

Guidelines compliance table

EBA/GL/2017/05 Appendix 1

11 May 2017; Date of application – 01 January 2018 (Updated – 2 October 2020)

Guidelines on ICT Risk Assessment under the Supervisory Review and Evaluation process (SREP)

The following competent authorities* comply or intend to comply with the EBA's Guidelines on ICT Risk Assessment under SREP:

Member State	Competent authority	Complies or intends to comply	Comments
BE	National Bank of Belgium	Yes	As at 05.02.2019, notification date. As of January 2018, the National Bank of Belgium is compliant with the Guidelines on ICT Risk Assessment under the SREP (EBA/GL/2017/OS), in the sense that for every financial institution that undergoes a Supervisory Review and Evaluation Process, an ICT risk assessment is made according to these guidelines. The implementation for Significant Institutions is fully aligned with the ECB-SSM processes/instructions in this regard, and also for Less Significant Institutions the NBB intends to align its implementation to the finalized instructions of the ECB-SSM when available.
BG	Българска народна банка (Bulgarian National Bank)	Yes	As at 20.09.2019, notification date. In accordance with Article 74a of the Law on Credit Institutions banks shall apply the EBA guidelines, recommendations concerning them and for which the BNB has announced it shall comply with in

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				accordance with Article 79a, paragraph 1, item 2 of the same Law. The EBA/GL/2017/05 is part of the legal framework to the BNB Manual for the SREP (adopted by Decision Nr 279/14.11.2018 of the BNB Governing Council); Under the Manual, the supervisory assessment of bank's ICT risk is accomplished in the course of the assessment of the operational risk, as well as in the context of the risk management framework. The SREP Manual is available only in Bulgarian language.
CZ	Czech Republic	Czech National Bank	Yes	As at 03.11.2017, notification date.
DK	Denmark	Finanstilsynet (FSA-DK)	Intends to comply**	By 01.01.2020. 01.01.2018
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	Yes	As at 01.01.2019, notification date.
EE	Estonia	Finantsinspektsioon	Yes	As at 01.11.2017 notification date
IE	Ireland	Central Bank of Ireland	Yes	As at 04.02.2019, notification date.
EL	Greece	Bank of Greece	Intends to comply**	By 31.12.2019. By 01.01.2018.
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	Yes	As at 02.10.2010, notification date. In line with requirements stemming from EBA Guidelines on ICT Risk Assessment under SREP (EBA/GL/2017/05), CNB developed and implemented its own IT risk methodology under SREP. Methodology and CNB's approach were presented at EBA Workshop on IT risk supervision and cloud outsourcing (December 2017). IT risk assessment includes assessment of the institution's governance and strategy on ICT (feeds into the assessment of internal governance and institution-wide controls) and assessment of institutions' ICT risk exposures and controls (contributes to the assessment of Operational risk as a part of risks to capital). Information for the assessments is collected from multiple sources (external IT auditors, internal IT

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				<p>control and IT management functions of credit institutions etc.) and by using various techniques (questionnaires, self-assessments, reports, documents analysis and yearly meetings). A brief overview of the methodology is shown in the next diagram:-</p> <p style="text-align: center;">- IT SREP methodology - Three-phased approach -</p> <p style="text-align: center;">-</p> <p>By using this methodology, in 2018, CNB performed IT risk assessment for SREP I (OSI), SREP II and SREP III categories of credit institutions. IT SREP scores were included into overall SREP scores.</p> <p>As at 28.01.2019, notification date. In line with requirements stemming from EBA Guidelines on ICT Risk Assessment under SREP (EBA/GL/2017/05), CNB developed and implemented its own IT risk methodology under SREP. Methodology and CNB's approach was presented at EBA Workshop on IT risk supervision and cloud outsourcing (December 2017.). IT risk assessment includes assessment of the institution's governance and strategy on ICT (feeds into the assessment of internal governance and institution-wide controls) and assessment of institution's ICT risk exposures and controls (contributes to the assessment of Operational risk as a part of risks to capital). Information for the assessments is collected from multiple sources (external IT auditors, internal IT control and IT management functions of credit institutions etc.) and by using various techniques (questionnaires, self-assessments, reports, documents analysis</p>

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				and yearly meetings). By using this methodology, in 2018, CNB did IT risk assessment for SREP I (OSI), SREP II and SREP III categories of credit institutions. IT SREP scores were included into overall SREP scores.
ES	Spain	Banco de España	Yes	As at 07.02.2019, notification date.
FR	France	Autorité de Contrôle Prudentiel et de Résolution (ACPR)	Yes	As at 21.02.2019, notification date. ACPR has complied through an internal document.
IT	Italy	Banca d'Italia	Yes	As at 03.05.2019, notification date.
CY	Cyprus	Central Bank of Cyprus	Yes	As at 22.04.2019, notification date.
LV	Latvia	Financial and Capital Market Commission	Yes	As at 01.02.2019, notification date. EBA Guidelines are directly applicable by the FCMC during the SREP Assessment process.
LT	Lithuania	Bank of Lithuania	Yes	As at 04.02.2019, notification date. Compliance with GL approved by the Supervision Services Decision no 241-33.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Yes	As at 05.02.2019, notification date.
HU	Hungary	The Central Bank of Hungary	Yes	As at 22.02.2019, notification date. Implementing document: ICAAP-ILAAP-BMA Methodological Handbook of the MNB (https://www.mnb.hu/felugvelet/szabalyozas/felugveleti-szabalyozas-eszkozok/modszertani-kezikonyvek/icaap-ilaap-bma-felugveleti-felulvizsgalatok).
MT	Malta	Malta Financial Services Authority	Yes	As at 04.02.2019, notification date.
NL	Netherlands	De Nederlandsche Bank	Yes	As at 10.11.2017, notification date.
AT	Austria	Austrian Financial Market Authority	Yes	As at 07.11.2017, notification date
PL	Poland	Komisja Nadzoru Finansowego	Yes	As at 15.02.2019, notification date.
PT	Portugal	Banco de Portugal	Yes	As at 05.02.2019, notification date.

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RO	Romania	National Bank of Romania	Yes	As at 10.11.2017, notification date.
SI	Slovenia	Bank of Slovenia	Yes	As at 01.01.2018, notification date. https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2017-01-3103?so=2017-01-3103
SK	Slovakia	Národná Banka Slovenska	No	Does not comply and does not intend to comply: The competent authority does not comply and does not intend to comply with the Guidelines and recommendations for the following reasons: Current practices of the National Bank of Slovakia as competent authority with respect to the content of the draft guidelines are partially and mostly implemented. Despite of this fact, organizational arrangements, personnel resources and expertise level do not facilitate to fully comply with the Guidelines. National Bank of Slovakia will continue with gradual implementation of relevant components of Guidelines focusing on items of risk taxonomy with potential high severity impact which the supervised institutions are or may be exposed to.
FI	Finland	Finanssivalvonta (FIN-FSA)	Yes	As at 15.02.2018, notification date.
SE	Sweden	Finansinspektionen	Yes	As at 30.01.2019, notification date.
UK	United Kingdom	PRA	Yes	As at 05.03.2018, notification date.
		Financial Conduct Authority	Yes	As at 09.02.2019, notification date.

EU Institutions – Agencies

ECB	ECB	ECB	Yes	As at 05.02.2019, notification date.
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EEA – EFTA State

IS	Iceland	Financial Supervisory Authority, Iceland	Yes	As at 10.11.2017, notification date
LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	Yes	As at 10.11.2017, notification date

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NO	Norway	The Financial Supervisory Authority of Norway	Yes	As at 04.02.2019, notification date.
European Territories under Article 355(3) TFEU				
UK	United Kingdom	Gibraltar Financial Services Commission	Yes	As at 04.02.2019, notification date.

*The EEA States other than the Member States of the European Union are not currently required to notify their compliance with the EBA's Guidelines. This table is based on information provided from those EEA States on a voluntary basis.

** Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered "non-compliant" unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

Notes

Article 16(3) of the EBA's Regulations requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The EBA endeavour to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the EBA cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from the EBA's website www.eba.europa.eu.