

DORA 2024 'Dry run': Ad Hoc Data collection of registers of information

Introductory workshop for financial entities
30 April 2024

Agenda

1.	10:00-10:05	Opening and housekeeping	ESA Staff
2.	10:05-10:20	Welcoming remarks	François-Louis Michaud, Executive Director, EBA
3.	10:20-11:00	Presentation of the DORA dry run exercise	ESA Staff
4.	11:00-12:00	Questions and answers	

Please note that the meeting will be recorded on the basis of Article 29(1)e of Regulation (EU) 1094/2020. The recording will be published afterwards on the websites of EBA, EIOPA and ESMA for the purpose of facilitating the implementation of DORA.

If you do not wish to be recorded, please mute your audio / disable your camera, and inform the organiser by chat message before you take the floor, so that the recording is paused during your intervention. Alternatively, you have the option to send your question via Slido to the presenter who will then read it out loud for you without mentioning your name.

1. Housekeeping: How to interact with us today – Slido

1. Go to [slido.com](https://www.slido.com), enter event code #DORA and your full name and organisation (e.g. *“Mario Rossi (EIOPA)”*).
 - The name and organisation used for Slido and WebEx must be identical.
2. Submit written comments/questions through Slido and upvote questions of interest submitted by other participants.
3. If your question is very popular, we will read it during the meeting and may ask you to raise your hand via WebEx and orally explain it.
 - The moderator will not accept inputs which are:
 - Submitted by people with uncompleted names
 - Offensive
 - Inputs related to areas of DORA not covered during this event, will be given a lower priority compared to those in scope
 - We will try to archive all inputs before each session.

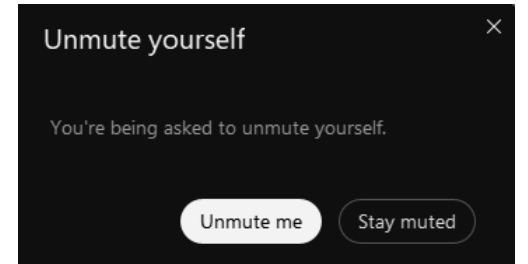


1. Housekeeping: How to interact with us today – WebEx

1. If your input on Slido is selected and the moderator calls your name, you will have to raise up your hand in WebEx by using the “👋” button



2. Once the moderator gives you the word, you will receive a prompt on your screen to unmute yourself.



- Please keep your intervention to max. 2 minutes to also allow others to share their views. Always indicate your name and organisation.
- Given time constraints, we kindly ask your understanding that not all participants may get the possibility to make an oral intervention.
- Don't raise up your hand unless your name is called.

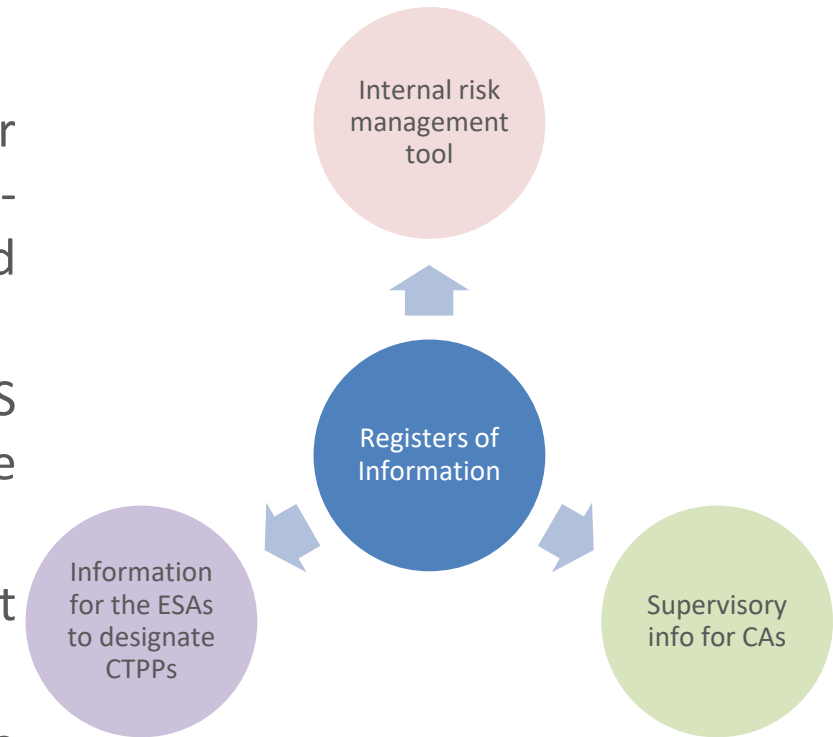
2. Welcoming remarks

François-Louis Michaud, Executive Director, EBA



3. Background: Registers of information

- DORA will become applicable on 17 January 2025
- DORA requires all financial entities (FE) in its scope to have a register of information of all their contractual arrangements with ICT third-party providers available at entity, sub-consolidated and consolidated levels (Article 28(3) of DORA)
- The content of the registers of information is specified in a draft ITS developed by the ESAs which is in the process of being adopted by the European Commission (Final Report available [here](#))
- FE will need to report the registers of information to the competent authorities (CA) starting from early 2025
- CA will provide the registers on annual basis to the ESAs for the purposes of designation of critical ICT third-party service providers (CTPP)





3. Objectives of the dry run exercise

To help with the preparations for establishing and reporting registers of information by the financial entities and competent authorities



- Participating FEs are expected to submit complete Registers of Information in accordance with the Final Report on the Draft ITS on RoI on **best-efforts basis**
- Participating FEs will receive feedback through their competent authority, including: (1) **an assessment of their data quality**, (2) a **cleaned** register of information **dataset**
- The ESAs will also **publish a report with high-level observations about data quality** and will also **organise a workshop** to share their general findings and observations with the industry

To take stock of the preparedness of the market and increase awareness



Help to prepare reporting files



Identify and address data quality concerns



Help to prepare for steady-state reporting (onboarding of CAs)

3. Maximum possible alignment with steady state reporting

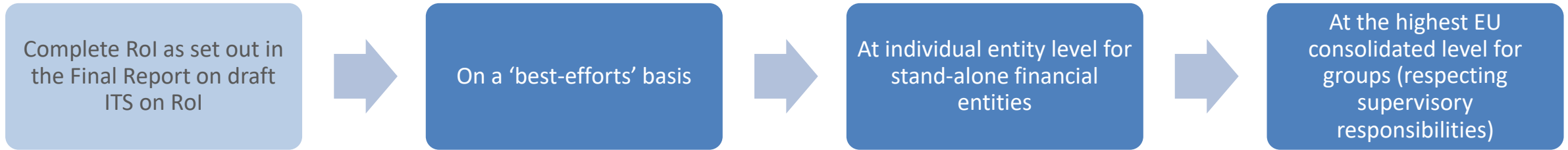


The exercise will introduce **continuity with steady-state reporting**:

- Same approach to data flows and scope of consolidation for FE groups
- Same file formats – plain-CSV
- Use of the same reporting technical package and templates (albeit in draft form)

The exercise will **help with the roll-out of the steady-state reporting** solution for CAs to ESAs reporting

3. What to report



- FEs are expected to provide **complete registers of information** following the requirements of the draft ITS aiming to cover all data fields, all entities within the respective scope and all contractual arrangements
- However, as the exercise is carried out on a **'best-efforts' basis**, FEs provide the information they can/have on the day they report the register → important is to continue effort on collecting missing data and getting registers ready for 2025 reporting
- **Consolidation:**
 - at individual level for stand-alone FE
 - At individual level where FE is part of a third-country group without parent undertaking in the EU
 - At the highest level of the EU consolidation for FE groups recognising supervisory responsibilities of CA under DORA (but the CA receiving the consolidated register for a given group may not be the one supervising each solo entity of this group), i.e:
 - complete consolidated RoI covering all FE types in scope of DORA to integrated CA
 - sectoral group RoI (e.g. banking or insurance) covering all FEs within the scope of consolidation of such group to CA responsible for supervision of such types of FEs (prudential consolidation scope)
 - If it is not possible to consolidate the registers for several FEs of the same group under the responsibility of several CAs, registers should be provided on an individual basis as if the financial entities were not part of a group



3. How to report



- Participating FEs are expected to prepare the files according to **the specification provided by the ESAs** (to be provided by 31 May)
 - Using **draft data point model** (DPM)
 - Using **plain-csv** format
- Participating CAs are expected to submit the files to their CAs through reporting channels specified by the CAs
- CAs will submit the files to the ESAs using the dedicated reporting channel

In the **dry run exercise**:

- FEs should not expect immediate data quality feedback
- FEs will not be expected to resubmit the data based on data quality feedback
- FEs will receive data quality feedback from the ESAs (through their CAs) towards the end of the exercise

In the **steady-state reporting**:

- FEs will be provided with data quality feedback following the submissions and may be required to resubmit the data

Some tools and materials provided for dry run exercise will be in **draft form** and therefore there may be **changes for the steady-state reporting** from 2025 onwards



3. Reporting format: plain-CSV format supported by taxonomy (via JSON files)

- Json files establish links between the column number and the reporting meta data definition of the column data for each table.
- Ex: b_02.01.json

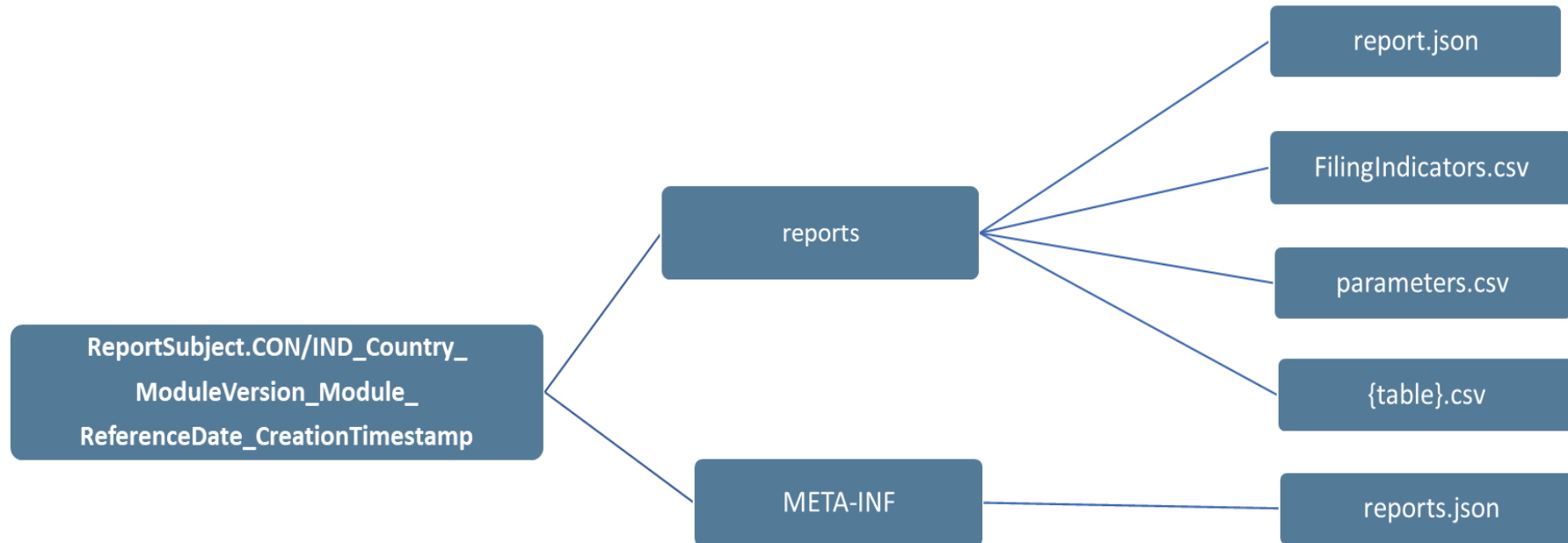
```
    "tableTemplates": {  
      "B_02-01": {  
        "columns": {  
          "c0010": {},  
          "c0020": {  
            "dimensions": {  
              "concept": "eba_met:ei1418"  
            }  
          },  
          "c0030": {  
            "dimensions": {  
              "concept": "eba_met:si1422",  
              "eba_dim:KTQ": "eba_CO:x2"  
            }  
          },  
          "c0040": {  
            "dimensions": {  
              "concept": "eba_met:ei1559",  
              "eba_dim:FGT": "eba_CU:x61"  
            }  
          },  
          "c0050": {  
            "decimals": "$decimalsMonetary",  
            "dimensions": {  
              "concept": "eba_met:mi1310",  
              "unit": "$baseCurrency"  
            }  
          }  
        },  
        "dimensions": {  
          "eba_dim:CRZ": "$c0010"  
        }  
      }  
    }  
  }  
}
```

- With the JSON files defined in the taxonomy package, users can report directly using the column code without needing to consider the meta data definition on metrics and dimensions for each reported data

3. Plain-csv reporting package structure



- ReportSubject.CON/IND_Country_ModuleVersion_Module_ReferenceDate_CreationTimestamp.zip
 - DUMMYLEI123456789012.CON_IT_DORA010100_DORA_2023-12-31_20240821141632000.zip
 - DUMMYLEI123456789012.IND_IT_DORA010100_DORA_2023-12-31_20240821141632000.zip





3. DORA reporting package content

- Each reporting package for one module, one reference date, one reporting subject :

1. report.json



```

{"documentInfo": {...
"extends":
[
  "http://www.eba.europa.eu
/eu/fr/xbri/crr/fws/dora/jc-2023-
86/2024-07-11/mod/dora.json"]
}}

```

2. parameters.csv



name	value
entityID	rs:LElxxxxxxx.IND
refPeriod	31/12/2023
baseCurrency	iso4217:EUR
decimalsInteger	0
decimalsMonetary	-3

3. FilingIndicator.csv



templateID	reported
B_01.01	TRUE
B_01.02	TRUE
B_01.03	TRUE
B_02.01	TRUE
B_02.02	TRUE

* templateID start by "B_xx.xx" in accordance with the draft DPM and not "RT_xx.xx" (contrary to the Final Report), but are the same

4. {table}.csv



Explained on next slide



3. Reporting Data structure in {table}.csv: from template to plain-csv

table: B_02.01.xlsx

B 02.01 - RT.02.01: Contractual arrangements – General Information					
Columns					
Contractual arrangement reference number	Type of contractual arrangement	Overarching contractual arrangement reference number	Currency of the amount reported in RT.02.01.0050	Annual expense or estimated cost of the contractual arrangement for the past year	(CRZ refer the g ICT ti
0010	0020	0030	0040	0050	
999	<Contractual arrangement reference number between the financial entity or, in case of a group, the group subsidiary and the direct ICT third-party service provider>	483176 [Type of contractual arrangement]	Value chosen from: (CO:x1) Standalone arrangement (CO:x2) Overarching arrangement (CO:x3) Subsequent or associated arrangement		



b_02.01.csv



c0010	c0020	c0030	c0040	c0050
ggzulzqb	eba_CO:x1	vzotkox	eba_CU:ALL	429175.36
pzepyque	eba_CO:x2	mlteoyxb	eba_CU:EUR	895534.92



3. Tools to be made available for the FEs

Given the timing of the exercise and ongoing developments, it will be run on the basis of:

- Final Report on the Draft ITS on Registers of Information (published in January 2024)
- Draft Data Point Model (DPM) developed based on the Final Report
- The technical reporting package for the ITS will be finalised by July, so there may be changes compared to draft DPM used for the exercise
- Adoption of the ITS by the Commission is still ongoing, and there may be changes compared to the Final Report

The ESAs will support the FE in preparing their registers for the submission according to the relevant specifications by making available to the participating entities:

- Draft DPM
- CSV specifications and instructions
- Excel based template based on the draft DPM (with dropdowns and formats)
- Optional tool (VBA macro) to assist with the conversion of the Excel templates into CSV files and ZIP files for their submission

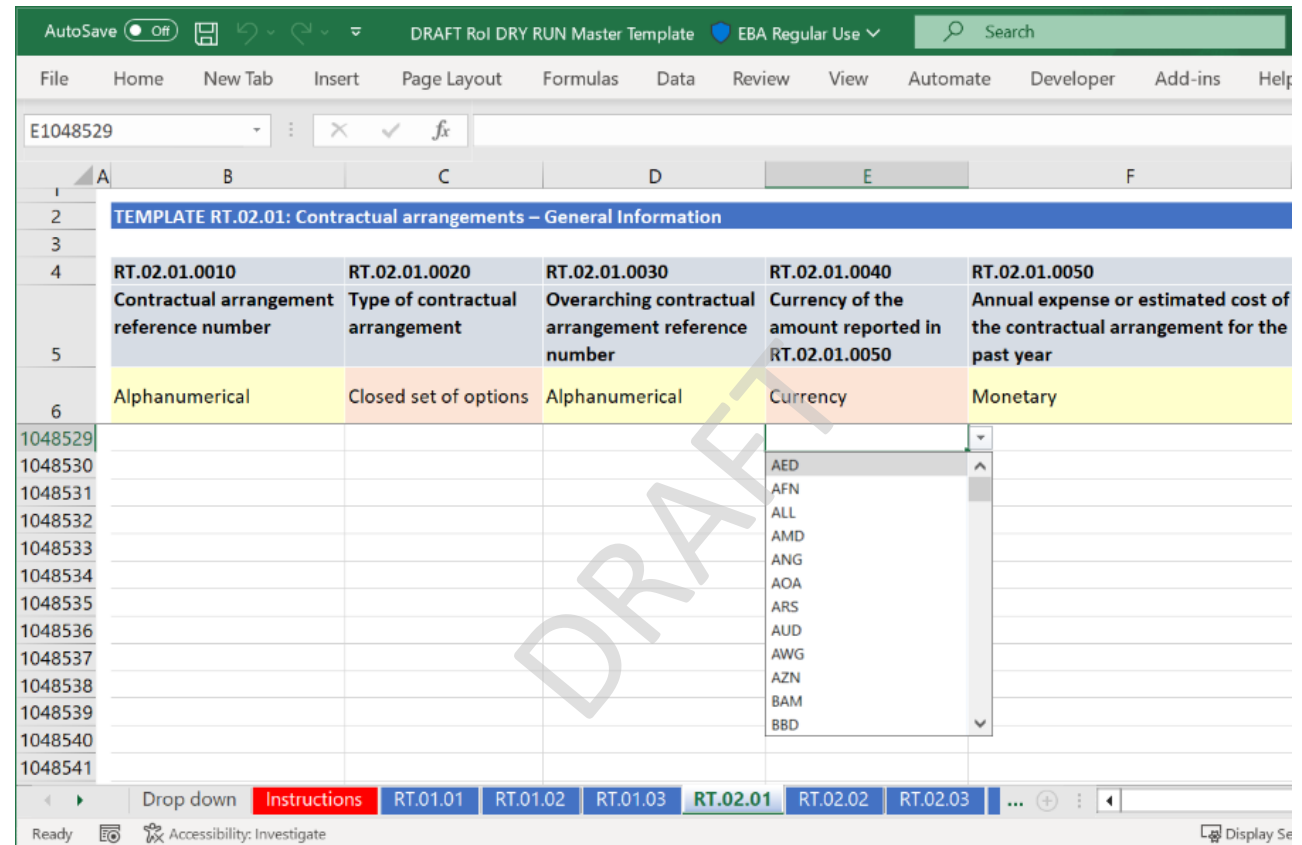
The exercise will be also supported by [FAQ](#)



3. Overview of tools: Excel based template

An **Excel Master template** will be released to facilitate the reporting according to the draft DPM

- Based on ITS RoI
- Drop downs available for closed options based on members of the draft DPM
- Cells formatted
- Protected and locked





3. Overview of tools: Excel to CSV conversion tool (1/3)

- To **assist with the production of the CSV files** to be submitted, the ESAs are making available a **VBA-based tool** that will:
 - Read the content of the Excel template and save it in CSV compliant with the collection requirements (naming conventions, formatting, ...)
 - Check basic data quality and flag errors
 - Produce the files that are necessary for the submission: filing indicators, JSON file
 - Package the files in a zip file ready to be submitted
- The **use of the tool is optional** – if an entity has their own processes in place that create the package according to ESAs specifications, it is not necessary to use the tool

3. Overview of tools: Excel to CSV conversion tool (2/3)

Tool in Excel VBA



Instructions document

eba European Banking Authority | **eiopa** European Insurance and Occupational Pensions Authority | **ESMA** European Securities and Markets Authority

2024 DORA dry run exercise CSVs reporting package generator

- 1 Follow Instructions to fill the XLS templates
- 2 Insert the full path(1) of the folder where the XLS templates completed as per point 1 and to be converted are stored.
Input path: X:\1350 - Risk Infrastructure - DORA\Ad-Hoc Data 2024\DP\Test cases
- 3 Create an empty folder where the output files of the macro will be stored. Insert the full path (1):
Output: X:\1350 - Risk Infrastructure - DORA\Ad-Hoc Data 2024\DP\Out
- 5 You can enter a specific submission date in the cell below, or leave it empty to be filled with the date of creation of CSV
Submission date (Optional)
- 6 Select the consolidation scope of the report
 CON IND
- 7 Select the templates to be submitted:
 R_01_02 R_01_03 R_02_01 R_02_02 R_02_03 R_03_01 R_03_02 R_03_03 R_04_01 R_05_01 R_05_02 R_06_01 R_07_01 R_99_01
- 8 Closed all other Excel workbooks before running the macro
- 9 Press the Start button to launch the macro
Start

DISCLAIMER: This tool has been developed for the purpose of the 2024 DRY RUN exercise only.



eba European Banking Authority | **eiopa** European Insurance and Occupational Pensions Authority | **ESMA** European Securities and Markets Authority

EBA/GL-REC/20XX/XX
DD Month YYYY

Instructions

Tools for reporting the DORA Register of Information (RoI) - 2024 voluntary dry-run exercise

This document provides information and guidance on the use of the Excel template and VBA macro to generate the csv files to be reported to the EBA.



3. Overview of tools: Excel to CSV conversion tool (3/3)

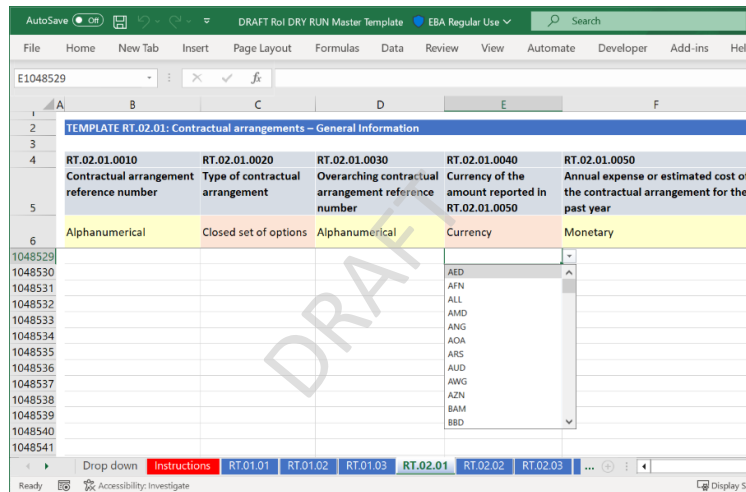
Input



Tool



Output



1

12345678900987600000.CON_AT_DORA010000_DORA_2024-04-24_202404231505414141

- FilingIndicators.csv
Type: Microsoft Excel Comma Separated Values File
- parameters.csv
Type: Microsoft Excel Comma Separated Values File
- report.json
Type: JSON File
- RT.01.01.csv
Type: Microsoft Excel Comma Separated Values File
- RT.01.02.csv
Type: Microsoft Excel Comma Separated Values File
- RT.01.03.csv
Type: Microsoft Excel Comma Separated Values File

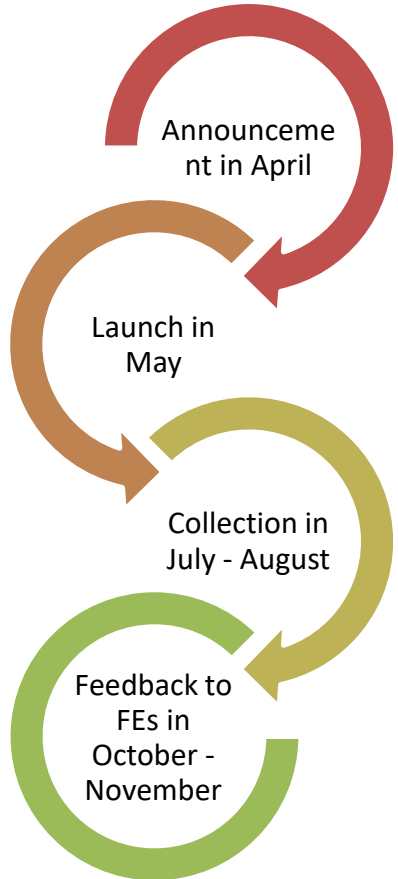
2

ERRLOG_Test Case_202404231505414141

ID	TEMPLATE	CELL	VALUE	Error Description
DOR_0035	RT.03.03	€\$7	LA908793284792387	Wrong format LEI code
DOR_0042	RT.06.01	€\$7	NA	Value not in list.
DOR_0086	RT.07.01	€\$7		Missing Mandatory value



3. Timeline and milestones



- **30 April** – introductory workshop for the industry
- **31 May** – launch for the industry: materials, specifications and tools made available to the participating FEs, and list of involved FEs confirmed by the CAs
- **June-July** – ESAs’ workshops with participating FEs and CAs, FAQ support
- **1 July-30 August** – registers of information collected (no resubmissions envisaged) from participating FEs through their competent authorities (which may set specific deadlines within this window)
- **31 October** – end of the data cleaning and quality checks. Feedback and cleaned files provided to the participating FEs via their competent authorities
- **November** – ESAs’ ‘lessons learnt’ workshop on data quality open to the entire industry
- **Early December** – publication of aggregated data quality report



3. Taking part in the exercise and notifications

Exercise is voluntary for the FEs to take part and is not linked to any landscaping of TPPs or to be used for the CTPP designation purposes

FEs are invited to reach out to the CAs and declare their interest by 31 May

CAs may also reach out to FEs directly and invite them to take part in the exercise.

CAs may consider several options:

- Reach out to the same sample as in 2022 exercise
- Reach out to specific FEs they have in mind

CAs will keep a list of participating FEs and will share them with the ESAs by 31 May

The ESAs can accept also 'late joiners' later in the process, as long as the CA agrees and has been onboarded to the transmission channel



3. Next steps

- All FEs are encouraged to continue preparing their RoI in accordance with the Final Report on draft ITS requirements and **obtain all necessary data, where missing**
- FEs wishing to join the dry run exercise are invited to reach out to their CAs to **declare their participation in the dry run by 31 May**
- The ESAs will release the materials and tools for the exercise by 31 May

3. Reference materials and contacts

- Dry run exercise dedicated [webpage](#) (will be used for the tools and FAQ)
- Final Report on Draft ITS on register of Information [here](#) (includes also illustrative Excel template)
- Email address for questions ESA-DORA-Reporting@eba.europa.eu

4. Question and answers

Thank you for your attention!

Questions?

