



An tÚdarás Pinsean
The Pensions Authority

The Pensions Authority Conference 2026

Tuesday, 15 September 2026
The Round Room at The Mansion House

The Pensions Authority Conference 2026

Welcome and introduction

Brendan Kennedy

Pensions Regulator
The Pensions Authority



The Pensions Authority Conference 2026

Keynote Address

Dara Calleary TD

Minister for Social Protection and Rural and Community
Development and the Gaeltacht



The Pensions Authority Conference 2026

EIOPA policy and supervisory convergence

Petra Hielkema

Chair of the European Insurance and Occupational
Pensions Authority (EIOPA)

The Pensions Authority Conference 2026

Anticipating the authorisation regime for Irish pension schemes

Andrew Nugent

Director of Supervision, Enforcement, Policy and Legal
The Pensions Authority

www.pensionsauthority.ie



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Update on key issues

Andrew Nugent

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Pensions landscape

at September 2026

Group DC
schemes

4.6k

DB schemes
(subject to
Funding
standard)

422

OMAs

40.6k

Active members
(DC,DB, public sector)

1.4 million

Scheme and PRSA
assets

€176 billion

Master
Trusts

19

RAs

84

PRSA
contracts

373k



DC consolidation

- Unresolved schemes now account for c. 3.7% of scheme assets
- 94.8% of assets are in ongoing schemes
- A further 1.5% are in OMAs or group schemes in wind-up
- Significant progress has been made and the end state is emerging
- Authority is working with providers to appoint trustees where they cannot be found
- Reconciliation work underway to establish status of schemes where there is poor data



DC scheme consolidation

DC schemes at 1 September 2026

Scheme type	At Jan '23	At Sept '26	Reduction
OMAs	141,500	40,644	71%
Group	17,500	4,606	74%



Master trusts

Master trusts

- **12** Group scheme master trusts; and
- **7** Retail master trusts for one member arrangements (OMAs)

June 2023

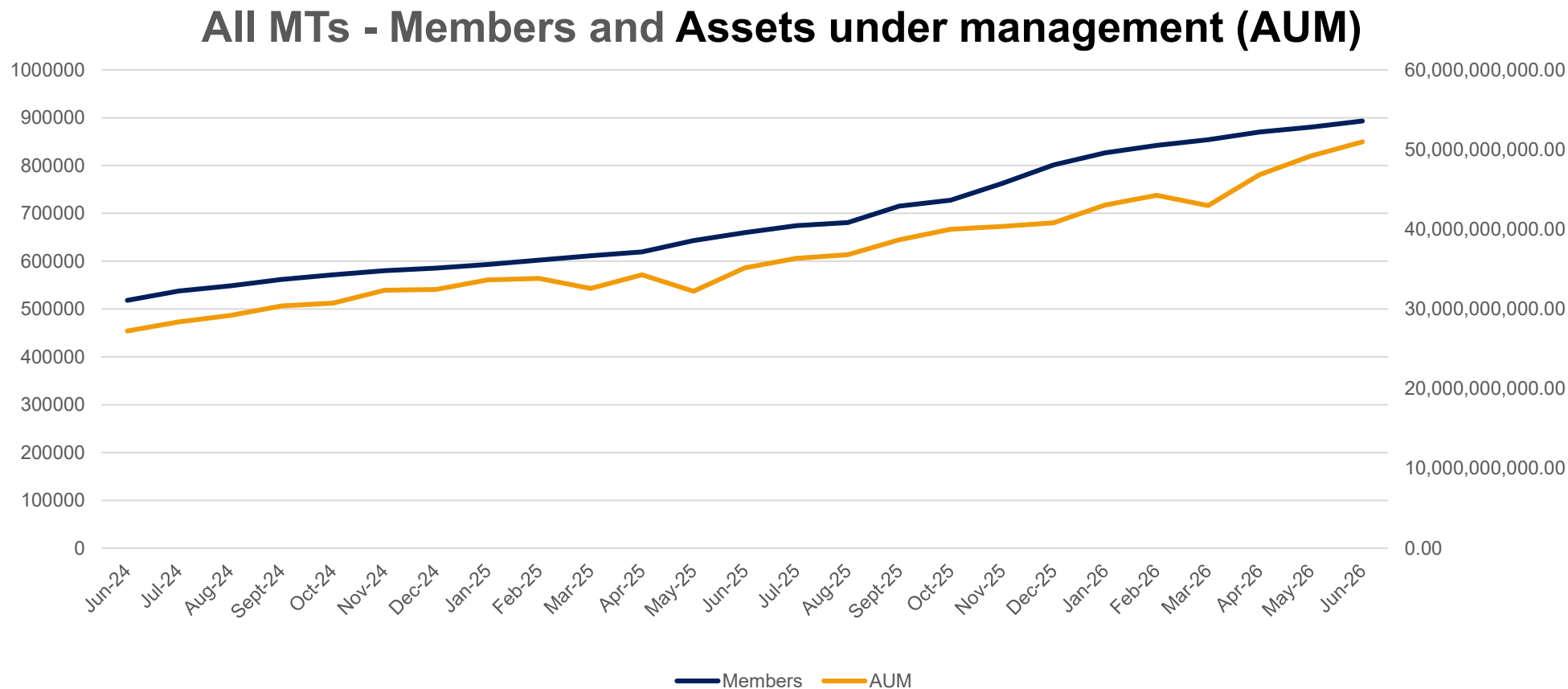
- Members 315k
- Assets under management (AUM) €13.9bn
- Participating employers 15k

June 2026

- Members 893k
- Assets under management (AUM) €50.9bn
- Participating employers 53.7k



Master Trusts – June 2026



Members (active and deferred): 893k at end of June 2026

Assets under management: €50.97bn



PRSA's

PRSA's Q1 2023

- Assets €9bn
- Contracts 237k

PRSA's Q2 2026

- Assets €27bn
- Contracts 373k



Authorisation

Pensions Authority expectation of schemes seeking authorisation:

- Most DB schemes – normal attrition, impact of deferred annuity option
- Master trusts
- C. 200 DC group schemes who have notified PA of appointed KFHs and intent to remain stand-alone

The above are considered ‘ongoing’ schemes.



Authorisation regime

In legislative process, however Authority expectation is:

- Schemes will need to demonstrate up-front compliance with requirements
- Electronic process to extent possible
- Authority will create application form and guidance for applicants
- Staggered basis commencing with master trusts
- Likely to be capable of authorisation if scheme has successfully been through Authority SRP process



In-scheme drawdown (ISD)

- Priority for PA
- 22 responses to PA consultation, 20 questions posed
- PA has reviewed all submissions and is now developing proposal on regulatory framework for ISD
- Likely that legislation and guidance is needed
- Matters raised include clarity of extent of trustee responsibility, design of drawdown, disclosures, transfers, pension adjustment orders.





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Tea / coffee break

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Data at the centre of supervision

Eithne Rafferty

Head of Strategy and International Affairs
The Pensions Authority

Three key messages

Better data
enables better
supervision

Data quality is a
trustee
responsibility

Better data
supports better
outcomes for
pension savers

Why pension supervision is changing



MORE COMPLEX
REGULATORY
ENVIRONMENT



LARGER, MORE
SOPHISTICATED
PENSION SCHEMES



INCREASE FOCUS ON
GOVERNANCE AND
RESILIENCE



HIGHER
EXPECTATIONS FOR
MEMBER OUTCOMES



SHIFT TO RISK-BASED,
EVIDENCE LED
SUPERVISION



RELIABLE DATA IS
ESSENTIAL FOR
EFFECTIVE
OVERSIGHT

Data as the foundation of supervision



FOCUS ON RISKS TO
MEMBERS



IDENTIFY
VULNERABILITIES
BEFORE THEY
EMERGE



MONITOR TRENDS
ACROSS SCHEMES



SUPPORT EARLIER
SUPERVISORY
INTERVENTION



ENABLE FASTER,
BETTER DECISIONS



PROTECTION
PENSION SAVER
OUTCOMES

Data quality is a trustee responsibility



Trustees are accountable for data quality



Administrators maintain controls and validation



Service providers ensure robust data processes



Accurate data supports better decisions



Reliable reporting is a regulatory obligation



Strong foundations enable better supervision

Integrated Pension System (IPS): Building the foundation



Fundamental shift in how supervisory information will be collected



Foundation for data-driven supervisory framework



Accountability enhancements

XBRL implementation

XBRL rollout timeline

- Phase 1 (Nov 26)
 - Master Trusts
 - Largest DB & DC schemes
- Must pass validations
- ****New template****
- Schemes > €1 billion
- Open derivatives template



XBRL implementation

XBRL Rollout Timeline

Full rollout for in-scope schemes

- 31 December 2026 reporting data
- Quarterly (Feb 27)
- Annual (April 27)



XBRL enables future supervision

Standardisation

Comparability

Validation

Data Quality

Additional supervisory data collections

- Trustee Annual Report
- ORAs
- SIPP
- Minutes
- Quantitative questionnaires



Better data supports better outcomes



Better data delivers
better insight



Better insight
supports better
decisions



Strong governance
depends on reliable
information



Evidence supports
effective oversight
and challenge



Data helps identify
and manage
emerging risks

Data across the supervisory lifecycle



DATA SUPPORTS
AUTHORISATION AND
SUPERVISION



ENABLES
ASSESSMENT OF
GOVERNANCE AND
RESILIENCE



SUPPORTS ONGOING
RISK-BASED
SUPERVISION



IMPROVES
TRANSPARENCY AND
CONSISTENCY



REPORTING
EXPECTATIONS
CONTINUE TO
INCREASE

Preparing for the future

- Greater focus on comparable, trusted information
- Reporting requirements will continue to grow
- Data obligations are governance issues
- Trustees should assess data readiness now

IORP data
reporting

DORA

SFDR

ESAP

Enhanced
IORP
reporting

Three takeaways

Better data
enables better
supervision

Data quality is a
trustee's
responsibility

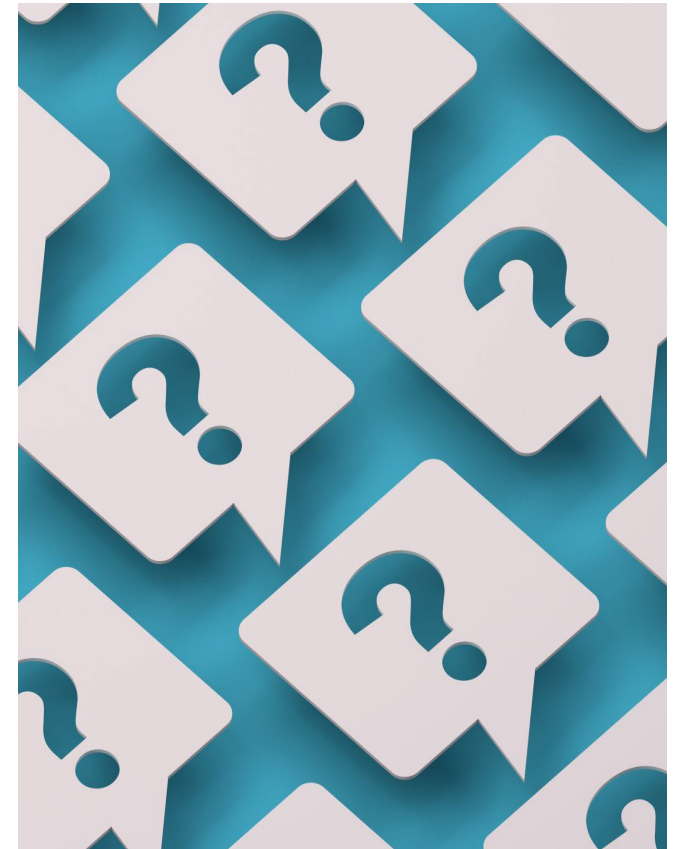
Better data
supports better
outcomes for
pension savers

Questions?

Thank you for listening.

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Ensuring cyber security is embedded as a critical risk

Paul Stanley

Head of Engagement

The National Cyber Security Centre (NCSC)

Department of Justice, Home Affairs and Migration

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Forward-looking risk-based supervision

Regulating for Resilience

15/09/2026



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TLP: CLEAR



Why do F1 cars have incredible brakes?

Cyber is a major global risk ... and it is not going away

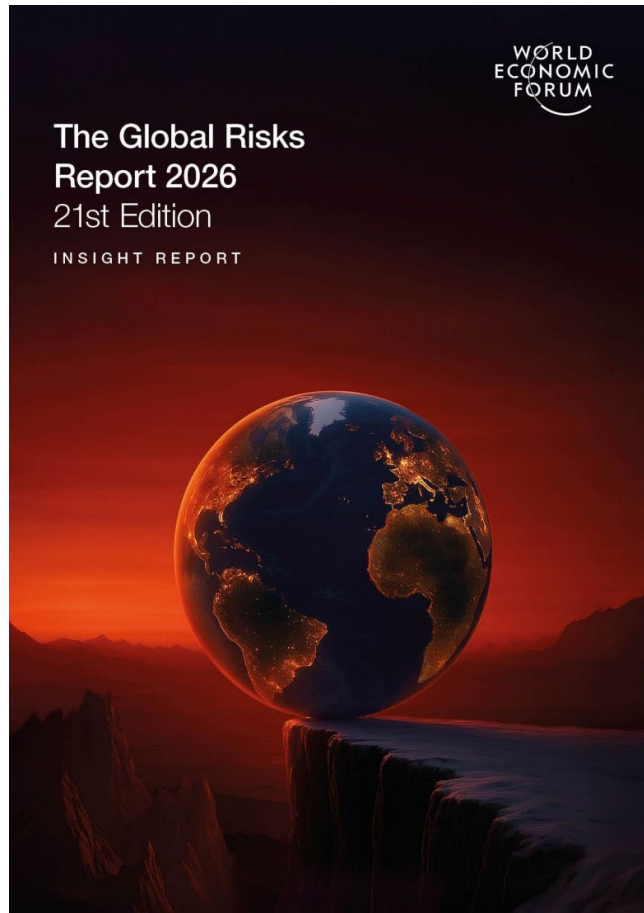


FIGURE 3

Global risks ranked by severity, short term (2 years) and long term (10 years)

Please estimate the likely impact (severity) of the following risks over a 2-year and 10-year period.

Short term (2 years)

1. Geoeconomic confrontation
2. Misinformation and disinformation
3. Societal polarization
4. Extreme weather events
5. State-based armed conflict
6. Cyber insecurity
7. Inequality
8. Erosion of human rights and/or of civic freedoms
9. Pollution
10. Involuntary migration or displacement

Long term (10 years)

1. Extreme weather events
2. Biodiversity loss and ecosystem collapse
3. Critical change to Earth systems
4. Misinformation and disinformation
5. Adverse outcomes of AI technologies
6. Natural resource shortages
7. Inequality
8. Cyber insecurity
9. Societal polarization
10. Pollution

Source

World Economic Forum Global Risks Perception Survey
2025-2026

Risk categories

Economic Environmental Geopolitical Societal Technological

About the NCSC

What we do...

1



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Mission

The Mission of the National Cyber Security Centre is



***to Lead Ireland's Response to
Cyber Risk***



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Strategic Objectives

5 Strategic Objectives between 2025 – 2028



Protect and Defend against Threats in the Cyber Domain



Build Capacity and Embed Cyber Resilience



Oversight and Compliance



National and International Engagement, Collaboration and Coordination



Transformation of Technology, Digital and Supporting Services



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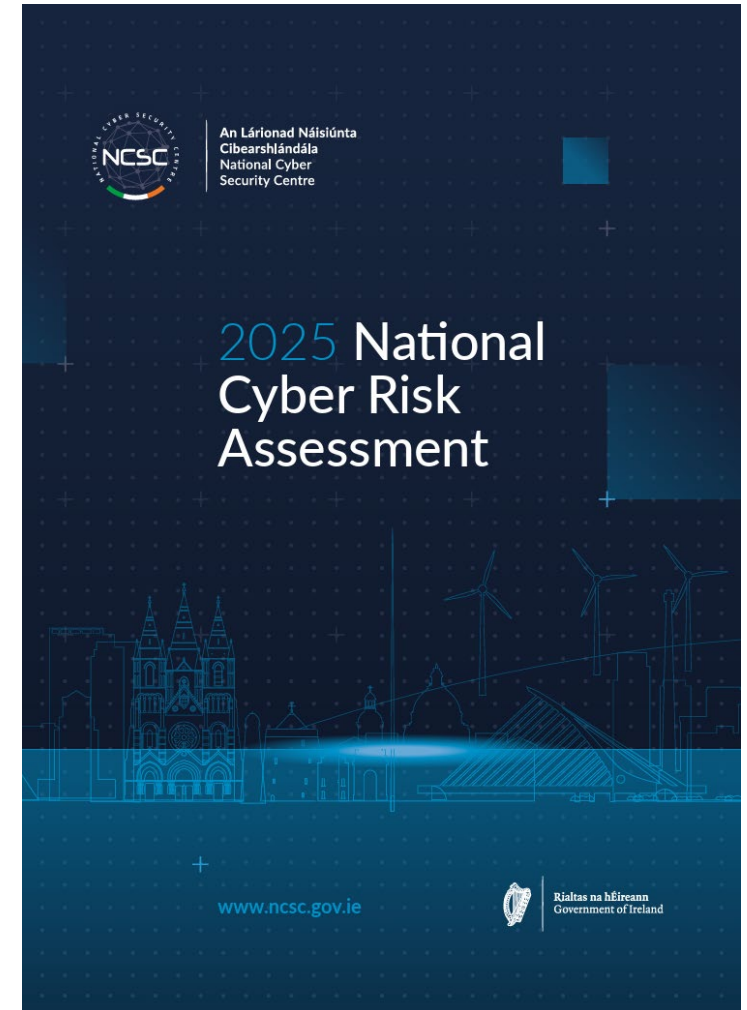


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National Cyber Risk Assessment

Three High Level Risks Identified

- the dynamic geopolitical environment,
- evolving technology and its implications on security, and
- supply chain security.
- <https://www.ncsc.gov.ie/ncra/>



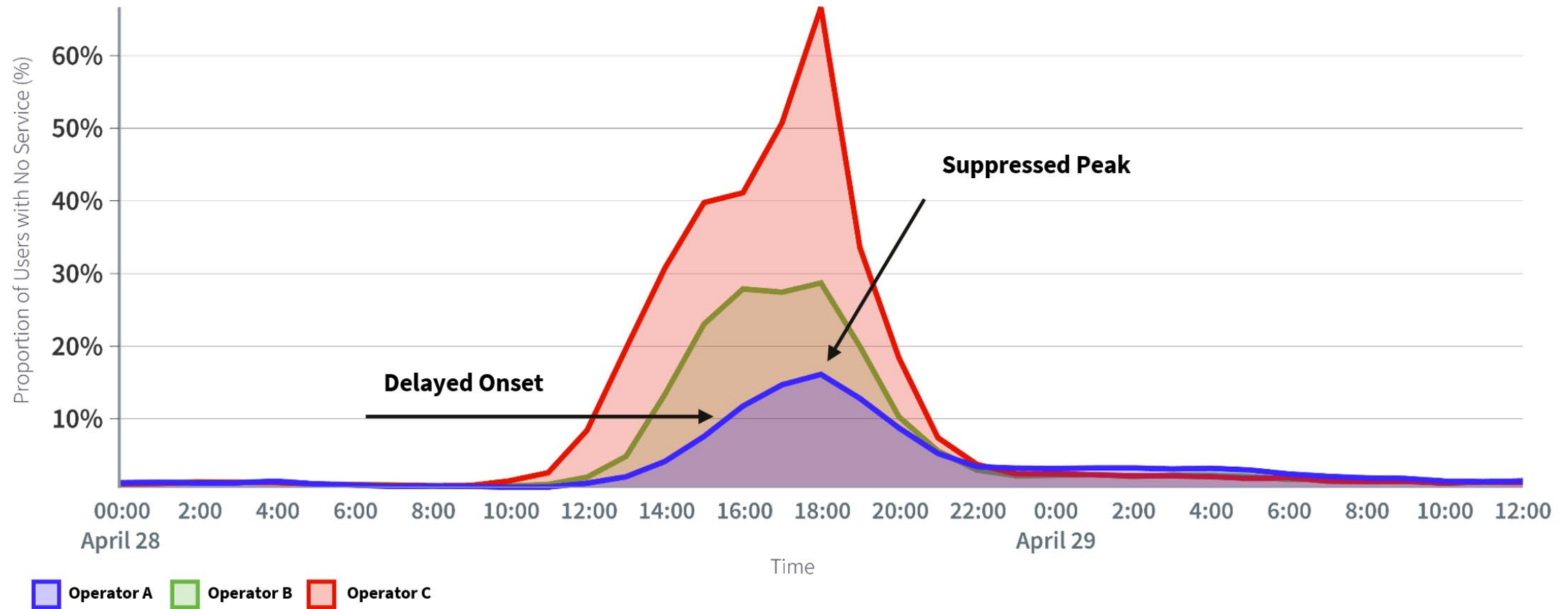
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Why do we need cyber resilience?

Cyber resilience is about **limiting the impact** and enabling **rapid recovery**



Unprepared

– High Impact, Prolonged Disruption

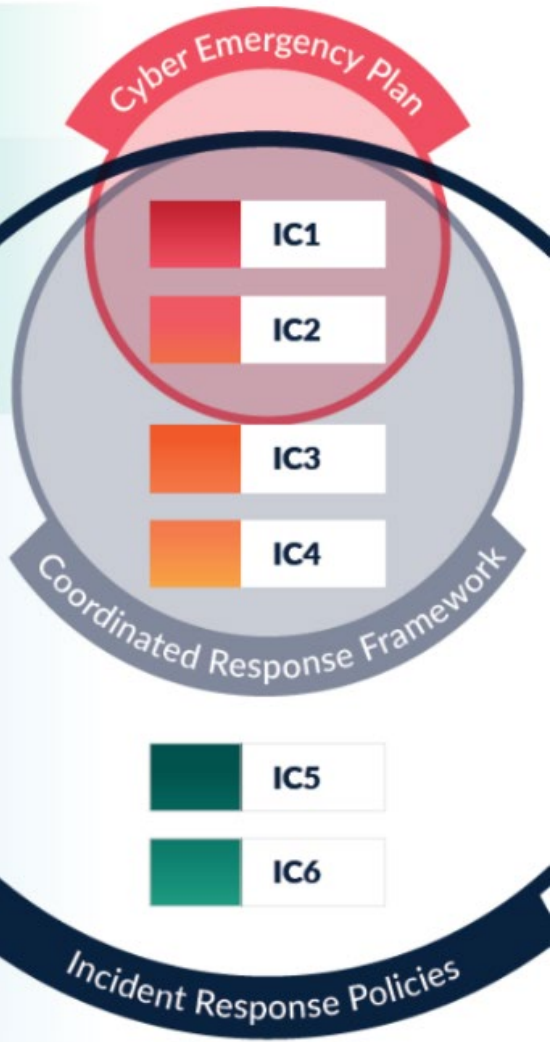
Resilient –

Flattened Curve through Preparation
& Recovery

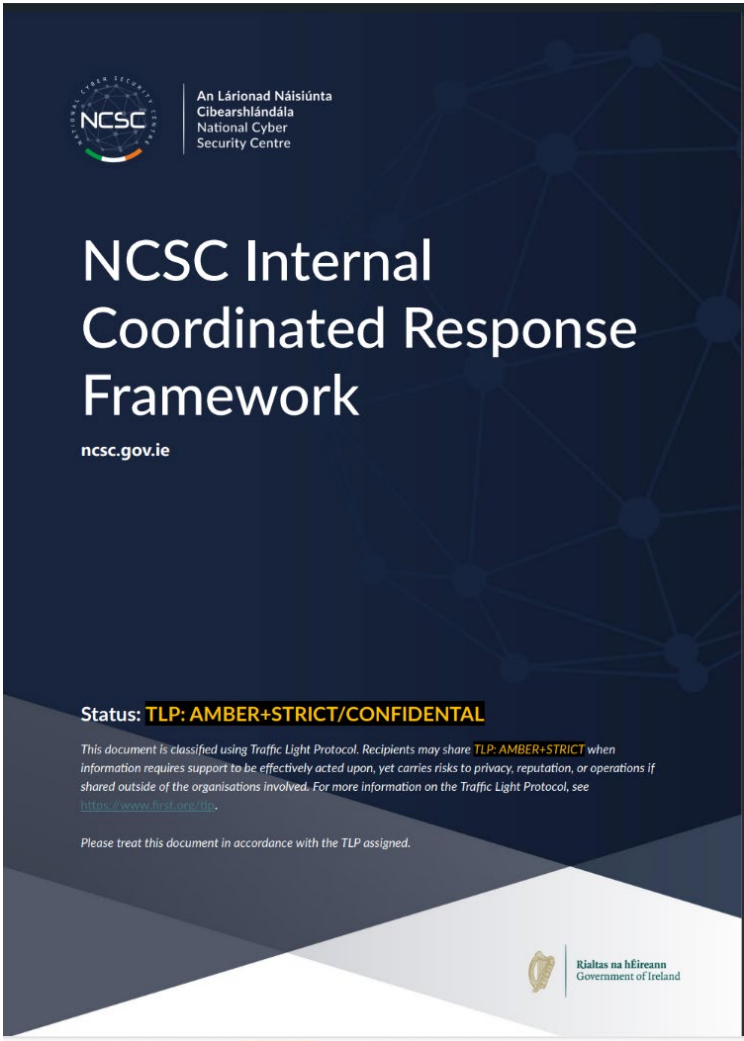


Incident Management and Response

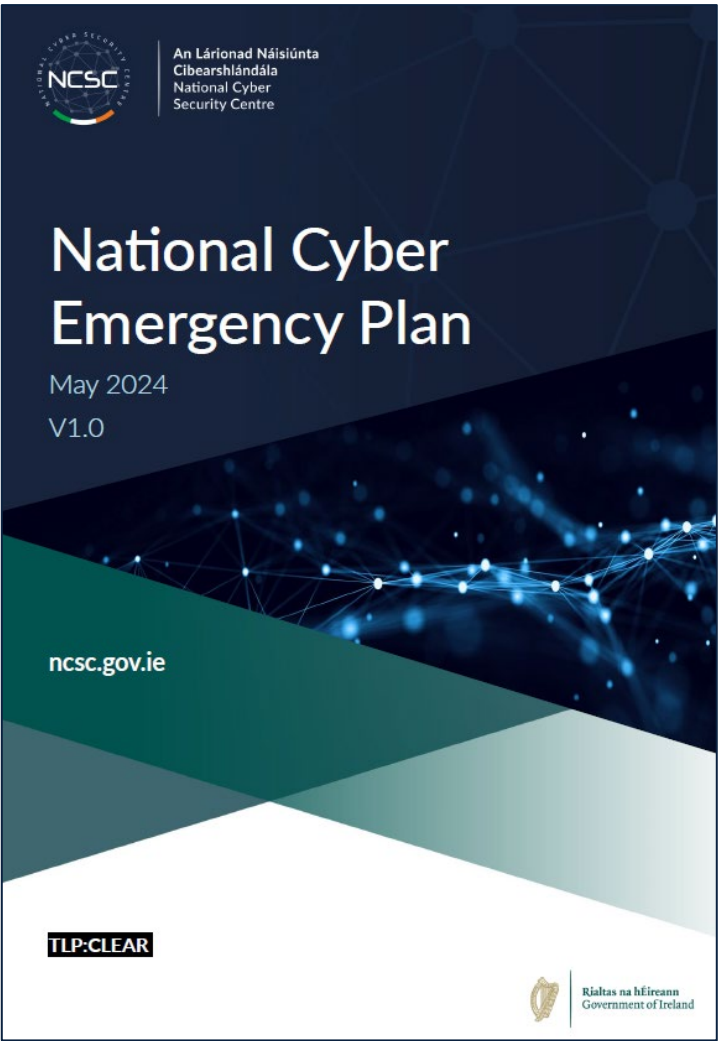
CSIRT



Internal



National



The work to be done...

The Regulatory Landscape

2



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Progressive Legislation



NIS Directive (2016)

First EU-wide cyber directive which aimed to enhance the cybersecurity of critical infrastructure obliging operators of essential services to manage security risks and report significant incidents.

Critical Infrastructure



Wider Economy



NIS2 Directive (2022)

NIS2 expands the scope to more sectors, strengthens security requirements, and introduces stricter supervisory measures and enforcement.

Cyber Security Act (2019)

Establishes a framework for EU-wide cybersecurity certification schemes for ICT products, services, and processes.

Cyber Certification



Secure By Design/Default



Cyber Resilience Act (2024)

Mandatory cybersecurity requirements for products with digital elements, aiming to ensure that hardware and software products are designed, developed, and maintained with robust cybersecurity features throughout their lifecycle.

ECCC Regulation (2021)

This regulation creates a central EU Cybersecurity Competence Centre to pool resources and expertise, drive research and innovation, and enhance the EU's cybersecurity industrial base and competitiveness.

Skills, Research, Industry



Monitoring, Detection & Response



Cyber Solidarity Act (2024)

Creating a European Cyber Alert System for detecting and responding to threats, establishing a Cybersecurity Emergency Mechanism with a reserve of incident response companies, and setting up an EU-wide alert system.

National Competent Authorities (NCA)

Federated Model



NCSC will be NCA Coordinator.

- Act as National Single Point of Contact (SPOC)
- Establish and chair an NCA Forum.
- Assist new NCAs to build capacity.
- Standardise guidance on Security Measures, Audit Methodology and Incident Reporting.



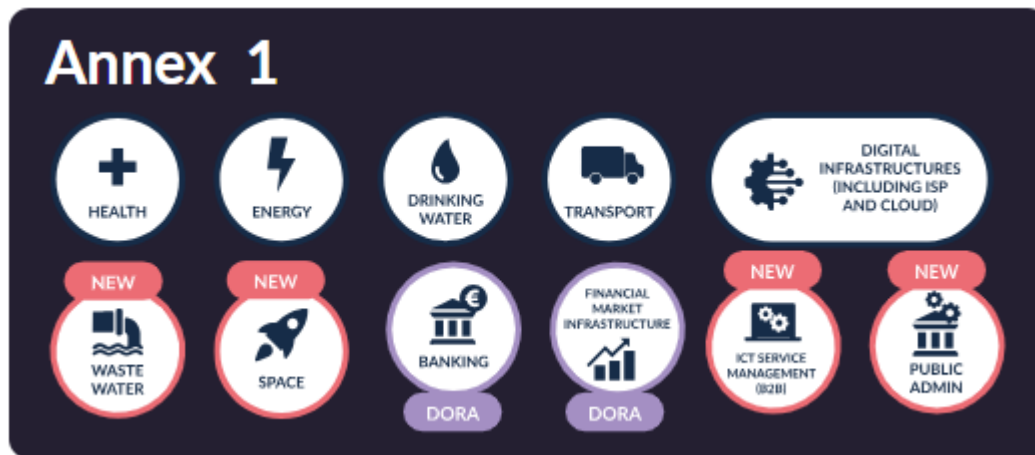
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NIS 2 Entity Types

Annex 1 – Essential - High Criticality



Annex 2 – Important sectors



Oversight and Accountability

Cybersecurity is the board's responsibility

- Member States shall ensure that the management bodies of essential and important entities **approve the cybersecurity risk-management measures** taken by those entities in order to comply with Article 21, **oversee its implementation** and **can be held liable for infringements by the entities** of that Article.
- Training to gain knowledge and skills to enable them to identify risks and assess cybersecurity risk-management practices.

Most important sentence in the Directive



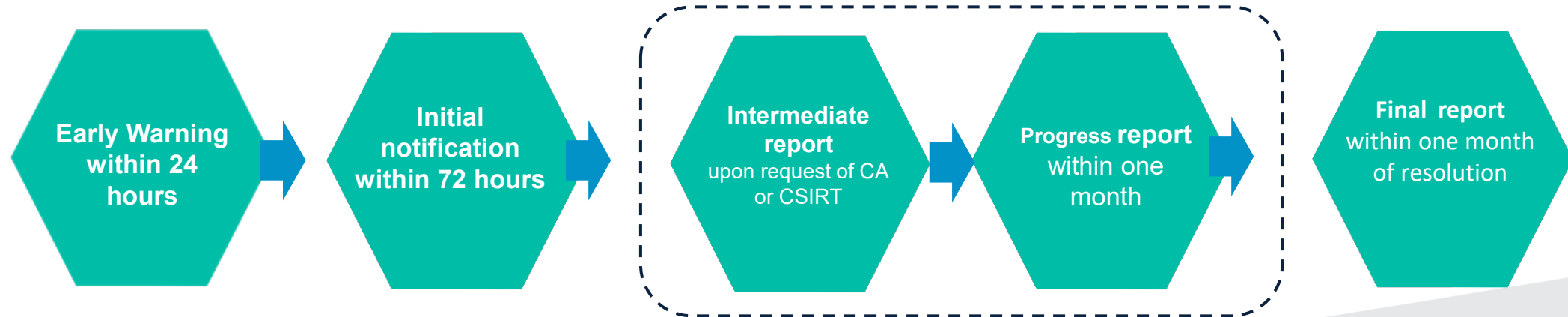
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Incident Reporting (Art 23)

- All significant incidents must be reported to NCSC within 24hrs.
- Significant Incident:
 - Anything which affects or is capable of affecting operations or causing financial loss.
 - It has affected or is capable of affecting other natural or legal persons by causing considerable material or non-material damage



What's next...

NCSC information and supports

3



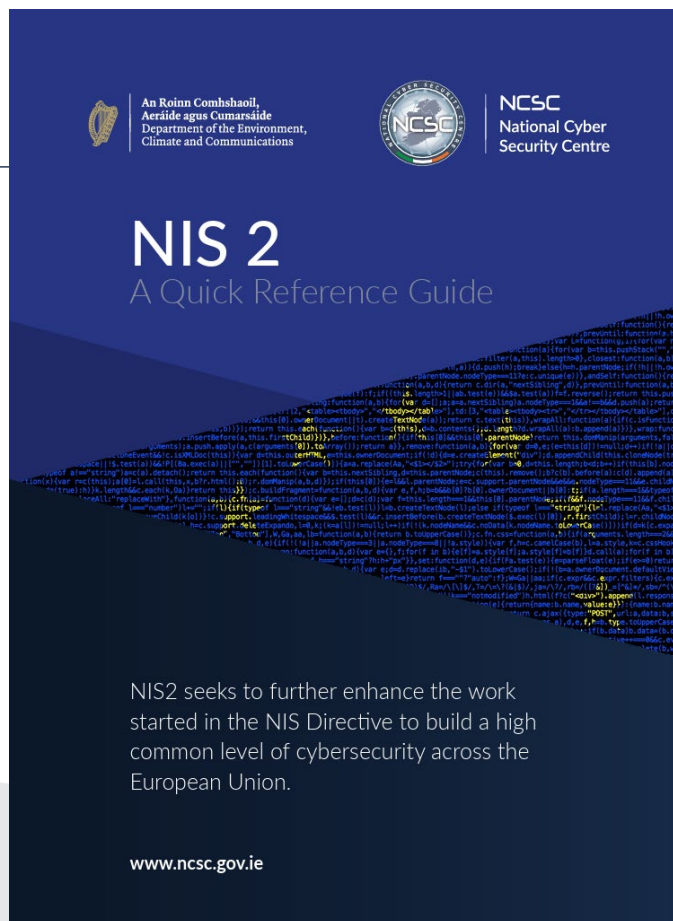
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Am I in Scope?

<https://ncsc.gov.ie/nis2/amiinscope/>



NIS2 AM I IN SCOPE?

Question 1



Do you provide your service in Ireland OR do have your main establishment in Ireland OR do you provide publicly available electronic communication services or public electronic communication networks in Ireland?

Yes ?

No

The 'Am I in Scope' tool is an informal tool designed to assist with understanding the NIS2 Directive. The results of this guide are purely indicative and cannot be used as a basis for non-registration.

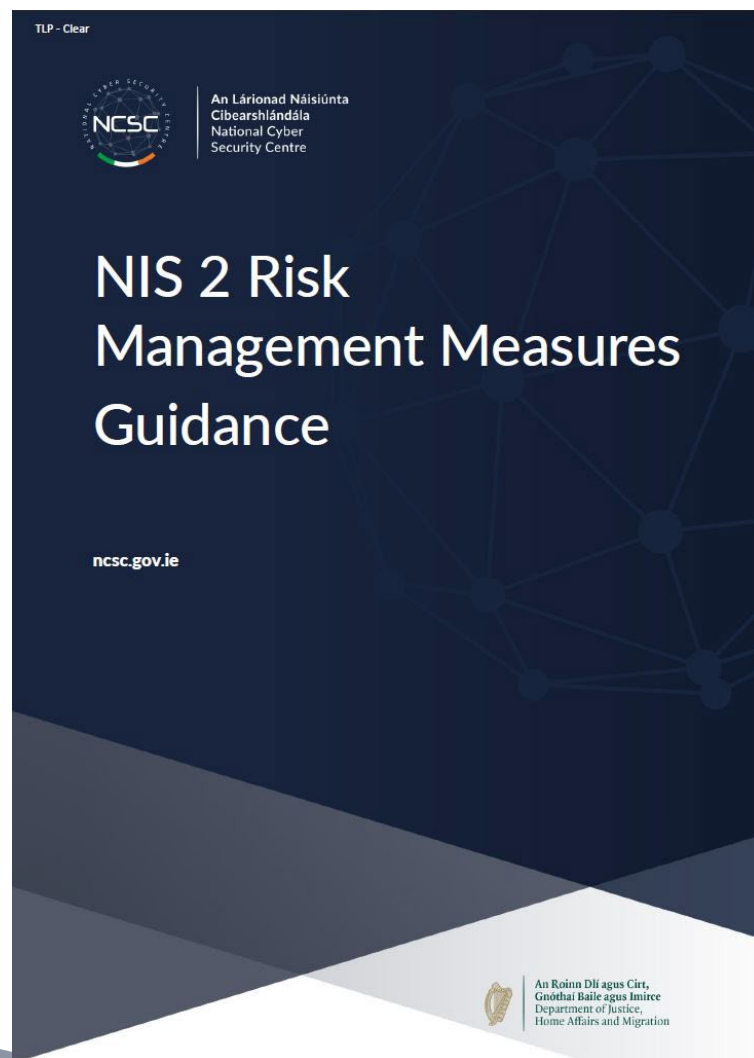


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Draft Risk Management Measure Guidance



[TLP - Clear]

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NIS2

Article 29, Cybersecurity information-sharing arrangements

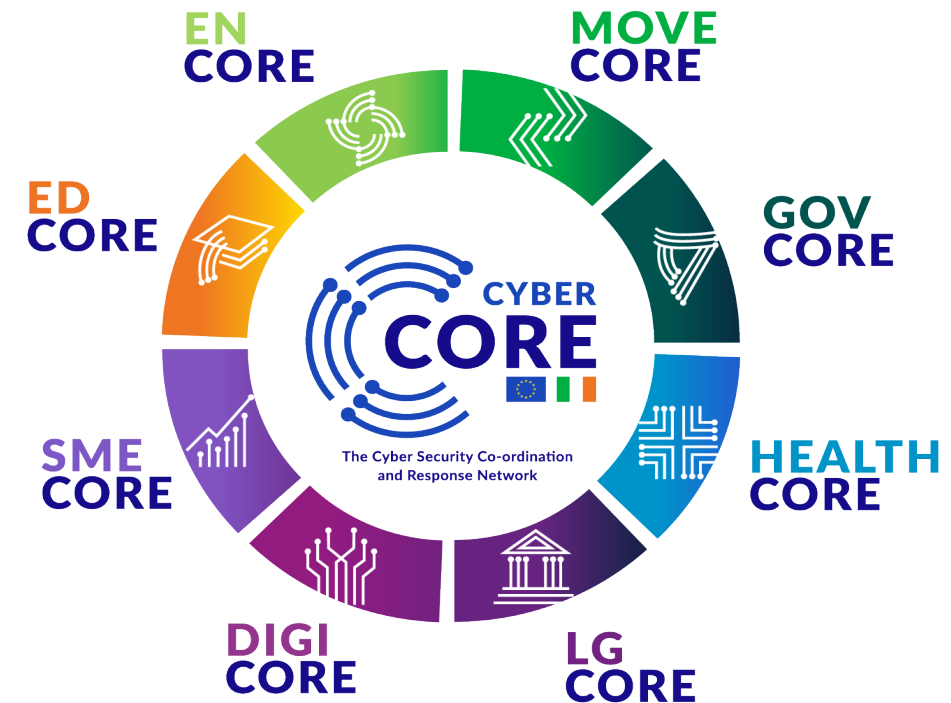
1. Member States shall ensure that entities falling within the scope of this Directive and, where relevant, other entities not falling within the scope of this Directive are able to **exchange on a voluntary basis relevant cybersecurity information among themselves**, including information relating to cyber threats, near misses, vulnerabilities, techniques and procedures, indicators of compromise, adversarial tactics, threat-actor-specific information, cybersecurity alerts and recommendations regarding configuration of cybersecurity tools to detect cyberattacks



Sector specific CORE Establishment

Primary Objective

To establish, mature and maintain efficient and effective Cyber information sharing groups (COREs) across the Government, Energy, Digital, Health, Local Government, Transport, and Education sectors, tailored to the unique needs of each sector, and ensure their sustainability over a 36-month period (and beyond).



SME CORE

New website launched

- sme.ncsc.gov.ie
- Plain language practical information for SMEs.
- Audience: 250,000
- Video content



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Cyber Fundamentals

- EU Wide Certification scheme
- Ireland are co-owners with Belgium, Malta and Romania
- Risk and proportionality are at its heart
- Selection Tool to help entities determine what level they should aim for



CyFun currently set out 3 levels of assurance

ESSENTIAL

140 Controls

100% of attacks countered*

IMPORTANT

117 Controls

94% of attacks countered*

BASIC

34 Controls

82% of attacks countered*

What's next...

Artificial Intelligence

4



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The landscape is moving fast

The last 12 months



PUBLIC SECTOR AI GUIDELINES 2025:

Sets the overarching framework for the public sector



NATIONAL CYBER RISK ASSESSMENT 2025:

Evolving technology Identified as one of three systemic risks to the State



NATIONAL DIGITAL AND AI STRATEGY 2026:

Sets the adoption ambition



ENISA'S VIEW ON CYBERSECURITY IN THE FRONTIER AI ERA JULY 2026:

Enisa response to developments



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“ The secure deployment of AI can transform the delivery of public services through increased operational efficiency and effectiveness.

”



AI as a Threat

Addressing new risks related to AI

Targeted Global fraud

Decrypt · 1d

DOJ Charge Fake North Korean Devs 'Embedding' In Crypto Startups

Federal prosecutors claim DPRK agents infiltrated a blockchain startup under false identities, pushing code to drain funds.



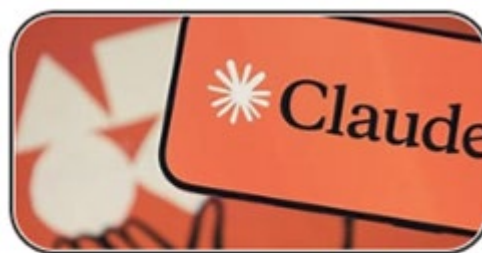
'Industrial-Scale' Asian Scam Centers Expand Globally

2025-04-24 · Dark Reading

Automation of attacks



Anthropic reports the first 80-90' cyber espionage ...



Hacker used Anthropic's Claude in Mexican government data breach ...

Hallucinations



Lawyers face sanctions for citing fake cases with AI, warns UK judge

2025-06-06 · Reuters



Slopesquatting: When AI Agents Hallucinate Malicious Packages | Tren...

Deepfakes and identification



CNN

<https://www.cnn.com/asia/deepfake-cfo-scam-hong-k...>

Finance worker pays out \$25 million after video call ...

4 Feb 2024 · A finance worker at a multinational firm was tricked into paying out \$25 million to fraudsters using deepfake technology to pose as the company's chief financial officer in a video conference...



New vulnerabilities ..

DataBreachToday · 15d

Copilot AI Bug Could Leak Sensitive Data via Email Prompts

A well-phrased email was all an attacker would have needed to trick Microsoft Copilot into handing over sensitive data, until ...



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Artificial Intelligence – Recent Developments

- Project Glasswing, Anthropic's safety pilot of its Claude Mythos model grants selected technology developing companies limited pre-access to detect and patch vulnerabilities before Mythos, or comparable capabilities are widely available.
- These capabilities are expected to trigger a wave of vulnerability disclosures and create unprecedented pressure on vulnerability management processes, particularly for organisations running legacy systems or end-of-life software where remediation options may be limited, open-source software supply chain and network perimeter security devices.
- Other AI labs are expected to reach comparable capability within 6-12 months.



AI Adoption

Implementing AI but security concerns are barrier to adoption



Adoption Pattern

- Cloud-based LLMs dominant use case
- Majority plan to pilot or extend solutions in 12 months
- Access to tools is uneven
- Agentic AI on the horizon



Highlighted risks

- Shadow AI use flagged by 90%+ of respondents
- Data quality & data protection
- Supply chain exposure
- Rapid pace of development
- Governance is a concern



Capability Gap

- Most at early stages of adoption
- AI-specific monitoring capability is limited
- Lacking clear practical guidance
- Looking to NCSC IE for support



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AI as a Tool

Using AI to Defend in cyber security, from reactive to proactive approach



Use of AI and automation improving response (24/7)



Enhanced risk Identification and classification



Fraud detection



Regulatory compliance



Improved learning environments



Secure development



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Why do F1 cars have incredible brakes?

Contact Us

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(round table discussion)

Joyce Brennan

Chief Executive, The Irish Association of Pension Funds (IAPF)

Brian Balmforth

Head of Function - Domestic Life Insurance Supervision, The Central Bank of Ireland

Paul Stanley

Head of Engagement, The National Cyber Security Centre (NCSC)

John Gethin

Director of Strategy, IT, Data and Operations, The Pensions Authority

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Closing comments

John Gethin

Director of Strategy, IT, Data and Operations
The Pensions Authority



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