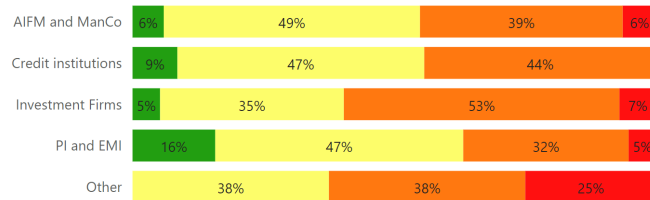
Score



### ICT-related incident management, classification and reporting

2,5

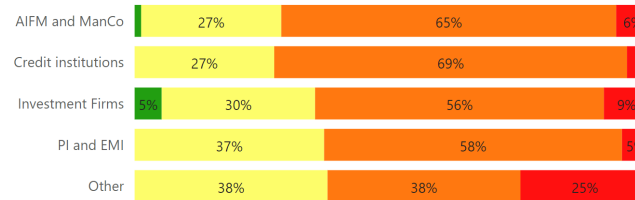
Score



### ICT third-party risk management

2,8

Score



- 1 - Fully ready
- 2 - Mostly ready
- 3 - Partially ready
- 4 - Not ready

2

# Top challenges

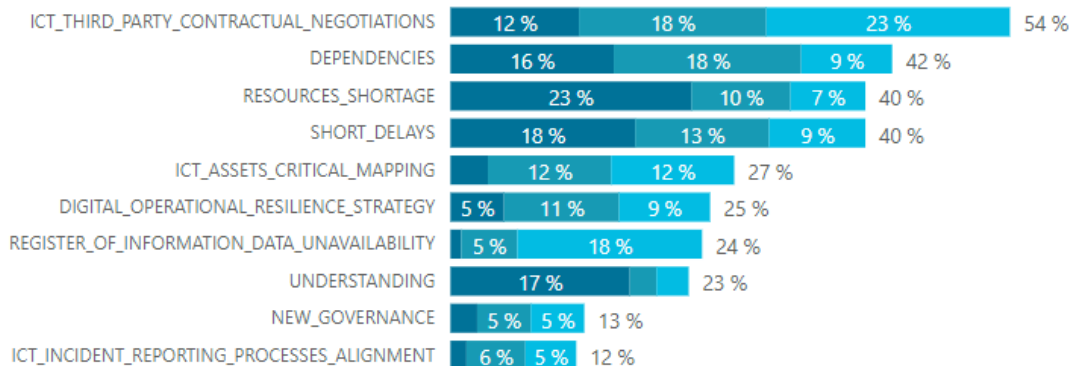
# Terminology

## The challenges proposed for selection were:

- Understanding of DORA requirements
- Shortage of resources (Technical, Human Resources, Budget)
- Short delays to implement DORA requirements
- Dependence on group resulting in coordination efforts (complexity and delays)
- New governance set-up (board involvement, control functions, cultural change)
- Defining and implementing your digital operational resilience strategy
- Mapping of critical or important functions with information assets and ICT assets
- Alignment of ICT related incident reporting processes and tooling
- Contractual negotiations with ICT third party service providers
- Unavailability of underlying information to complete the Register of Information

# Overall Top 3 most critical challenges

Priority ● 1 ● 2 ● 3



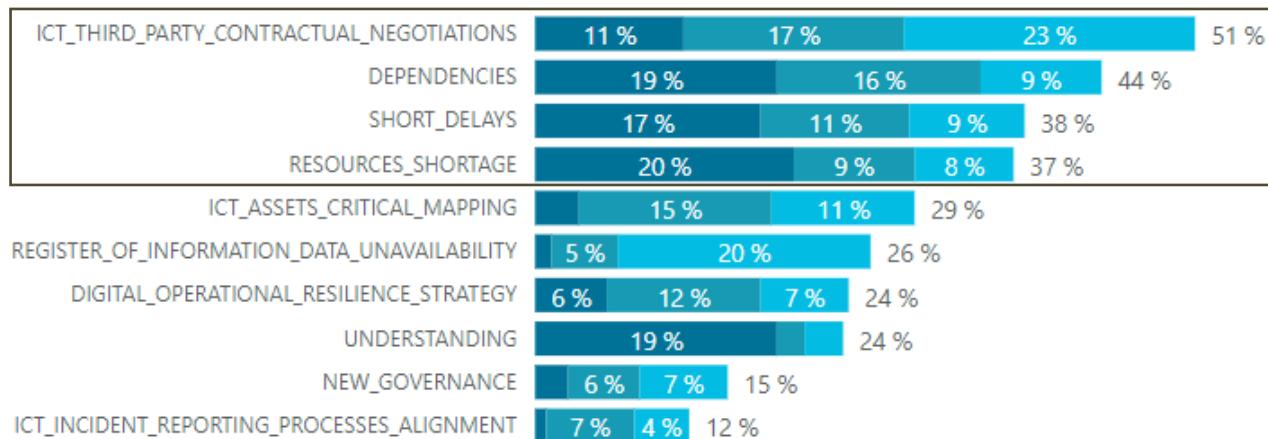
## ■ The top challenges, all priorities included :

- **Contractual negotiations** with ICT third party service providers (54%)
- **Dependence on group** resulting in coordination efforts (complexity and delays) (42%)
- **Shortage of resources** (Technical, Human Resources, Budget) (40%)
- **Short delays** to implement DORA requirements (40%)

- **“Shortage of resources** (Technical, Human Resources, Budget)” is **the most raised Priority 1**, with nearly 1 entity out of 4 (23%)
- On the opposite, “Alignment of ICT related incident reporting processes and tooling” has only been raised by 12% of the entities (all priorities included), and only by 1% as priority 1
- “Understanding of DORA requirements” was raised by 17% of the entities as Priority 1 and selected in top 3 by 23%, calling for even more exchanges with peers, professional associations, advisors and authorities (SSM/CSSF)

# Critical challenges – Focus on AIFM & ManCo

Priority ●1 ●2 ●3

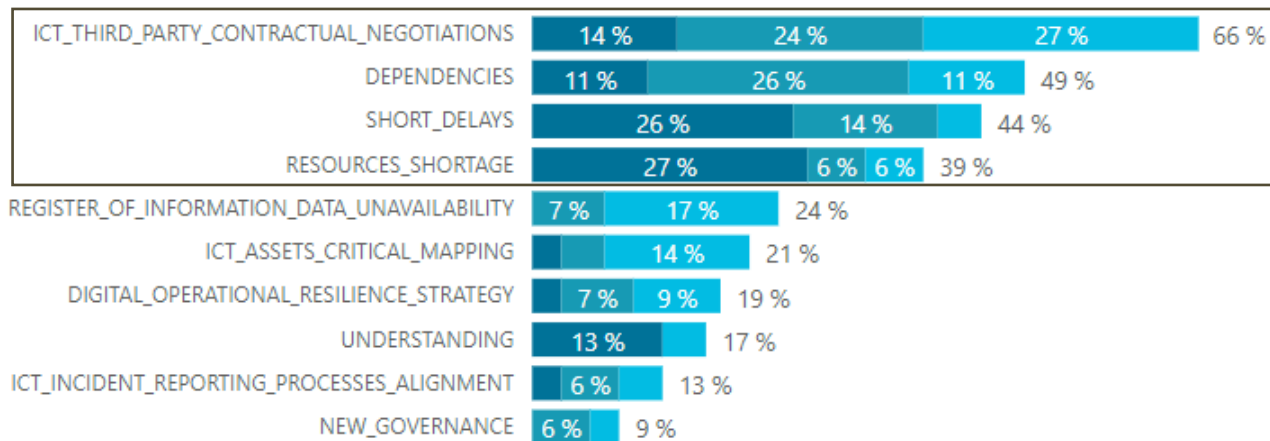


Top 4

- “Contractual negotiations with ICT third party service providers” is the top challenge and has been raised by 51% of the entities, followed by “Dependence on group” with 44%
- “Shortage of resources (Technical, Human Resources, Budget)” is the most raised Priority 1, with 20% (concern for 37% of the entities), followed by “Dependence on group” with 19% in Priority 1 (concern for 44% of the entities)
- In line with the entity average, “Understanding of DORA requirements” was also raised by 19% of the AIFM & ManCo entities as Priority 1, but is a concern for 24% of them

# Critical challenges – Focus on Credit institutions

Priority ● 1 ● 2 ● 3

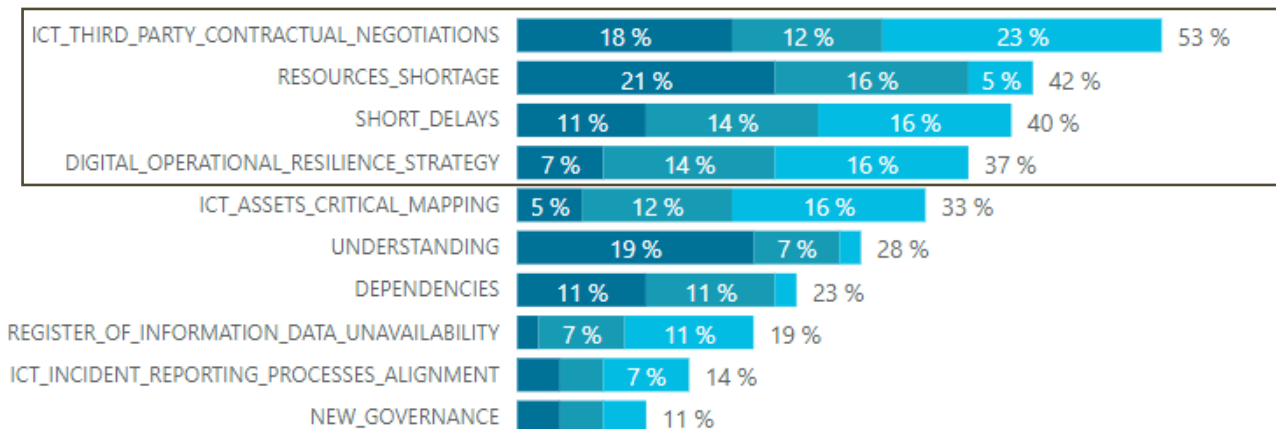


Top 4

- “Contractual negotiations with ICT third party service providers” is the top challenge and has been raised by 66% of the entities, followed by “Dependence on group” with 49%
- “Shortage of resources (Technical, Human Resources, Budget)” is the most raised Priority 1, with 27% (concern for 39% of the entities), followed by “Short delays” with 26% in Priority 1 (concern for 44% of the entities)
- “Understanding of DORA requirements” is less of a concern than for other entities (Total 17%)

# Critical challenges – Focus on Investment Firms

Priority ●1 ●2 ●3

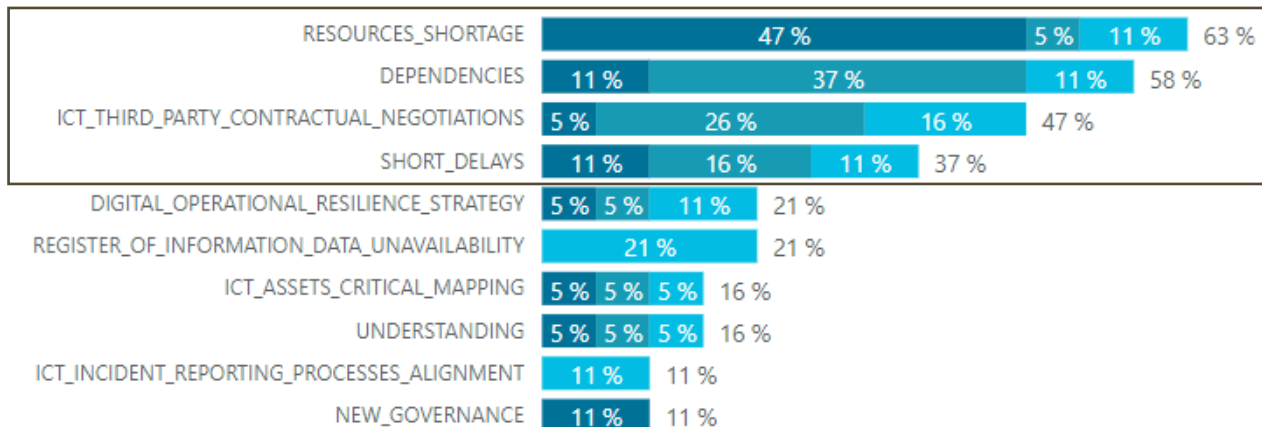


Top 4

- “Contractual negotiations with ICT third party service providers” is the top challenge and has been raised by 53% of the entities, with 18% in priority 1
- “Shortage of resources (Technical, Human Resources, Budget)” is the most raised Priority 1 with 21% and is a concern for 42% of the entities
- “Defining and implementing your digital operational resilience strategy” appears only in the EIs’ top 4, with 37% raised, but with only 7% in priority 1
- In line with the entity average, “Understanding of DORA requirements” was raised by 19% of the entities as Priority 1, and is a concern for 28% of the Investment Firms

# Critical challenges – Focus on PI and EMI

Priority ● 1 ● 2 ● 3



Top 4

- “Shortage of resources (Technical, Human Resources, Budget)” is by far the most raised Priority 1, with 47% and is a concern for 63% of the entities
- “Dependence on group resulting in coordination efforts (complexity and delays)” is a concern for 58% of the entities, however, it is only considered as Priority 1 by 11% of the entities
- Unlike other entities, “Contractual negotiations with ICT third party service providers” is on 3<sup>rd</sup> rank, with 47% of the entities and only 5% in priority 1
- “Understanding of DORA requirements” is less of a concern than for other entities, with a total of 16% and only 5% in Priority 1