Thomas Murray

What's Next for DORA in 2026?

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Hosts

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About Thomas Murray

- Founded in 1994.

- Clients include major global banks and investors.

- Team of 120+ risk and security professionals.

- Headquartered in London, UK.

Assured Service Provider
in association with
National Cyber Security Centre
Cyber Incident Response: Standard Level

CREST MEMBER

CREST SECURITY TESTING — Penetration Testing

CREST INCIDENT MANAGEMENT — Incident Response

SARASIN & PARTNERS

Schroders

BNY MELLON

Standard Chartered

PICTET 1805

ONTARIO TEACHERS' PENSION PLAN

1796 LOMBARD ODIER
LOMBARD ODIER DARIER HENTSCH

SOCIETE GENERALE

montagu

HSBC

Morgan Stanley

FAB
First Abu Dhabi Bank

BARCLAYS

جهـاز الاستثمـار العُمانـي
Oman Investment Authority

BANK OF AMERICA

QNB

BNP PARIBAS

EDMOND DE ROTHSCHILD

NatWest Markets

Rothschild Martin Maurel

RBC

citibank

BRITISH AIRWAYS PENSIONS

NORTHERN TRUST

NOMURA

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Any questions?
Please contact us:

Poll Question:

What is the primary subsector of your organisation?

Please select one of the following:

1. Credit Institution

2. Payment Institution

3. Electronic Money Institution

4. Central Securities Depository

5. Central Counterparty

6. Trading Venue

7. Insurance or Reinsurance Undertaking

8. Other

Any questions?
Please contact us:

Poll Question:

What's relevant to you from the below word cloud?

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Any questions?
Please contact us:

Session overview

What we'll be talking about

- What can we learn from 2025 (key milestones and take-homes)?

- Reporting requirements: The Register of Information and ICT Risk Management Framework review report.

- Regulatory outlook and supervisory priorities for 2026.

- Looking ahead: What are the recommended DORA priorities for financial entities in 2026?

Your reasons for watching

- Learn more about DORA compliance.

- Ask us questions.

- Get our TPRM DORA checklist.

- Talk to a Thomas Murray expert to get clarity on TPRM.
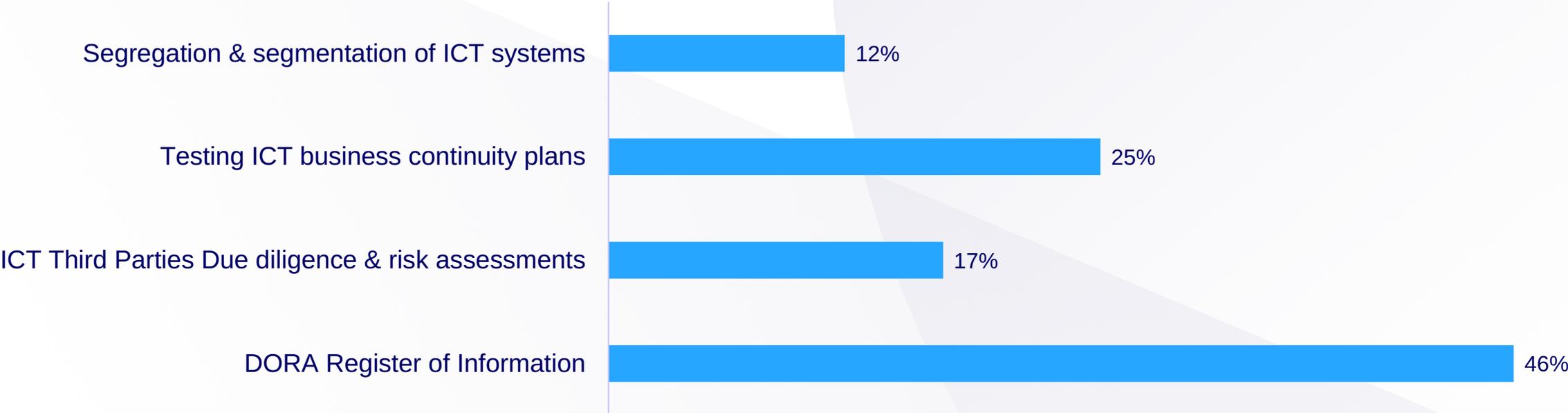
- Find out what happens next.

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Any questions?
Please contact us:

What can we learn from 2025 (key milestones and take-homes)?

Relevant Industry Survey: DORA Implementation Challenges

As per the Deloitte European Survey on DORA (March 2025):

Challenge	Percentage
Segregation & segmentation of ICT systems	12%
Testing ICT business continuity plans	25%
ICT Third Parties Due diligence & risk assessments	17%
DORA Register of Information	46%

Any questions?
Please contact us:

Relevant Industry Survey: DORA Implementation Challenges

As per the PwC Luxembourg Survey on DORA (June 2025):

Challenge	Percentage
Dependence on groups which leads to coordination challenges, complexity and delay	9%
Lack of awareness or engagement from senior management	9%
Missing guidance on legal definitions (e.g. critical or important functions)	12%
Understanding and collecting of information for the 'Register of Information'	13%
Insufficient internal expertise/resources	18%
High implementation costs	21%
Understanding how to move from compliance to resilience	25%
Contract negotiations with third party ICT service providers	39%
Conducting resilience testing	50%
Integrating DORA requirements into existing policy frameworks	51%
Mapping of critical functions with information assets and ICT assets	54%

https://www.pwc.lu/en/digital-operational-resilience-act/dora-laying-the-groundwork/reponse-report-dora.html?vXhj=egi25cg5

Any questions?
Please contact us:

BaFin Supervisory Findings

Governance

Unclear strategies; non-measurable objectives; insufficient involvement of the management body.

Protection and Prevention

Inadequate vulnerability and patch management; insufficient testing; weak third-party security controls.

Detection and Response

Incomplete SIEM coverage; weak log protection; insufficient alarm handling.

Business Continuity

Outdated or untested recovery plans; weak integration of third-party providers.

Risk Management

Incomplete identification of critical functions; inventory deficiencies; weak independence of ICT control functions.

Any questions?
Please contact us:

Poll Question: What are your key 2026 DORA challenges?

1. Renegotiating contracts with ICT providers to include DORA-compliant clauses.

2. Determining the right balance between under-reporting and over-reporting ICT-related incidents.

3. Defining comprehensive and relevant scenarios for resilience testing that meets regulatory and operational needs.

4. Maintaining the Register of Information (RoI) with accurate and up-to-date details.

5. Maintaining up-to-date DORA compliance status across multiple entities.
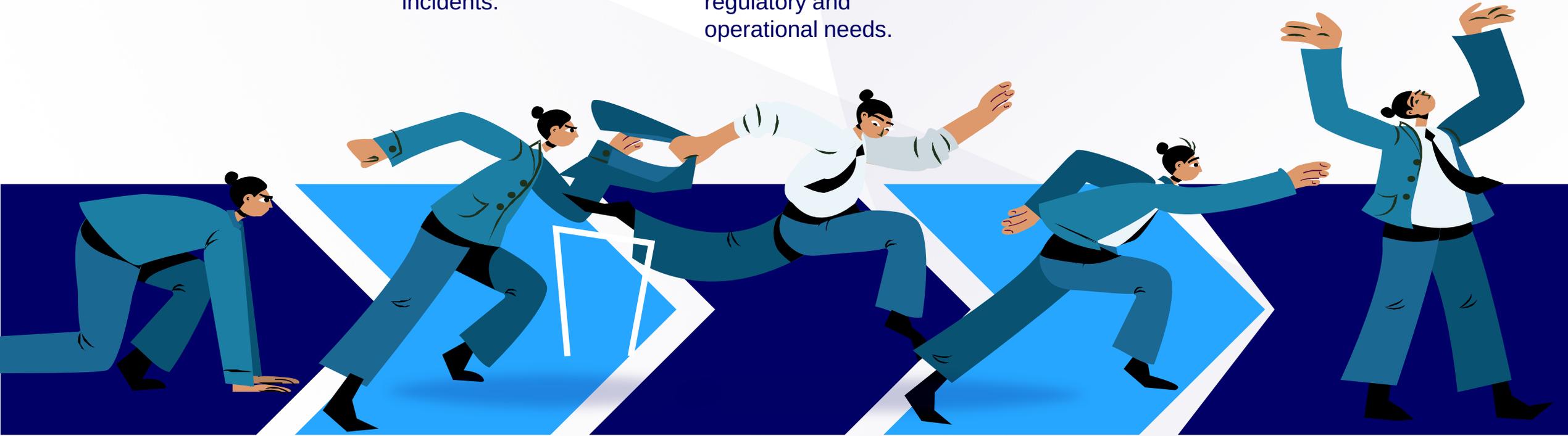
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Reporting requirements:
The Register of Information and ICT Risk Management Framework review report

Poll Question:

Do you anticipate facing any of these issues during the 2026 RoI submission process?

Select all that apply:

1. File structure issues.

2. Missing or invalid identifiers.

3. Referential integrity errors.

4. Late submissions.

5. Other.

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Any questions?
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Register of Information (RoI) submission recommendations for 2026

1. Design for xBRL-CSV readiness.

2. Leverage technology for centralised RoI management.

3. Embed automated data quality controls.

4. Enable structured data collection across stakeholders.

5. Maintain the RoI as a living register.

Poll Question:

Has your ICT Risk Framework Review been formally documented?

Select one:

1. 100% - Acing it!

2. Not yet but it's planned.

3. It's under consideration.

4. No, what's that?

Any questions?
Please contact us:

ICT Risk Management Framework Review Reporting

Submit your report on the review of the ICT risk management framework.

Give a clear description of the information required for documenting the review, along with sources of data for review.

Ensure governance, stakeholders and input providers are identified beforehand.

Documenting this requires significant effort and coordination between stakeholders.

Any questions?
Please contact us:

Regulatory outlook and supervisory priorities for 2026

What we've heard about DORA so far

1. DORA has had a significant impact on business.

2. Boards are still engaged.

3. Concern over third-party risk management processes.

4. Engagement with regulators is high.

5. Registers of Information (ROI) have been a challenge.

6. A clear ongoing commitment to DORA compliance.

Poll Question:

What is your estimated level of DORA compliance?

Select one:

1. 100% - Acing it!

2. Above 75% - Just about there.

3. Between 50% and 75% - We're getting there.

4. Below 50% - We know what we ought to do but have other priorities.

5. Below 50% - We're actively working to define a plan.

Looking ahead: Recommended 2026 DORA priorities for financial entities

Key Takeaways

Q1 onwards:

- Will be mostly for RoI updates and submissions.
- Ensure robust processes for RoI and other regulatory reporting such as the ICT Risk Management Review Report.

Competent authorities are:

- Actively looking for reassurance on operational implementation of DORA requirements.
- Focus on assessing your DORA operational readiness.

TPRM:

- Is a supervisory priority across multiple national competent authorities.
- Make sure your ICT third-party risks have been identified, managed and documented.
- Continuous third-party monitoring will earn you brownie points.

Any questions?
Please contact us:

The Thomas Murray TPRM Checklist

Scan the QR code to access the TPRM Checklist

Your practical TPRM implementation guide

Thank you for joining us!