

Digital Operational Resilience Act

Q&A

Disclaimer

The Pensions Authority has made every effort to ensure that this document is correct. However, no liability whatsoever is accepted by the Pensions Authority, its servants or agents for any errors or omissions in the information contained in this document or for any loss occasioned to any person acting or refraining from acting as a result of the information in this document.

Version	Date	Comment
Version 1	28/11/2024	First published
Version 2	09/01/2025	Addition of Q4 (new) and supplementary information in Q2
Version 3	17/01/2025	Addition of Q5 and Q6
Version 4	04/03/2025	Edits to Q6 and addition of Q7
Version 5	12/03/2025	Addition of Q8

Table of contents

1. Are pension schemes required to submit registers of information to the Pensions Authority?	3
2. When must pension schemes submit their registers of information to the Pensions Authority?	3
3. Will there be further guidance in relation to the interpretation of ICT services for completing the registers of information?	3
4. What is an LEI and how does my pension scheme obtain one?	3
5. How do I report a major ICT-related incident to the Pensions Authority?	4
6. Can another entity submit a major ICT-related incident report on behalf of the trustees of a pension scheme?	4
7. How do I prepare the register of information (ROI) required under article 28(3)?	4
8. What ICT services may be considered in scope of the Registers of Information requirement following the European Commission clarification regarding ICT services?	5

1. Are pension schemes required to submit registers of information to the Pensions Authority?

Yes, pension schemes with 16 or more active and deferred members must submit their register of information in accordance with article 28(3) of the [DORA regulation](#) to the Pensions Authority for onward transfer to the European Supervisory Authorities (ESAs).

2. When must pension schemes submit their registers of information to the Pensions Authority?

The [joint ESA decision ref 2024 22](#) specifies a reference date of 31 March 2025 for the first registers of information.

Pension schemes should be prepared to submit their register of information (ROI) to the Pensions Authority in the first week of April 2025 based on the 31 March reference date. The Authority will communicate further on the reporting process for pension schemes once arrangements for the collection of registers are finalised.

The ESAs have set out further information on how to prepare for the ROI requirement on [this page](#).

3. Will there be further guidance in relation to the interpretation of ICT services for completing the registers of information?

The Authority understands that a question relating to the definition of ICT services in scope of DORA is under review through the [ESA Joint Q&A register](#).

The Pensions Authority may issue guidance when the ESA Q&A process has concluded.

4. What is an LEI and how does my pension scheme obtain one?

A legal entity identifier (LEI) is a 20-digit, alphanumeric code that uniquely identifies a financial entity.

The LEI of a financial entity is a required field in the register of information (ROI) required under article 28(3) of [DORA](#). See templates B_01.01 and B_01.02 of Annex I of the [implementing technical standards on the templates for the ROI](#).

The LEI is also indicated as a required field in the templates for major ICT-related incident reporting and for voluntary reports of significant cyber threats under article 19 of DORA.

Pension schemes subject to DORA may obtain an LEI from any LEI-issuing organisation listed for Ireland in the table on [this webpage](#).

5. How do I report a major ICT-related incident to the Pensions Authority?

Details of how to report major ICT-related incidents to the Pensions Authority can be found [here](#). This page also includes information on voluntary reporting of significant cyber threats.

6. Can another entity submit a major ICT-related incident report on behalf of the trustees of a pension scheme?

Article 19(5) of the [DORA regulation](#) allows financial entities to outsource the reporting of major ICT-related incidents to a third-party service provider. In such cases, the trustees remain fully responsible for meeting the incident reporting requirements. The legislation does not specify the type of third-party service provider that may or may not submit major ICT-related incident reports for the trustees in accordance with article 19(5).

The relevant [implementing technical standards](#) require pension schemes to notify the Pensions Authority where they outsource this obligation prior to the first notification or reporting and, at the latest, as soon as the outsourcing arrangement has been concluded. They can do this by emailing DORAoutsourcingIR@pensionsauthority.ie, providing the name, contact details, and an identification code of the third-party that will submit the incident notifications or reports for them.

Pension schemes are also required to inform the Pensions Authority where such outsourcing has been cancelled.

7. How do I prepare the register of information (ROI) required under article 28(3)?

The ESAs have published technical package V4.0, available [on this EBA webpage](#). Trustees should monitor this webpage for future updates.

For ease of reference, the ROI template to be used in 2025 is [here](#).

Pension schemes in scope of DORA must prepare their ROI in accordance with the [implementing technical standards on the templates for the ROI](#).

8. What ICT services may be considered in scope of the Registers of Information requirement following the European Commission clarification regarding ICT services?

On 22 January 2025, the European Commission issued a [clarification](#) on what types of services should be considered *ICT services* within the meaning of [DORA](#). In order to determine which, if any, of a scheme's service providers need to be included in the register of information, trustees must carry out an assessment. This [decision tree and the accompanying notes](#) aims to assist trustees in their assessments.