Box 3.1

SUPERVISION OF CRITICAL ICT THIRD-PARTY PROVIDERS

The European Digital Operational Resilience Act (DORA) establishes a novel supervisory framework for information and communication technology (ICT) providers that are critical to the European financial sector. To identify such providers, in April and May 2025, registers of information on contractual arrangements with thirdparty ICT providers were collected from European entities subject to DORA.

This was used to identify and designate critical providers, pursuant to the criteria laid down in DORA. On 18 November 2025, after the submissions period had closed, the European Supervisory Authorities (ESAs) published the final list of 19 designated critical ICT third-party providers. The list is to be reviewed and updated annually.

At the same time, progress was made in 2025 towards establishing supervisory methodologies and procedures, as well as governance mechanisms, that will govern collaboration between the European and national authorities involved in the supervision of critical ICT providers. This supervisory framework is notable for its scale and complexity, with more than 50 authorities from 27 countries working together under the leadership of the ESAs, requiring substantial commitment, effort and collaboration.

The lead overseer will always be one of the supervisory authorities, while the joint examination teams will comprise experts from the competent authorities, with the European Central Bank playing a prominent role. The Banco de España has contributed two full-time supervisors specialising in ICT risk.

The supervision of critical ICT providers aims to strengthen the sector's digital resilience, an objective that requires the involvement of all stakeholders. Other economic sectors that use these same providers may also benefit indirectly.