



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

ECB Guide on outsourcing cloud services to cloud service providers

Institution/Company

ISACA

Contact person**Mr/Ms**

MR

First name

Sergio

Surname

Tringali

Email address

stringali@isaca.org

Telephone number

32465973113

☐ Please tick here if you do not wish your personal data to be published.

General comments

ISACA welcomes the opportunity to respond to the consultation on the ECB guidance on cloud outsourcing. We are supportive of the ECB's aim to raise the operational resilience baseline for financial entities, including as regards the outsourcing of ICT services. ISACA has previously worked to provide guidance for firms that would need to implement DORA, at the time of its original publication.

Our targeted response particularly concerns chapter 2.5 on oversight monitoring and internal audits and in particular the expectations for independent auditors.

Template for comments

ECB Guide on outsourcing cloud services to cloud service providers

Please enter all your feedback in this list.
When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 15.07.2024

ID	Chapter	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	2.5 Oversight, monitoring and internal audits 2.5.1 Need for independent expert monitoring of CSPs	2.5	15	Clarification	Art.28.5 of the RTS on ICT risk management framework under DORA specifies that auditors should possess sufficient knowledge, skills and expertise in ICT risk, as well as appropriate independence. Recognised professional certifications are a convenient and effective tool to ensure the quality of perspective testers, as recongised in the TIBER-EU procurement guidelines Accordingly, we suggest a similar specification is made in the ECB guidance as well. A line could be added specifying that auditors should possess the appropriate skills to perform their task in accordance with this guidance and be certified in line with o recognised market standards for the performance of their activities"	Alignment of supervisory expectations with DORA. Standards for auditors should not be lower in ECB guidance.	Tringali, Sergio	Publish