DORA. REPORT

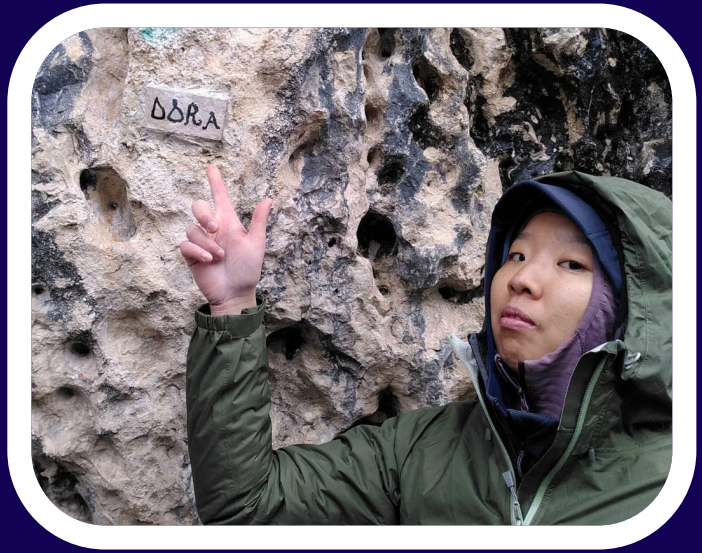
Practical DORA (Digital Operational Resilience Act) for SREs

October 2025

SRE CON_ EUROPE MIDDLE EAST AFRICA

Hello 👋

- Laura Woo
- Co-founder of DORA.report



https://www.ukclimbing.com/logbook/crags/citta_dei_sassi_city_of_rocks-10601/dora-142263

Disclaimer

I am not a lawyer

DORA. REPORT

The relevant bits of DORA for SREs

Incident Management

Digital OpRes

TPP Risk Management

DORA

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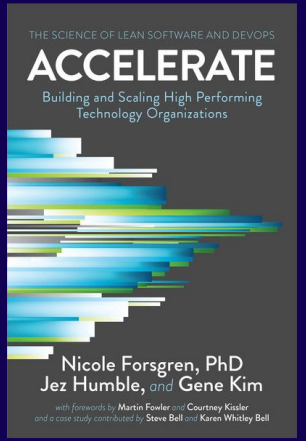
DORA. REPORT

DORA



DORA. REPORT

DORA = Digital Operational Resilience Act

DORA. REPORT

➔ Applicable since **Jan 17th 2025**

JAN

DORA Facts ⚡

DORA Facts

- In scope:
  - **20** types of Financial entities
  - Critical 3rd party providers

https://dora.report/blog/who-is-in-scope-for-dora/

DORA Facts ⚡

- Non-compliance
  - “penalties and measures shall be effective, proportionate and dissuasive”
- TPP Non-compliance
  - Up to 1% of of avg. daily global turnover

https://eur-lex.europa.eu/eli/reg/2022/2554/oj (Article 50)
https://eur-lex.europa.eu/eli/reg/2022/2554/oj (Article 35 [8])

DORA. REPORT

1

ICT Risk Management

5 Key Pillars

DORA. REPORT

1

ICT Risk Management

2

Incident Management, Classification, and Reporting

5 Key Pillars

DORA. REPORT

1

ICT Risk Management

2

Incident Management, Classification, and Reporting

3

Digital Operational Resilience Testing

5 Key Pillars

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5 Key Pillars

1. ICT Risk Management
2. Incident Management, Classification, and Reporting
3. Digital Operational Resilience Testing
4. Managing ICT Third-Party Risk

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5 Key Pillars

1. ICT Risk Management
2. Incident Management, Classification, and Reporting
3. Digital Operational Resilience Testing
4. Managing ICT Third-Party Risk
5. Information Sharing Agreements

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5 Key Pillars

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Digital OpRes

‘critical or important function’

*means a function, the **disruption** of which would materially impair the financial **performance** of a financial entity, or the **soundness** or **continuity** of its **services** and activities, or the discontinued, defective or failed performance of that function would materially **impair** the continuing **compliance** of a financial entity with the conditions and obligations of its authorisation, or with its other obligations under applicable financial services law;*

- Article 3 (22) , Regulation (EU) 2022/2554

What are the core offerings or processes that if they fail - would severely impact your companies ability to operate or hinder you from meeting your regulatory obligations

Digital OpRes

- Do you know what your Critical or important functions (CIFs) are?
- Which services underpin your CIFs?
- Is the information accessible?

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Digital OpRes

CIFs
Test yearly

TPP CIFs
Test periodically

TLPT
Every 3 years

https://eur-lex.europa.eu/eli/reg/2022/2554/oj (Article 24 - 27)

ROI = Register of information

https://eur-lex.europa.eu/eli/reg/2022/2554/oj (Article 28 - 30)

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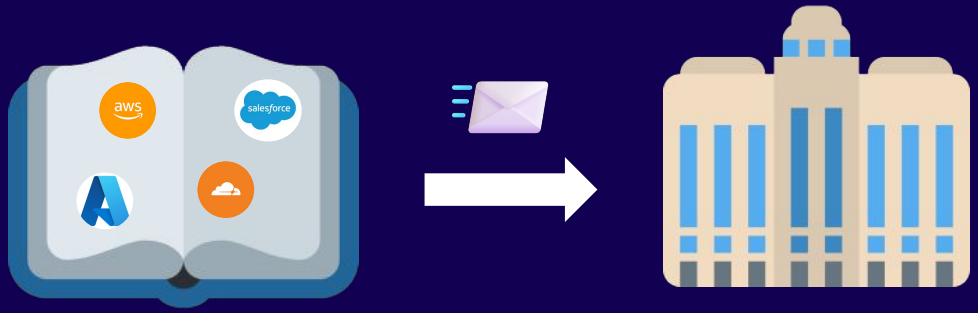
TPP Risk Management



Report yearly to your CA

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TPP Risk Management

Onboard a new vendor that underpins critical function

Inform your CA

TPP Risks

Fail or
degrade in quality

Service
disruption

Breach regs / laws =
contract termination

Do you have an exit strategy?

Exit Strategy

Documented

Tested

Reviewed periodically

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“Raising incidents became so **complicated** with the addition of DORA requirements that developers are now **scared** to raise incidents.”

- *Fintech Engineering Lead*

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Incident Management

Andy

DORA. REPORT

Incident Management

Andy

SRE
Payments Team

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Incident Management

High Priority Alert

Andy is on-call

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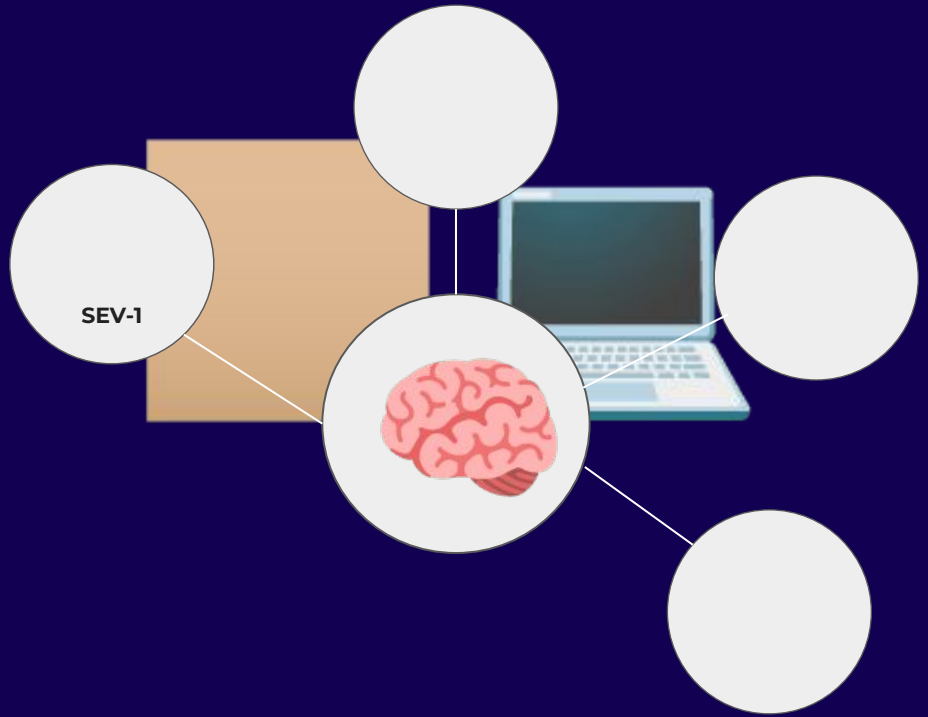
Incident Management



Andy

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Payments Team

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Incident Management

Andy

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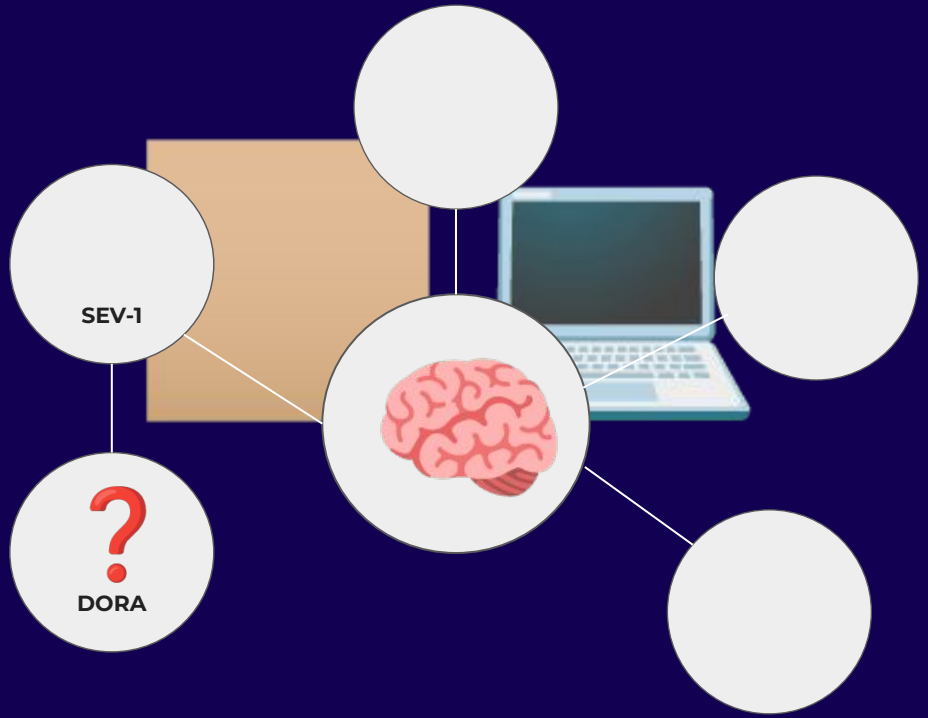
Payments Team



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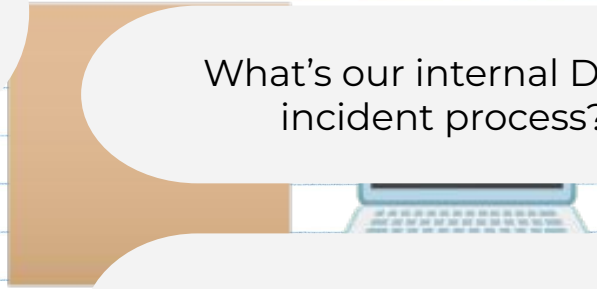

What's our internal DORA incident process?

What's the DORA incident classification?

Is this a recurring incident that's considered DORA Major?

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Does the incident originate from a TPP? If so, does aggregate reporting apply?

What are the DORA reporting timelines?

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Incident Management

What's our internal DORA incident process?

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Incident Management

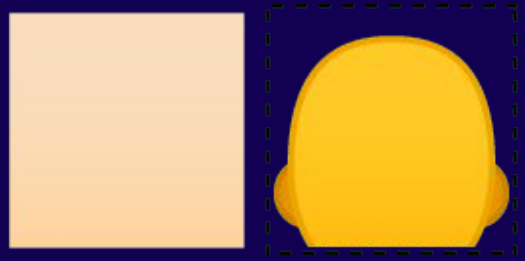
Roles and Responsibilities ?

Jane

Compliance

Fred

Security Operations



Amy

Senior Management Stakeholder

✉️

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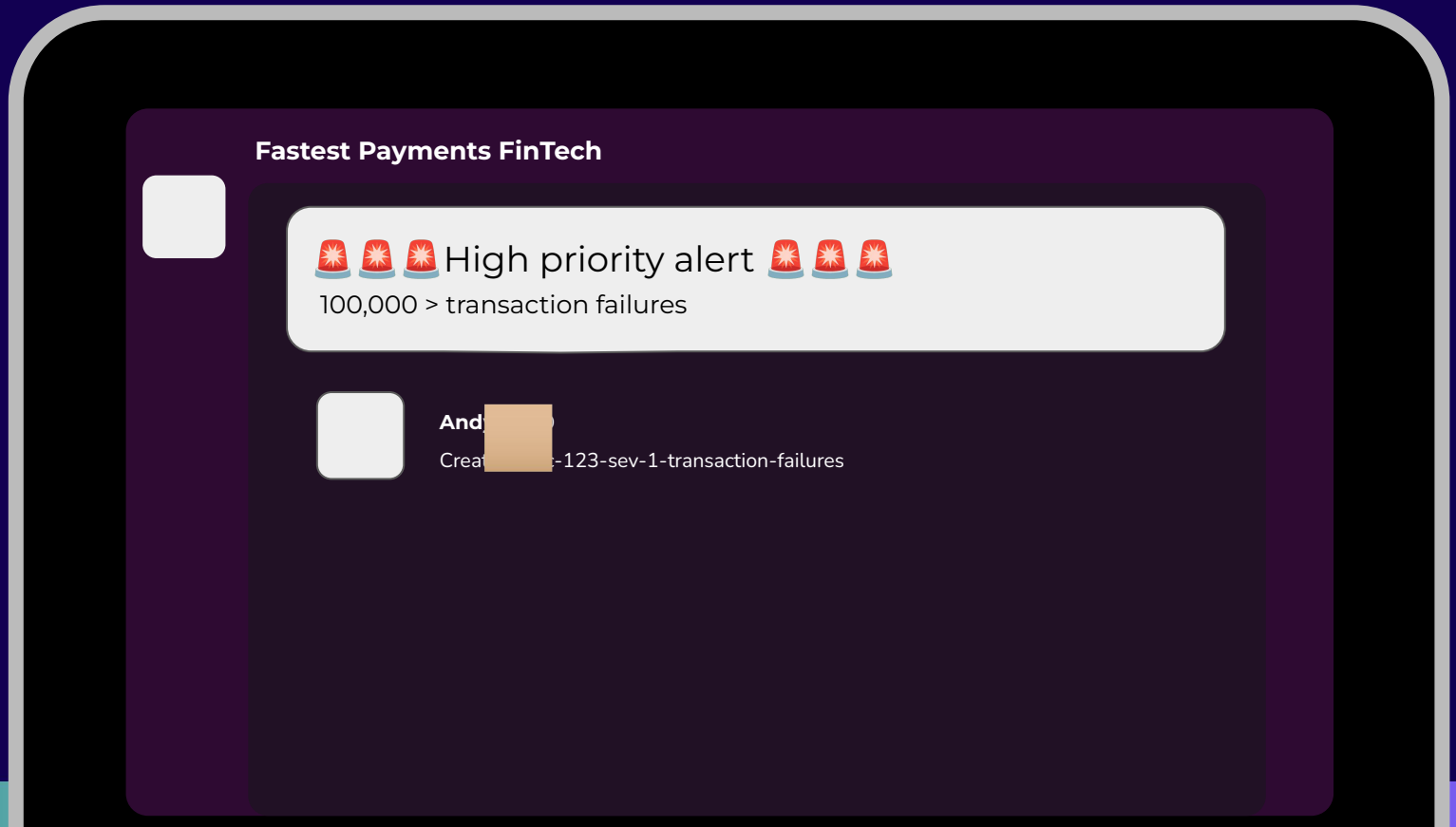
Incident Management



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Incident Management

What's the DORA incident classification?

🔥 Major

🕯️ Minor

Re-classified

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1772 (Chapter 2)

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Incident Management

🔥 Major

Does the incident impact CIFs?

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Incident Management

🔥 Major

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

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Incident Management

🔥 Major

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

||

Criteria B

Incident affects financial services that require authorisation, registration or are otherwise supervised by CA’s

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Incident Management

🔥 Major

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

Criteria B

Incident affects financial services that require authorisation, registration or are otherwise supervised by CA's

Criteria C

Incident represents a successful, malicious and unauthorised access to the network and information systems

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Incident Management

🔥 Major

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

=

Criteria B

Incident affects financial services that require authorisation, registration or are otherwise supervised by CA's

=

Criteria C

Incident represents a successful malicious and unauthorised access to the network and information systems

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Incident Management

🔥 Major ✔

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

X

=

Criteria B

Incident affects financial services that require authorisation, registration or are otherwise supervised by CA's

X

=

Criteria C

Incident represents a successful, malicious and unauthorised access to the network and information systems

✔

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Incident Management

🔥 Major

Does the incident impact CIFs?

Criteria A

Incident affects ICT services or network and information systems that support critical or important functions

=

Criteria B

Incident affects financial services that require authorisation, registration or are otherwise supervised by CA's

Other classification criteria...

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Incident Management

🔥 Major

Other classification criteria...

Criteria 1

Reputational Impact

Criteria 3

Geographical Spread

Criteria 5

Economic Impact

Criteria 2

Duration and service downtime

Criteria 4

Data losses

Criteria 6

Clients, financial counterparts and transactions

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1772

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Incident Management

🔥 Major

Criteria 1

Reputational Impact

***At least 1**

Reflected in the media

Repetitive complaints

Won't meet Reg requirements

Lose clients

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🔥 Major

Criteria 2

Duration and service downtime

Duration
when the incident occurs -> resolved

Service downtime
service is fully or partially unavailable -> regular activities/operations restored to levels prior to incident

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Incident Management

🔥 Major

Criteria 2

Duration and service downtime

Duration > 24 hours

Service downtime > 2 hours
(services that underpin CIFs)

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🔥 Major

Criteria 3

Geographical Spread

≥ 2 member states impacted

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🔥 Major

Criteria 4

Data losses

***Any are fulfilled**

- ➔ Incident has rendered the data unavailable - temporarily or permanently
- ➔ Incident has compromised the trustworthiness of the data
- ➔ Incident has resulted in inaccurate or incomplete data - unauthorised modification
- ➔ Incident has resulted in data being accessed by or disclosed to unauthorised party or system

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Incident Management

🔥 Major

Criteria 5

Economic Impact

Costs and losses due to incident > 100,000 euros

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🔥 Major

Criteria 6

Clients, financial counterparts and transactions

***Any are fulfilled**

- Affected **clients > 10%** of all clients using impacted service
- Affected **clients** using impacted service **> 100,000**
- Affected financial counterparts **> 30%** of **financial counterparts** that use the affected service
- Affected **transactions > 10%** of avg. daily **number** of transactions
- Affected **transactions > 10%** of avg. daily **value** of transactions
- Affected ‘relevant’ clients / financial counterparts

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Incident Management

🔥 Major

Criteria 6

Clients, financial counterparts and transactions

Transactions

You need to account for all affected transactions that involve a monetary amount where **at least 1 part** of the transaction is carried out in the **EU**

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Incident Management

🔥 Major ✅

Other classification criteria...

Criteria 1

Reputational Impact

Criteria 3

Criteria 5

Economic Impact

≥ 2 Additional criteria are met == DORA 🔥 **Major**

Criteria 2

Duration and service downtime

Criteria 4

Data losses

Criteria 6

Clients, financial counterparts and transactions

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Incident Management

🔥 Major

Is this a recurring incident that's considered DORA Major?

1 DORA 🔥 Major Incident

Incidents have occured at least **2x** within **6 months** ✔

Incidents have **same** apparent **root cause** ✔

Incidents collectively meet **Major incident criteria** ✔

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Incident Management

🔥 Major

Is this a recurring incident that's considered DORA Major?

*expect FE's to review recurring incidents on monthly basis

1 DORA 🔥 Major Incident

Incidents have occured at least **2x** within **6 months** ✔

Incidents have **same** apparent **root cause** ✔

Incidents collectively meet **Major incident criteria** ✔

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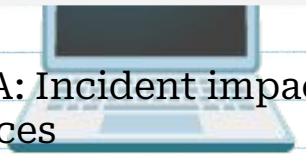
Incident Management

Andy

SRE
Payments Team

DORA

What's the DORA incident classification?



- Meets Criteria A: Incident impacts a number of critical services

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Incident Management

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DORA

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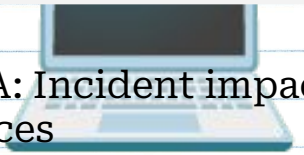

- Meets Criteria A: Incident impacts a number of critical services
- Meets additional criteria:
  - Criteria 3: Geographical spread
    - 🇩🇪🇫🇷

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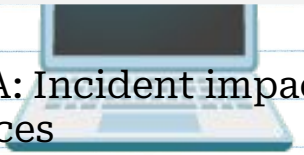
What's the DORA incident classification?



- Meets Criteria A: Incident impacts a number of critical services
- Meets additional criteria:
  - Criteria 3: Geographical spread
    - 🇩🇪🇫🇷
  - Criteria 6: Clients, financial counterparts and transactions
    - > 10% of clients impacted
    - > 10% of daily average number of transactions impacted

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Incident Management

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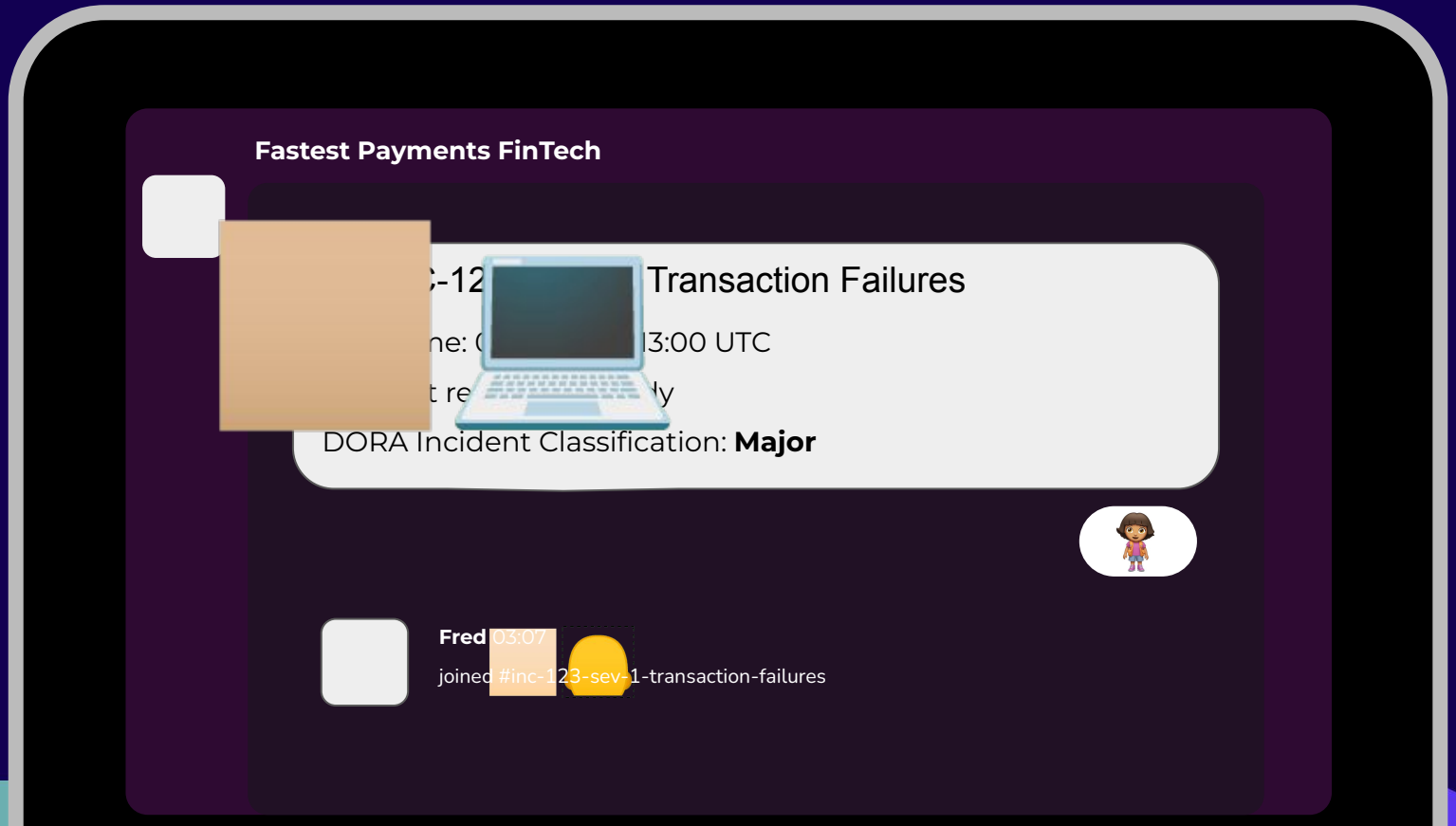

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Incident Management

Recover services

Page Customer Support

Andy

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Payments Team

Fred

Security Operations

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Incident Management

Priority

Recover services

Page Customer Support ?

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Payments Team

Fred

Security Operations

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Incident Management

Who is responsible for crisis communication?

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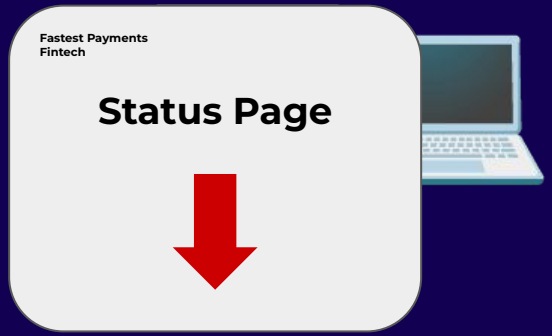

https://eur-lex.europa.eu/eli/reg/2022/2554/oj (Article 14)

Incident Management

Who is responsible for crisis communication?

Andy

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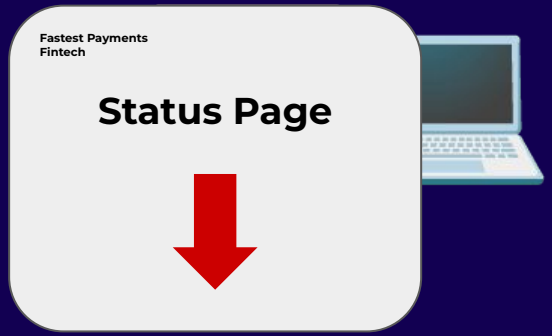

Customer Support

Inform end customers

Inform Financial Counterparts

Media

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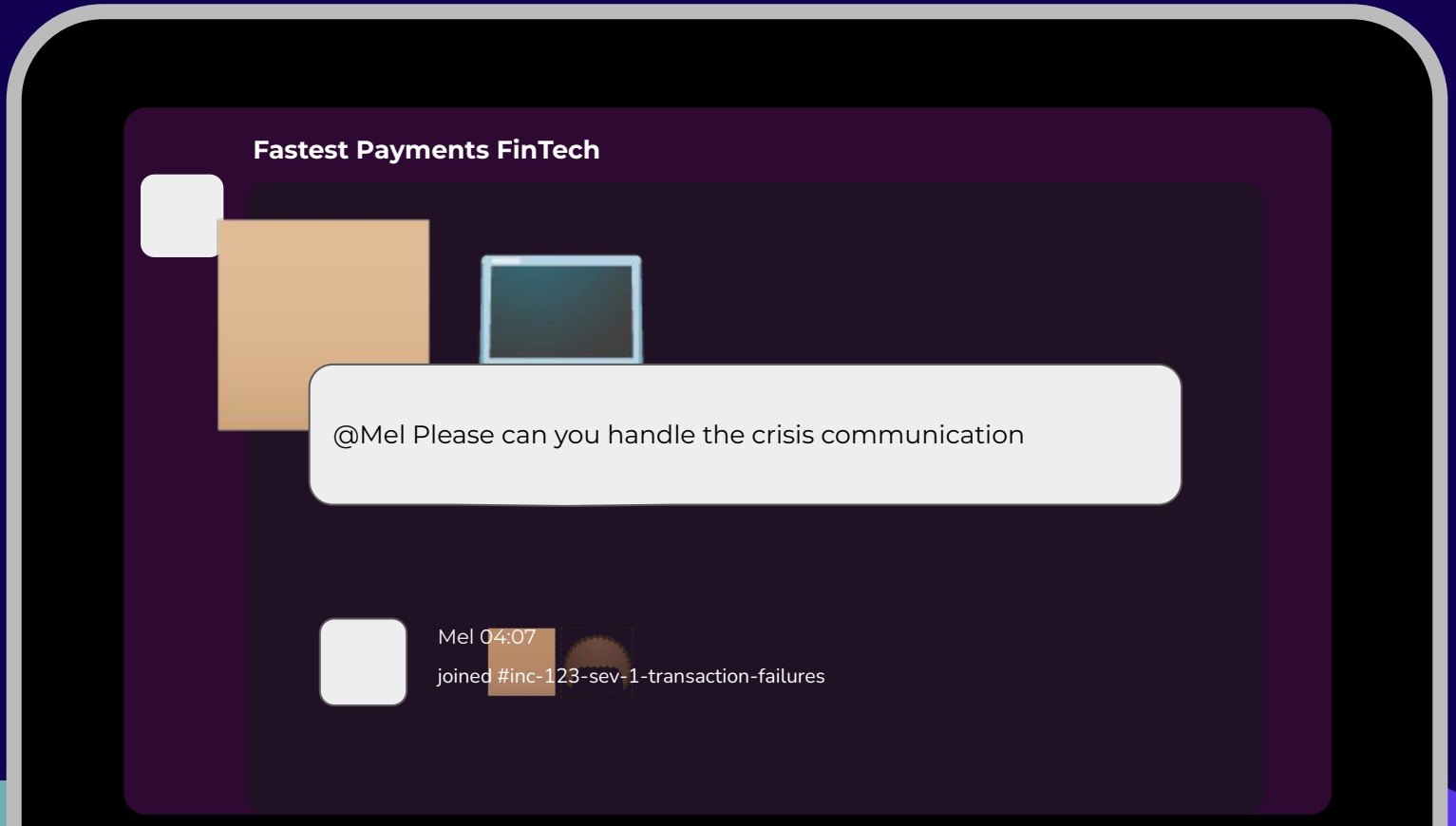

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Payments Team

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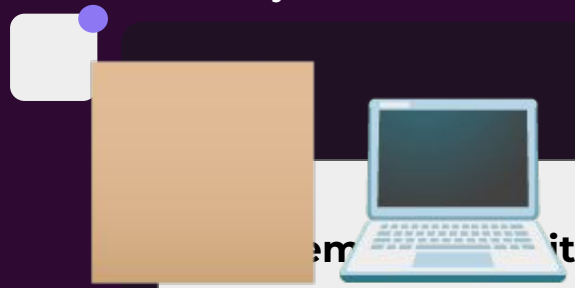
Payments Team

Fastest Payments FinTech



em itial Notification due

Incident responder: **@Andy**

DORA Incident Classification: **Major**

Incident: **INC-123 SEV-1 Transaction Failures**

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Incident Management

Who is responsible DORA reporting?

Andy

SRE

Jane

Compliance

Competent Authority

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Incident Management

You need to submit **3 reports** for DORA Major incidents

Initial Notification

Intermediate Report

Final Report

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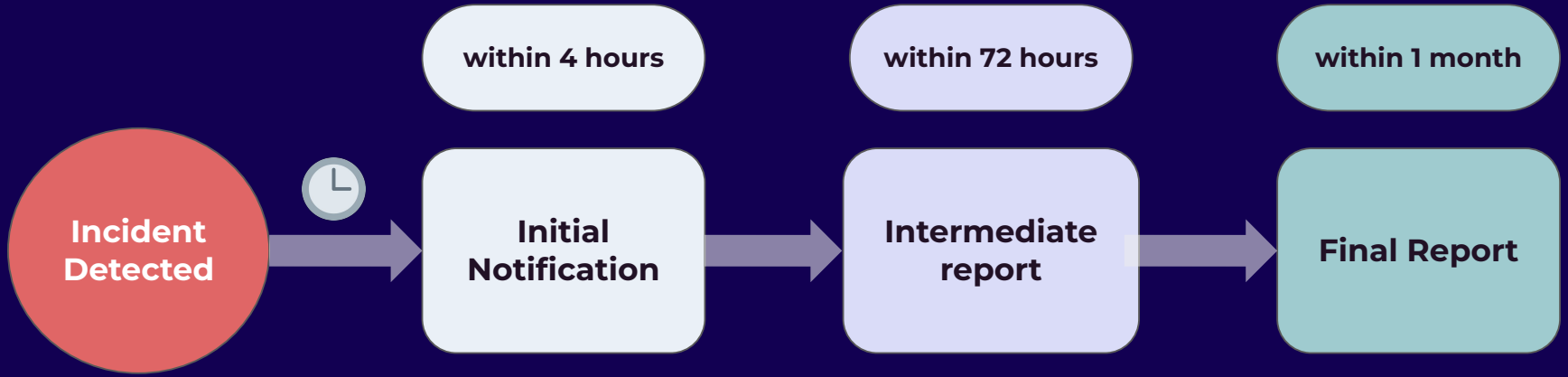
Incident Management



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Incident Management

Weekends and bank holidays

Time limits fall on weekends / bank hols

Submit at Noon the next working day

Except ...

- Credit Institution
- Trading venue operator
- Central Counterparties
- ‘Essential’ or ‘Important’ FE

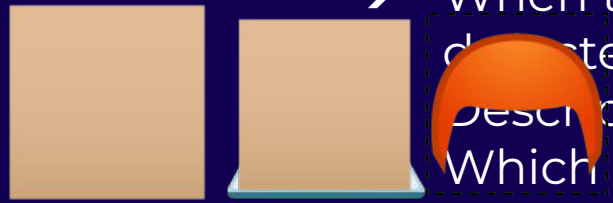
Except ...

- Credit Institution
- Trading venue operator
- Central Counterparties
- ‘Essential’ or ‘Important’ FE

Do you have coverage over the weekend and bank hols?

Initial Notification

- CAs want to receive info about Major Incidents asap
- Contents
  - Significant info
    - ➔ When the incident was d[illegible]ted
    - ➔ Description of the incident
    - ➔ Which member states are impacted
  - etc.



Andy
SRE

Jane
Compliance

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Incident Management

Intermediate Report

Jane

Compliance

- Contents
  - More detailed info
    - ➔ When services are recovered
    - ➔ Affected infra supporting business processes
    - ➔ Measures taken to recover from the incident
- Submit updated intermediate report when activities have been recovered
- Collaborative effort

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Incident Management

Final Report

Jane
Compliance

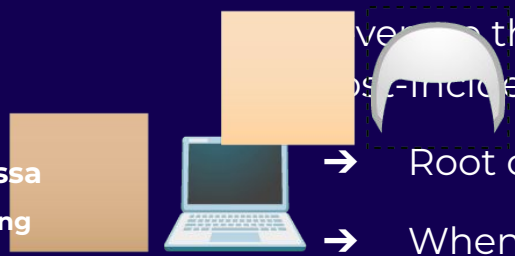
Anna
Product Eng

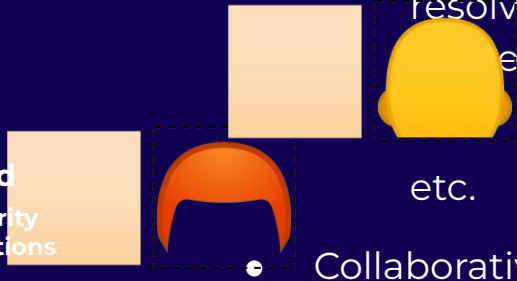
Vanessa
Data Eng

Andy
SRE

Fred
Security Operations

George
Finance





ve the content from your
st-incident report

➔ Root cause analysis

➔ When the incident was resolved and root causes
essed
about the resolution

etc.

Collaborative effort

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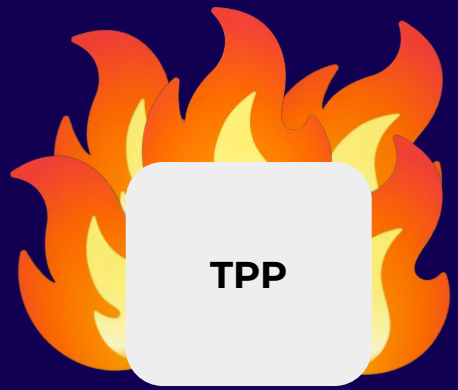
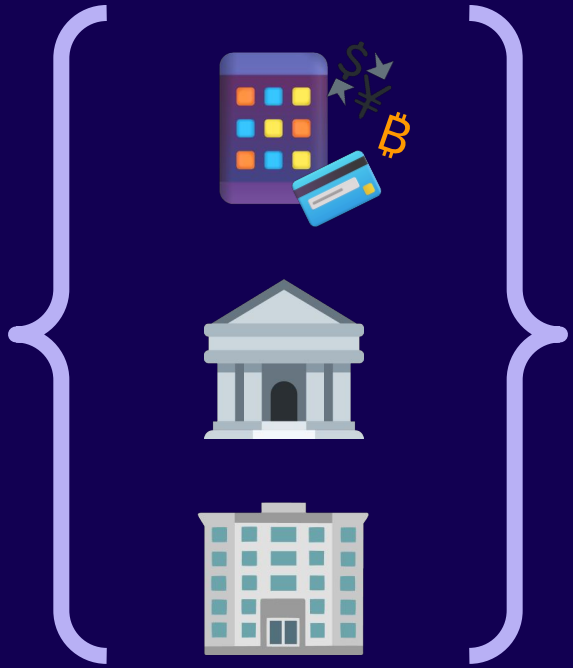
Incident Management

Aggregated reporting





https://eur-lex.europa.eu/eli/reg_impl/2025/302/oj/eng (Article 7)

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“DORA incident management is easy to follow and I’m comfortable raising incidents”

Thank you