● All institutions In force

DORA, digital operational resilience

The DORA Regulation has applied since 17 January 2025. It governs ICT risk management, incident reporting, resilience testing and the use of service providers. The ECB has made it a focus of its supervisory work for 2027-2029.

APPLICATION DATE	WHO REQUIRES IT	WHO YOU ANSWER TO	NATURE OF THE REQUIREMENT
17 Jan 2025	EU legislator (DORA Regulation)	ECB, ACPR, AMF	Prudential supervision

INSTITUTIONS CONCERNED

Large banking group · Mid-sized bank · Specialised finance · Private bank · Asset manager · Insurer · Mutual and protection insurer · Public financial institution

Solid: concerned. Dashed: depending on status or activity.

MILESTONES

The timeline of the text.

- **27 Dec 2022** — Publication of Regulation (EU) 2022/2554
- **16 Jan 2023** — Entry into force
- **17 Jan 2025** — Application
- **19 Nov 2026** — ECB supervisory priorities 2027-2029

IN DETAIL

What is changing.

Four pillars

IN APPLICATION SINCE 17 JANUARY 2025

ICT RISK	INCIDENTS	TESTING	SERVICE PROVIDERS
• ICT risk management framework	• Incident reporting to the supervisor	• Resilience testing • Threat-led penetration testing	• Third-party risk management • Cloud dependencies

ECB programme for 2027-2029: two inspection campaigns, on cybersecurity and on third-party risk.

Regulation (EU) 2022/2554 on digital operational resilience for the financial sector has applied since 17 January 2025. It covers four pillars: ICT risk management, incident reporting, resilience testing and management of the risk borne by ICT service providers.

The ECB's supervisory priorities for 2027-2029, published on 19 November 2026, provide for two inspection campaigns, on cybersecurity and on third-party risk, threat-led penetration tests conducted under DORA and a review of cloud dependencies.

OUR VIEW

Since the regulation started to apply, the point is no longer compliance on paper, but proving that the framework works: an up-to-date register of providers, incidents reported on time, tests followed by actions. System changes, such as a core banking migration or a move to the cloud, are when this framework is most exposed.

WHAT WE DO

Taking DORA requirements into account in system migration and transformation projects, maintaining the data of the register of providers, documentation of controls.

DORA | Third-party risk | Cloud

CORE BANKING→

FURTHER READING

Official sources.

ECB, supervisory priorities 2027-2029	https://www.bankingsupervision.europa.eu/framework/supervisory-policy/html/ssm.supervisory_priorities202611.en.html
ACPR, DORA page	https://acpr.banque-france.fr/fr/reglementation/focus-sur-la-reglementation/transverse/digital-operational-resilience-act-dora
AMF, DORA page	https://www.amf-france.org/fr/actualites-publications/dossiers-thematiques/dora
EIOPA, DORA page	https://www.eiopa.europa.eu/digital-operational-resilience-act-dora_en

Links checked on 23 November 2026.