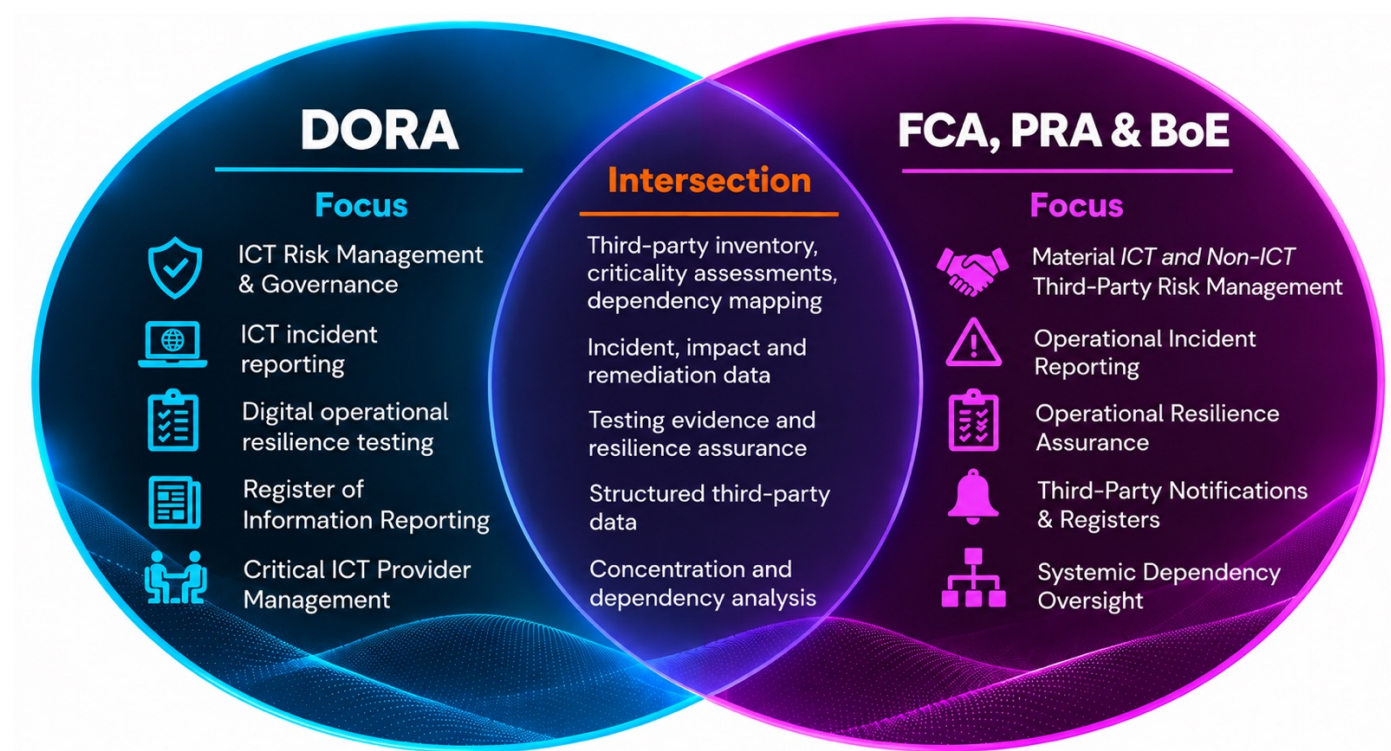


From DORA to UK Regulatory Reporting

Building One Third-Party Data Foundation for Multiple Regulatory Regimes

Many firms have invested heavily in DORA compliance. The challenge now is determining whether those investments will reduce the burden of future FCA and PRA reporting requirements or whether firms will create a second reporting framework alongside the first.

While DORA and the forthcoming UK reporting regime have different objectives, both require visibility over many of the same underlying risks: critical third parties, service dependencies, concentration risk, operational incidents, governance and resilience.



Data-Driven Regulatory Oversight

Regulatory scrutiny is increasingly extending beyond governance frameworks to the quality, structure and evidence within the underlying data.

Regulators want to understand:

- Which third parties support critical services.
- Where concentration risks exist.
- How incidents affect firms and customers.
- How quickly firms can identify, assess and report emerging issues.
- Metrics and MI used to assess effectiveness of supporting governance.

The direction of travel is clear. Regulatory expectations are moving toward more structured, timely and evidence-based reporting.

Reporting Burden or Oversight Advantage?

As regulatory reporting and governance requirements continue to expand, firms must decide how best to meet these obligations efficiently, effectively and at scale.

One approach is to build separate reporting processes for each jurisdiction, regulator and framework. While this may provide a short-term solution, it often creates duplicated effort, fragmented datasets and inconsistent information across multiple regulatory submissions. As reporting obligations continue to evolve, these inefficiencies can increase operational costs, reduce transparency and make it more difficult to demonstrate effective governance and control.

KEY PERSPECTIVE

Governance and Operational Debt



The choice is not between two reporting frameworks. It is between managing multiple disconnected datasets or managing one trusted source of operational resilience information capable of supporting numerous reporting obligations – eliminating potential governance and operational inefficiencies.

Operationally Efficient Approach

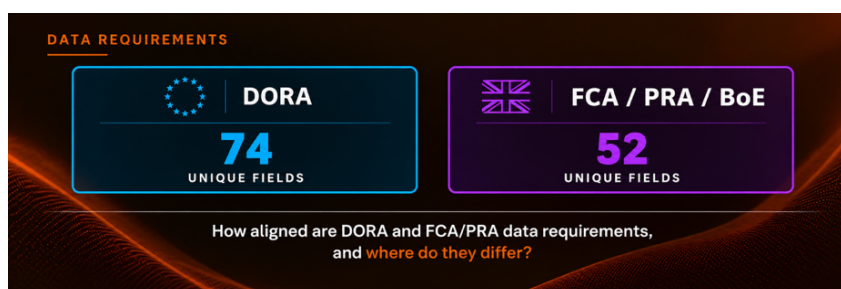
An alternative approach is to recognise that many reporting obligations draw upon the same underlying resilience data. In practice, a significant proportion of the information required for future FCA and PRA reporting requirements may already exist within DORA governance, inventory and incident management processes.

The same third-party inventory may support:

- DORA Register of Information submissions.
- FCA/PRA material third-party reporting.
- Board reporting.
- Operational resilience assessments.
- Supplier risk management activities.

Similarly, the same incident information may underpin:

- DORA incident reporting.
- FCA operational incident notifications.
- Internal governance reporting.
- Root cause analysis.
- Lessons learned programmes.



Rather than creating multiple reporting processes, greater value will be achieved by establishing a single source of truth capable of generating multiple regulatory outputs. This improves oversight, strengthens data quality and provides management with a clearer understanding of operational dependencies and emerging risks.

The objective is not simply regulatory reporting, but effective oversight.

Building a Common Information Foundation

Accurate third-party inventories, interconnected service mappings and structured incident data provide benefits far beyond regulatory submissions.

They support better decision-making, improved risk management, stronger governance and more effective responses when disruption occurs.

Tangible benefits include:

- Reduced duplicated reporting effort.
- Improved consistency across submissions.
- Accelerated incident reporting.
- Enhanced management information quality.
- Strengthened regulatory readiness.
- Improved visibility of emerging supplier risks.

The long-term challenge facing firms is not regulatory reporting. It is maintaining consistent and reliable oversight of increasingly complex third-party ecosystems.

DORA, FCA reporting requirements, operational resilience frameworks and future regulatory obligations are all drawing upon many of the same underlying data sources. Firms that establish a common third-party data foundation today will be better positioned to satisfy future reporting requirements while simultaneously improving governance, resilience and risk management.

The question is no longer whether firms have the data. It is whether that data is sufficiently connected, governed and reusable to support multiple regulatory objectives from a single source of truth.



Three questions boards and senior management should be asking:

- 1 Do we maintain a **single inventory of critical third parties**?
- 2 How can our data support **multiple regulatory regimes**?
- 3 Do we have a **consistent source of truth for third-party and incident data**?



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