
31 May 2024

Frequently Asked Questions

DORA 2024 Dry Run exercise on reporting of registers of information

This document provides answers to the frequently asked questions about the ESAs 2024 DORA Dry Run exercise on reporting of the registers of information of contractual arrangements with the ICT third-party providers. The answers focus on the questions regarding the practical nature of the reporting exercise, including preparation of the reporting files, their submission and use by the ESAs.

The FAQ document does not provide responses to the questions regarding the interpretation of the relevant legal acts related to the registers of information, including the provisions of DORA and Final report on the draft Implementing Technical Standards on the registers of information – such questions are to be addressed through a formal Questions and Answers process established by the ESAs for handling the questions of such nature.

The answers to the questions are provided on ‘best efforts’ basis by the ESAs staff for the purposes of the dry run exercise and therefore do not represent any legal interpretation or guidance agreed with the competent authorities, nor they represent official stance of the ESAs.

##	Category	Question	Answer
1	Use of collected information	How the information collected in the dry run exercise will be used by the ESAs, will it be used for the designation of critical ICT third-party service providers (CTPPs)? When will the first list of CTPPs will be available?	<p>The ESAs will use the information collected in the dry run, to analyse the data quality of the submissions and provide feedback to the financial entities on the data quality issues. The ESAs will also identify common issues regarding data quality that will be summarised in the public report.</p> <p>The information collected will not be used for the purposes of CTPP designation. First designation of CTPPs that will be made in 2025 based on the information collected through reporting of registers of information following first application of DORA from 17 January 2025. Such first list of CTPPs will be made available in H2 2025.</p> <p>The ESAs may, however, use the information collected in the dry run in testing own processes and methodologies for the CTPP designation.</p>
2	Feedback from dry run	Will there be any feedback anonymised/generalised made available regarding ICT third-party providers, e.g. regarding what of their services are considered as critical or important	Given the preparatory and voluntary nature of the dry run exercise, including the possibility for the financial entities to provide partial information, the ESAs will not draw any public conclusions from the information received apart from the data quality observations. No feedback will be provided to the ICT third-party providers based on the dry run exercise.
3	Feedback from dry run	Will the ESAs provide feedback regarding financial entities internal processes?	The feedback from the ESAs will focus on the data quality aspects of the submitted registers of information. Relevant competent authorities may provide feedback regarding entities' internal process as part of their supervisory engagement with the entities.

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4	Participation in dry run	Does a financial entity need to register its participation with the ESAs?	There is no need to register for the participation in the dry run with the ESAs, as the ESAs are able to accept files from all financial entities during to the defined reporting window. However, as the reporting is done through the relevant competent authorities, it is important that the financial entities wishing to submit their registers agree their participation with the competent authorities, as otherwise they will not be able to submit files or receive feedback from the ESAs.
5	Participation in dry run	Can a financial entity unilaterally decide to participate in the dry run, or consent from the competent authority is needed?	Financial entities cannot participate in the dry run on their own without the consent from the relevant competent authority. This is because of the reporting flows to the ESAs, as the reporting is done through the relevant competent authorities, it is important that the financial entities wishing to submit their registers agree their participation with the competent authorities, as otherwise they will not be able to submit files or receive feedback from the ESAs.
6	Participation in dry run	Is there any limitation on the number of participating financial entities?	No. The ESAs are not imposing any limitations on the participation and will process all files received. However, some competent authorities may introduce some restrictions to manage their own workload in the exercise.
7	Participation in dry run	Do you have any idea on the workload that financial entities need to plan with if they want to participate to the dry run?	The workload depended on many factors, including types and size of an entity, number of ICT third-party service providers, numbers of contracts with them, number of ICT services offered, state of readiness of the register of information etc.

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8	Participation in dry run	When a parent company registers to its competent authority, it will need to register all the legal entities or each of them will need to register to their specific CAs?	<p>The participation of the groups of financial entities in the dry run follows the same approach established as for the steady-state reporting from 2025 onwards. So, if the group of financial entities participates in the dry run on the consolidated basis, it is sufficient for the parent entity to agree on its participation with the relevant competent authority, and then the register will be submitted on the consolidated basis.</p> <p>See also questions regarding group reporting/consolidation.</p>
9	Participation in dry run	Can financial entities from the EEA countries participate in the dry run?	Financial entities from EEA countries (Norway, Iceland, Liechtenstein) can participate in the dry run exercise provided that their competent authorities have agreed to such participation and have been onboarded to the ESAs reporting solution.
10	Participation in dry run	Can financial entities that are still collecting necessary information for their registers of information participate with partial registers with some sample of contracts?	The dry run is a preparatory exercise aimed also at stimulating financial entities to build the registers in accordance with the applicable requirements. To this end financial entities may participate in the dry run with incomplete or partial registers. They are nevertheless encouraged to provide as many data points as possible for the contracts they report in order to fully benefit from the data quality feedback to be provided by the ESAs at the end of the exercise.
11	Timelines	Will there be specific deadlines for reporting to the competent authorities, and when they will be made available?	The ESAs will be able to receive files in a time window from 1 July to 31 August. As the reporting is done through the relevant competent authorities, they may set up specific deadlines within this time window to facilitate their own internal processes. Competent authorities will communicate such deadlines, where relevant, to the participating financial entities in their jurisdictions. The ESAs do not maintain a record of such individual deadlines.

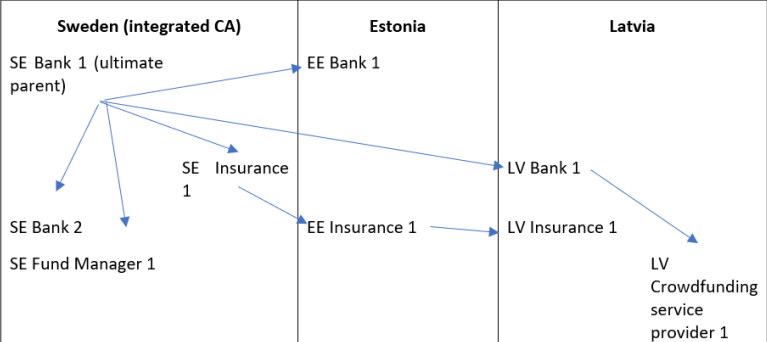
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12	Reporting channels	To whom should the financial entities send their registers of information, to the ESAs or to the competent authorities?	Both for the dry run and steady-state reporting from 2025 onwards, the financial entities will need to provide their registers to their competent authorities and those would submit them to the ESAs. Specific channels for reporting to the competent authorities will be specified by the competent authorities both for the dry run and for the steady-state reporting from 2025 onwards.
13	Reporting channels	Do ESAs plan to use some test platform to test the quality of the report before the submission?	The dry run exercise is considered to be a test for the solutions to be used for the steady-state reporting from 2025 onwards. Therefore, no specific additional testing is planned.
14	Role of the competent authorities	What is the role for the competent authorities in the dry run?	Competent authorities act as a gateway and communication channel between the financial entities and the ESAs in the contact of the dry run. The financial entities will need to provide their registers to their competent authorities and those would submit them to the ESAs. Contrary to the steady-state reporting from 2025 onwards, in the context of the dry run competent authorities are not expected to perform any quality assurance work on the registers received from the financial entities and will pass the received files directly to the ESAs.
15	Role of the competent authorities	What is the relevant competent authority for my financial entity, and what if there are several of them?	The competences of the competent authorities and appointment of the competent authorities for DORA purposes, including the collection of registers of information, depend on the type of financial entity and it is done in accordance with Article 46 of DORA.

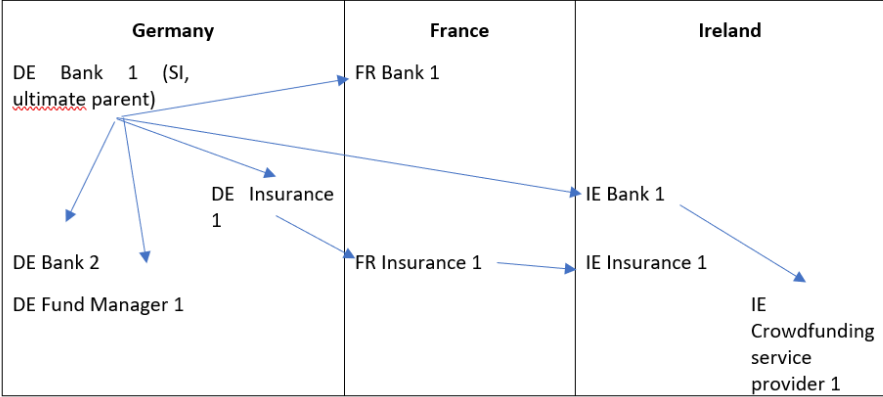
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16	Reporting from 2025 onwards	Would the financial entities be expected to report full registers of information from 2025 onwards and with what frequency?	<p>For the steady-state reporting form 2025 onward, financial entities will be expected to report their complete registers of information on annual basis. This reporting will be to the competent authorities, who will in turn provide the registers to the ESAs for the purposes of CTPP designation.</p> <p>In H2 2024, the ESAs are going to issue a decision outlining the modalities of such reporting, including its timelines. Technical means and formats of such reporting are expected to be as close as possible to the dry run.</p>
17	Reporting from 2025 onwards	Will the ESAs maintain the tools used for the dry run also for the purposes of the steady-state reporting from 2025 onwards?	<p>The tools are provided solely for the purposes of the dry run, as (1) they are based on the final report of the draft ITS on the registers of information, which is not the final version of the legislative act adopted by the EU commission, and they are (2) based on the draft data point model, which is being finalised in parallel with the dry run exercise. The final data point model and technical specifications will be made available to the competent authorities and financial entities to set up reporting solutions to facilitate the steady-state reporting without relying on the ad hoc tools provided for the dry run. To this end, the ESAs do not plan to update and maintain the .CSV conversion tool for the steady-state reporting.</p>
18	Technical formats for reporting	What format will be required to provide registers of information?	<p>The registers of information are to be reported in plain-csv format according to the specification provided by the ESAs. The same technical format will be used for the dry run and steady-state reporting form 2025 onwards.</p>

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19	Technical formats for reporting	How can financial entities generate reporting files in the specified format? Any special software is needed?	Financial entities can generate the required reporting files .csv and .zip files for the submission of the registers of information either directly from their systems containing the registers of information (according to the specification of the technical files and filing rules provided) or by using the VBA-based conversion tool provided by the ESAs solely for the purposes of the dry run.
20	Templates for the register of information	Should financial entities use templates in Excel provided by the ESAs or can have register in other systems?	<p>The ESAs do not prescribe any formats or technical solutions for the actual keeping of the registers by the financial entities.</p> <p>The technical specifications affect only reporting of the registers to the ESAs through the competent authorities.</p>
21	Templates for the register of information	How the templates for the dry run are different from the templates published by the ESAs in January 2024 together with the Final report on the draft ITS on RoI?	<p>Together with the publication of the Final Report on the draft ITS on the registers of information in January 2024, the ESAs published illustrative templates in Excel providing visual representation of the requirements set out in the Final Report. These templates were meant for illustrative purposes.</p> <p>The templates provided for the dry run, whilst still based on the same final report published in January, provide more accurate representation of the requirements from the data modelling perspective that should facilitate the reporting of the registers.</p>
22	Templates for the register of information	Would there be some examples of how to populate the templates be provided.	Yes. Materials published on 31 May also include examples of how to fill in the register templates.

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23	Use of identifiers	What to report if LEI for the ICT third-party provider is not available	In case the LEI is not available for the ICT third-party provider (or its ultimate parent undertakings) in the dry run exercise in accordance with the Final Report on the draft ITS on RoI, financial entities can use corporate registration number, VAT number, passport number or national identity number in a format: <i>'Country Code'+Underscore+'Type of Code'</i> . Please refer to the instructions to the RoI template RT.02.02 (B.02.02)
24	Data protection	What do the ESAs have to protect the information reported to them?	For the purposes of the dry run (and steady state reporting from 2025 onwards) the ESAs use similar infrastructure used currently for collection of prudential reporting. From the design perspective, it is assumed that the security classification of the data to be contained in the registers of information and, therefore, handled by the ESAs is up to and including 'EU SNC' (Sensitive Non-Classified) level.
25	Reporting group registers/consolidation	According to DORA the registers shall be kept at individual, sub-consolidated and consolidate level. How this will be reflected in reporting to the ESAs?	<p>Whilst the competent authorities exercising their supervisory powers in accordance with DORA may request financial entities to provide registers at individual, sub-consolidated and consolidated level, for the purposes of reporting to the ESAs (both in steady state from 2025 onwards and in dry run the following applies). Registers should be reported at:</p> <ul style="list-style-type: none"> • at individual entity level, where financial entities are not part of a group of financial entities (stand-alone financial entities); • at individual entity level, where financial entities are part of a group of financial entities, and where the parent undertaking is an entity outside of the Union and there is no EU parent undertaking;

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			<ul style="list-style-type: none"> at the highest level of consolidation in the EU for groups of financial entities that is available to the competent authorities in accordance with their supervisory responsibilities under the legal acts referred to in Article 46 of DORA (see next question for more details).
26	Reporting group registers/consolidation	How to report to the ESAs registers for the groups of financial entities that span across different sectors and different Member States?	<p>The following data flows for the registers of groups of financial entities are assumed considering the scope of the responsibilities of various competent authorities under Article 46 of DORA:</p> <ul style="list-style-type: none"> integrated competent authorities that are fully responsible for the supervision of all financial entities belonging to the same group (DORA group) report to the ESAs one complete RoI for the whole DORA group; sectoral competent authorities report to the ESAs aggregated/consolidated RoI for the entities under their supervisory remit at the highest EU level of consolidation with respect to DORA Groups available to them (e.g. highest prudential consolidation of a banking or insurance group). In case the prudential scope of consolidation would encompass entities from another financial sector (e.g. a fund manager in an insurance group), the register of information of this entity would be encompassed in the consolidated/sub-consolidated RoI of the group, so reported to the ESAs by the competent authority in charge of consolidated/sub-consolidated RoI, and would not be reported individually. sectoral competent authorities report to the ESAs individual or sub-consolidated RoI for the entities of the group, where parent undertaking is not subject to DORA requirements, or is outside of their supervisory remit.

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			<p>Example 1. Cross-border cross-sectoral group (DORA Group), where the prudential consolidating supervisor is an integrated CA</p>  <pre> graph TD subgraph Sweden_integrated_CA [Sweden (integrated CA)] SE_Bank_1[SE Bank 1 (ultimate parent)] SE_Bank_2[SE Bank 2] SE_FM[SE Fund Manager 1] SE_Ins_1[SE Insurance 1] end subgraph Estonia EE_Bank_1[EE Bank 1] EE_Ins_1[EE Insurance 1] end subgraph Latvia LV_Bank_1[LV Bank 1] LV_Ins_1[LV Insurance 1] LV_Crowd[LV Crowdfunding service provider 1] end SE_Bank_1 --> SE_Bank_2 SE_Bank_1 --> SE_FM SE_Bank_1 --> SE_Ins_1 SE_Bank_1 --> EE_Bank_1 SE_Bank_1 --> LV_Bank_1 SE_Ins_1 --> EE_Ins_1 EE_Ins_1 --> LV_Ins_1 LV_Bank_1 --> LV_Crowd </pre> <ul style="list-style-type: none"> SE CA being an integrated supervisor will provide to the EBA one consolidated/aggregate RoI requested from the SE Bank 1 as ultimate parent undertaking covering all FE entities of the DORA groups.

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			<p>Example 2. Cross-border cross-sectoral group (DORA Group), which is headed by the SSM Significant Institution (SI)</p>  <pre> graph TD subgraph Germany DE_Bank_1["DE Bank 1 (SI, ultimate parent)"] DE_Bank_2["DE Bank 2"] DE_FM["DE Fund Manager 1"] end subgraph France FR_Bank_1["FR Bank 1"] FR_Ins_1["FR Insurance 1"] end subgraph Ireland IE_Bank_1["IE Bank 1"] IE_Ins_1["IE Insurance 1"] IE_Crowd["IE Crowdfunding service provider 1"] end DE_Bank_1 --> DE_Bank_2 DE_Bank_1 --> DE_FM DE_Bank_1 --> FR_Bank_1 DE_Bank_1 --> DE_Ins_1["DE Insurance 1"] DE_Ins_1 --> FR_Ins_1 FR_Bank_1 --> IE_Bank_1 FR_Ins_1 --> IE_Ins_1 IE_Bank_1 --> IE_Crowd </pre> <ul style="list-style-type: none"> • ECB being a prudential supervisors of SI will provide to the ESAs group Rol from DE Bank 1 covering the prudential scope of consolidation, including DE Bank 2, FR Bank 1 and IE Bank 1. (DE Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation DE Bank 1 protection group) • DE CA responsible for supervision of insurance, will provide to the ESAs consolidated Rol collected form from DE Insurance 1 covering the insurance prudential group including FR Insurance 1 and IE insurance 1. • DE CA responsible for the supervision of DE Fund Manager 1 will provide to the ESAs individual Rol (in case that FE is not included into the prudential scope of consolidation of DE Bank 1 group)

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			<ul style="list-style-type: none"> IE CA responsible for the supervision of IE Crowdfunding service provider will provide to the ESAs individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally DE Bank 1 group) <p>Example 3. Cross-border cross-sectoral group (DORA Group) with multiple non-integrated CAs</p> <pre> graph TD subgraph Italy ITB1["IT Bank 1 (LSI, ultimate parent)"] ITB2["IT Bank 2"] ITART["IT Issuer of ART 1"] ITINS["IT Insurance 1"] ITFM["IT Fund manager 1"] end subgraph France FRB1["FR Bank 1"] FRINS["FR Insurance 1"] FRFM1["FR Fund manager 1"] FRFM2["FR Fund manager 2"] FRFM3["FR Fund manager 3"] end subgraph Ireland IEB1["IE Bank 1"] IEINS["IE Insurance 1"] IECSP["IE Crowdfunding service provider 1"] end ITB1 --> FRB1 ITB1 --> IEB1 ITB1 --> ITB2 ITB1 --> ITART ITINS --> FRINS ITINS --> IEINS ITFM --> FRFM1 ITFM --> FRFM2 ITFM --> FRFM3 IEB1 --> IECSP </pre> <ul style="list-style-type: none"> IT CA responsible for supervision of IT Bank 1 will provide to the ESAs group RoI from IT Bank 1 covering the prudential scope of consolidation, including IT Bank 2, FR Bank 1 and IE Bank 1. (IT Issuer of ART 1, IT Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation IT Bank 1 banking group)

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			<ul style="list-style-type: none"> • IT CA responsible for supervision of insurance, will provide to the ESAs consolidated RoI covering insurance prudential group IT Insurance 1 including FR Insurance 1 and IE insurance 1. • IT CA responsible for the supervision of issuers of asset-reference tokens will provide to the EBA individual RoI for IT Issuer of ART 1 in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group and equally IT Bank 1 group) • IT CA responsible for the supervision of fund managers will provide to the ESAs consolidated register for IT Fund manager 1 covering also FR Fund Manager 1, FR Fund Manager 2 and Fund Manager 3 (in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group) • IE CA responsible for the supervision of IE Crowdfunding service provider will provide to the ESA individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally IT Bank 1 group)
27	Language	Can financial entities provide registers in languages other than English?	Yes. The register can be reported in other languages than English, however, internal consistency of the registers should be ensured, i.e. information for all financial entities covered by the same register is provided in one consistent language. For languages using non-Latin alphabet, financial entities are requested to provide the registers using Latin alphabet.