DORA Implementation Checklist

Company:	Date:

	Topic	Activities	Reference Status	
1. 0	General			
	1.1. Requirements and Guidelines	Collect and study all DORA requirements, technical standards, guidelines and recommendations from ESAs and local authorities. If necessary, attend additional training courses.	DORA, Technical Standards, Guidelines and Recommendations	
	1.2. Scope of DORA	Determine the boundaries and applicability of DORA to establish its scope. Check references to Article 16, 'Simplified ICT Risk Management Framework'.	DORA: Art.2, 16.1	
	1.3. Principle of proportionality	Identify internal and external factors affecting digital operational resilience, including company size and overall risk profile, as well as the nature, scope and complexity of services, activities and operations. [Context]	DORA: art.4	
	1.4. Meeting introductory	Organise an introductory meeting with the management body. Ensure that the management body is fully supportive a nd committed, particularly with regard to the allocation of resources necessary for the implementation of DORA.	DORA: Art. 5.2a, 5.2g, 5.4	
	1.5. Group and Implementatio n Plan	Assemble an implementation team. Create and approve a DORA implementation plan and a project charter, if necessary. Conduct a kick-off meeting.	DORA: art.5.2g	
	1.6. Document Management	Define the necessary requirements for the management of DORA documentation and prepare the appropriate templates. In addition, create a register for DORA-related documents and records.	DORA: Art. 6.1, 6.5, 8.1, 8.5	
2. 0	2. Governance and Internal Control Framework (CGCI)			
	2.1. Gap analysis (governance)	Conduct a gap analysis to understand the current state of the QGCI.	Internal Governance Guidelines	
	2.2. Management Body	Describe (review) information on the structure, organisation, members and responsibilities of the management body.	DORA: Art.5.2a,c GIG: 230 (d), (e); 21	
	2.3. Committees	Establish a risk committee, an audit committee and other necessary committees (e.g. Cybersecurity, Business Continuity, Privacy). Collect agendas of committee meetings and their main outcomes and conclusions.		
	2.4. Code of conduct	Document (revision) Corporate Values and Code of Conduct.		