



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Consultation Paper 138

Cross-Industry Guidance on Outsourcing

February 2021

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Note:

This Consultation Paper should be read in conjunction with the [Draft Cross-Industry Guidance on Outsourcing – February 2021](#)

1. Introduction

- 1.1 The Central Bank of Ireland ('the Central Bank') is publishing this paper to consult on the Central Bank's proposed Cross-Industry Guidance on Outsourcing ('the Guidance'). It follows on from the publication of the paper 'Outsourcing – Findings and Issues for Discussion'¹ in November 2018 and the hosting of an industry Outsourcing Conference in April 2019.
- 1.2 The Central Bank's Strategic Plan 2019–2021² sets out its Mission, Vision and Mandate. The Mission of the Central Bank is to serve the public interest by safeguarding monetary and financial stability and by working to ensure that the financial system operates in the best interests of consumers and the wider economy. In discharging its functions and exercising its powers, the Central Bank's mandate incorporates a number of statutory objectives. The proposed Guidance is issued in accordance with a number of these objectives, particularly:
- Contributing to the stability of the financial system;
 - The proper and effective regulation of financial service providers and markets, while ensuring that the best interests of consumers of financial services are protected; and
 - The resolution of financial difficulties in credit institutions, certain investment firms and credit unions.
- 1.3 The Central Bank has also prioritised five strategic themes, which have been identified as being critical to the successful delivery of its mandate. The themes of:
- 'Strengthening Resilience' so that the financial system is better able to withstand external shocks and future crises; and
 - 'Strengthening Consumer Protection' so that the best interests of consumers are protected and confidence and trust in the financial system is enhanced through effective regulation of firms and markets, are of particular relevance to the proposal to publish this Guidance.
- 1.4 The Central Bank views the management of outsourcing risk as key from both a Prudential and Conduct perspective. Boards and senior management must be cognisant of the fact that when entering into outsourcing arrangements they are creating a dependency on a

¹ <https://www.centralbank.ie/docs/default-source/publications/discussion-papers/discussion-paper-8/discussion-paper-8---outsourcing-findings-and-issues-for-discussion.pdf?sfvrsn=12>

² For further information, please refer to the Central Bank's Strategic Plan 2019 – 2021, which can be found here: <https://www.centralbank.ie/docs/default-source/publications/corporate-reports/strategic-plan/central-bank-of-ireland-strategic-plan-2019---2021.pdf?sfvrsn=5>

third party, or a chain of such parties. This has the potential to influence the operational resilience of their firm, the quality and service of products delivered to consumers and the operation of the market.

1.5 The Central Bank is proposing to introduce the Guidance, (as set out in Schedule 1) of this Consultation Paper, in order to support and complement existing sectoral legislation, regulations and guidelines on outsourcing.

1.6 Details of the relevant sectoral legislation, regulations and guidance (as at the date of publication of this Consultation Paper), referred to in 1.5 above, are included in Appendix 1 of the Guidance.

2. Outsourcing Policy Development

2.1 The Central Bank has undertaken a significant programme of work in relation to outsourcing and the management by regulated firms of risks presented by outsourcing arrangements. This work has been undertaken in light of the increased prevalence of outsourcing across the financial services landscape, growing international focus on outsourcing and increasing concerns in relation to outsourcing practices and risks. There are also clearly evident links between the effective management of outsourcing risk and the Central Bank’s mandate and strategic priorities, particularly in ensuring the operational resilience of the financial system and the protection of consumers. This programme of work has included:

- a “Cross Sector Survey of Regulated Firms’ Outsourcing Activity”, which issued to 185 regulated firms in 2017;
- the publication of the discussion paper ‘Outsourcing – Findings and Issues for Discussion’³ in November 2018; and
- the hosting of an industry Outsourcing Conference in April 2019; and
- ongoing outsourcing related supervisory engagements, including risk assessments, inspections, thematic reviews and the necessary pursuit of enforcement actions.

2.2 During the conduct of this programme of work, the European Banking Authority (‘the EBA’) updated the 2006 guidelines on outsourcing that were issued by the Committee of European Banking Supervisors (CEBS). The updated Guidelines on Outsourcing,

³ <https://www.centralbank.ie/docs/default-source/publications/discussion-papers/discussion-paper-8/discussion-paper-8---outsourcing-findings-and-issues-for-discussion.pdf?sfvrsn=12>

EBA/GL/2019/02, were published in February 2019 and came into force in September 2019. These Guidelines also incorporated the EBA’s 2017 recommendations on outsourcing to cloud service providers (CSPs). The aim of the EBA Guidelines is to “establish a more harmonised framework for all financial institutions that are within the scope of the EBA’s mandate, namely credit institutions and investment firms subject to the Capital Requirements Directive (CRD), as well as payment and electronic money institutions”⁴.

2.3 2019 and 2020 also saw the publication of the following:

- EBA Guidelines on ICT and security risk management (EBA ICT Guidelines);
- European Insurance and Occupational Pensions Authority (EIOPA) Guidelines on Outsourcing to Cloud Service Providers (EIOPA-BoS-20-002);
- EIOPA Guidelines on ICT Security and Governance BoS-20/600;
- International Organization of Securities Commissions (IOSCO) Principles on Outsourcing – Consultation Report (May 2020);
- European Securities and Markets Authority ESMA 50-157-2403 Guidelines on Outsourcing to Cloud Service Providers (Final - December 2020); and
- Financial Stability Board (FSB) Discussion Paper - Regulatory and Supervisory Issues Relating to Outsourcing and Third-Party Relationships.

There will continue to be further development of the regulatory landscape relevant to outsourcing risk, such as, the forthcoming Digital Operational Resilience Act (DORA) and the review of the AIFMD Regulations, which are currently in consultations. These will also be followed by the Investment Firms Directive and Regulations (IFD/IFR) in 2021/22.

2.4 The Central Bank recognises the increasing reliance of many regulated firms on outsourced service providers (OSPs). This includes the use of both intragroup entities and third party OSPs, both regulated and unregulated, for the provision of activities and services considered central to the successful delivery of regulated firms’ strategic objectives. Key to the fulfilment of the Central Bank’s mandate is the use of risk-based supervision to challenge the effectiveness of the governance arrangements and risk management practices implemented by regulated firms including those in respect of outsourcing risk. The proposed Guidance sets out the Central Bank’s expectations regarding the governance and management of outsourcing risk.

2.5 The discussion paper ‘Outsourcing – Findings and issues for Discussion’ referenced in 2.1 above, sets out the Central Bank’s findings from the ‘Cross Sector Survey of Regulated

⁴ <https://eba.europa.eu/sites/default/documents/files/documents/10180/2551996/38c80601-f5d7-4855-8ba3-702423665479/EBA%20revised%20Guidelines%20on%20outsourcing%20arrangements.pdf>

Firms' Outsourcing Activity' and its ongoing supervisory work and areas of concern identified in this regard. While a number of good practices were observed, significant deficiencies were identified in board awareness and understanding of the extent of the reliance within their firms on OSPs. Furthermore, the paper highlighted major weaknesses with regard to the related governance and risk management controls and processes in place across all financial sectors. Ongoing supervisory engagement on outsourcing indicates that this has not changed substantially. Ultimately, boards and senior management of regulated firms⁵ retain responsibility for the functions and services outsourced and are responsible for the management of risks associated with outsourcing.

- 2.6 The discussion paper set out the Central Bank's minimum supervisory expectations in relation to the governance, risk management and business continuity measures that should be applied by regulated firms in the management of outsourcing risk. The discussion paper also sought to open up discussion on evolving outsourcing risks, to further inform the Central Bank's consideration of policy development in this area.
- 2.7 Responses to the discussion paper were invited from regulated firms and other industry stakeholders and were published on the Central Bank's website⁶.
- 2.8 Given the findings detailed in the discussion paper, the evolving regulatory environment and our continued supervisory focus on outsourcing, the Central Bank is of the opinion that it is appropriate to publish 'Cross-Industry Guidance on Outsourcing' (the Guidance), which is the subject of this consultation. It does so in order to clearly articulate the Central Bank's expectations more broadly with regard to the management of outsourcing risk.

3. Background

- 3.1 The nature of the financial services landscape is continually evolving. This change is influenced by many factors including customer/client preferences, regulatory developments, the increased pace of technological innovation in the delivery of services, and changes in business models driven by cost, profitability and the need for increased flexibility and agility. Outsourcing is at the heart of much of this change and is increasingly being adopted as a key strategic tool to enable financial service providers regulated by the Central Bank ('regulated firms') to respond to and manage these changes.

⁵ It is important to note that the collective decisions of the board and senior management draw on contributions from a range of individuals with distinct responsibilities.

⁶ <https://www.centralbank.ie/publication/discussion-papers/discussion-paper-8---outsourcing---findings-and-issues-for-discussion>

The Central Bank recognises the increasing reliance of many regulated firms on outsourced service providers (OSPs). This includes the use of both intragroup entities and third party OSPs, both regulated and unregulated, for the provision of activities and services considered central to the successful delivery of regulated firms' strategic objectives. Furthermore, given the continually changing landscape for the provision of financial services and the adaptation of regulated firms in responding to this change, the Central Bank anticipates that new structures and service delivery models will evolve into the future. The Central Bank is already seeing some of these transformative capabilities emerging, through service delivery models such as strategic partnering, cross-industry shared service centres and extensive sub-outsourcing.

While the Central Bank acknowledges that outsourcing presents significant and wide ranging benefits to regulated firms, it also poses risks if not effectively managed. Consequently, when developing new models to deliver critical and important services, regulated firms must have regard to all outsourcing arrangements in place and should apply the proposed Guidance to these arrangements.

- 3.2 The Central Bank also recognises the increasing role of technology reflected in the recent rapid growth in the number of fintech (financial technology) and regtech (regulatory technology) firms, and the use of cloud service providers (CSPs) by regulated firms. The increase in the outsourcing of core IT activities is a key area of regulatory and supervisory focus for the Central Bank given the additional risks generated if not appropriately managed. These risks, in turn, potentially threaten the resilience of regulated firms, and consequently the domestic Irish financial system and the wider EU market in which such firms are operating. Most importantly there is a need for regulated firms to understand and appropriately manage the specific risks relating to the outsourcing of their "critical or important" services⁷ to Cloud Service Providers (CSPs). The proposed Guidance sets out specific expectations in the management of risks associated with outsourcing related to Information and Communications Technology (ICT), including those arising when outsourcing to the cloud, in addition to the broader measures that should be adopted for all critical or important outsourcing arrangements.

⁷ "Functions that are necessary to perform core business lines or critical business functions should be considered as critical or important, unless the institution's assessment establishes that a failure to provide the outsourced Function or the inappropriate provision of the outsourced Function would not have an adverse impact on the operational continuity of the core business line or critical business function".

The specific criteria to be considered by regulated firms, as applicable to them, under each of the relevant pieces of legislation, regulations or guidelines (as of the date of publication of the Guidance), are, for ease of reference, contained at Appendix 2 to the Guidance.

- 3.3 The storage and management of business sensitive and/or customer confidential data by third parties, including CSPs, raises potential data security risks that must be addressed and appropriately managed to prevent vulnerabilities arising. It is imperative that regulated firms have knowledge of where their data is stored and how it is secured, to ensure appropriate risk management processes and controls, including data protection measures are in place.
- 3.4 Oversight of outsourcing can be complicated by the use of sub-outsourcing (also referred to as chain outsourcing), whereby the OSP transfers the performance of an outsourced function or service to another provider. Outsourcing chains can become long and complex and so specific measures must be put in place to ensure that regulated firms are aware of and have appropriate governance and risk management arrangements in place in respect of sub-outsourcing.
- 3.5 The Central Bank recognises that offshoring is a significant feature of outsourcing by regulated firms with the Industry Survey of 2017 identifying that outsourcing arrangements are in place to over 80 countries, many of which are outside the EU/EEA. Visibility and supervisibility risk is one of the key concerns associated with offshoring, arising from the physical distance of the regulated firm from where the activity or service is being provided. This can challenge both a regulated firm's and the competent authority's ability to ensure effective oversight and supervision.

The experiences of offshoring for regulated firms during Covid-19 have, in some cases, revealed weaknesses from an operational resilience perspective, which indicate a need for firms to strengthen some fundamental aspects of their outsourcing strategies, including contractual arrangements, monitoring of operations and recovery and exit strategies. The Guidance provides comprehensive coverage on each of these critical topics.

- 3.6 The increasing use of outsourcing arrangements, particularly in respect of cloud outsourcing, is giving rise to elevated levels of concentration risk. Concentration risk can arise at an individual firm level, whereby a firm has a dependency on a single or small number of firms for the provision of critical or important outsourced functions. It can also arise at a sectoral or cross-sectoral level where these dependencies are shared by multiple firms in a sector or across sectors. Concentration risk is of particular concern where it is determined that there are a limited number of providers of certain services, for example in the case of CSPs or other specialist service providers, that may be difficult to substitute. Such concentrations can also give rise to broader systemic concentration risk concerns if

not appropriately managed. The Central Bank's research⁸ suggests that there is a significant degree of concentration risk in respect of the provision of particular outsourced critical or important services in the Irish financial services sector and that in many cases, regulated firms may not be aware of their exposure to concentration risk in their outsourcing arrangements. Consequently, the Central Bank in its proposed Guidance has provided clarity regarding concentration risk and its expectations of regulated firms for the identification and management of this risk. Such provisions include the maintenance and submission of outsourcing registers to the Central Bank.

4. Purpose & Scope of the Proposed Guidance

- 4.1 The Central Bank's programme of supervision seeks to confirm that regulated firms have effective governance, risk management and business continuity processes in place in relation to outsourcing, to mitigate potential risks of financial instability and consumer detriment. The proposed Guidance, a link to which is set out herein, at Schedule 1, is designed to assist regulated firms in developing their outsourcing risk management frameworks so as to effectively, identify, monitor and manage their outsourcing risks.
- 4.2 The Guidance also reminds regulated firms of their statutory obligations with regard to compliance with existing (as at the date of publication of this Consultation Paper) and future legislation, regulations and guidelines relevant to their sector, in respect of the management of outsourcing risk – see Appendix 1 of the draft Guidance.
- 4.3 Furthermore, the purpose of the Guidance is:
- To communicate the Central Bank's expectations with respect to the management of outsourcing risk to the boards and senior management of regulated firms;
 - To remind boards and senior management of regulated firms of their responsibilities, including statutory obligation, when considering and utilising outsourcing, in any form, as part of their business model; and
 - To promote the adoption of standards and good practice such that the boards and senior management of regulated firms take appropriate action to ensure that their outsourcing frameworks are well designed, operating effectively and are sufficiently robust to oversee and manage the associated risks.
- 4.4 The Guidance also reaffirms the Central Bank's adoption of the EBA 'Guidelines on Outsourcing Arrangements' and the EIOPA and ESMA Guidelines for outsourcing to cloud service providers, for regulated firms that are within the scope of those Guidelines. The Guidance confirms the Central Bank's expectation that such firms make every effort to comply with those guidelines.

⁸ The Industry Survey 2017

- 4.5 While the EBA, EIOPA and ESMA Guidelines (ESAs Guidelines) apply to certain sectors only, the requirements set out therein, and in other draft Guidelines currently the subject of consultation (see 3.3 above), align with the Central Bank's own supervisory expectations in relation to the governance and management of outsourcing risk. The Central Bank's Cross-Industry Guidance on Outsourcing ('the Guidance') as set out in Schedule 1 (See [link](#)) is therefore aligned with such guidelines but proposed for application, in a proportionate manner, to all regulated firms. However, the Central Bank acknowledges that the manner in which it may be adopted may differ based on the nature, scale and complexity of the regulated firm's business and the extent to which they rely on outsourcing of critical or important functions as part of their business model.
- 4.6 The Guidance sets out the Central Bank's expectations where certain provisions of the ESA Guidelines allow for National Competent Authority discretions e.g. notification of outsourcing arrangements⁹ and the maintenance and submission of outsourcing registers, (see Part B Sections 10.1. and 10.2 of the Guidance).
- 4.7 The Guidance also clarifies the Central Bank's position in relation to key issues raised by respondents to the Central Bank's discussion paper, most notably:
- Application and Proportionality – see Part A - Section 4 of the Guidance, which sets out the Central Bank's view that the Guidance generally applies to all regulated firms, albeit the manner in which it may be adopted may differ based on the nature, scale and complexity of the regulated firm's business and the extent to which they rely on outsourcing of critical or important functions as part of their business model.
 - Identification of critical or important arrangements – see Part B Section 1 of the Guidance;
 - Applicability to Intragroup Arrangements – see Part B Section 2 of the Guidance;
 - The relevance of the Guidance to delegation arrangements – see Part B Section 3 of the Guidance.
- 4.8 The Guidance does not supersede existing sectoral legislation, regulations and guidance on outsourcing, but rather supports and complements them by setting out aspects of good practice for the effective management of outsourcing risk in all its forms (see Appendix 1 of the draft Guidance for details of applicable sectoral requirements). Where existing relevant sectoral legislation, regulations or guidance is less prescriptive or is silent on

⁹ It should not be inferred from the expectations relating to Notifications that the Central Bank is creating a pre-approval process, where such a pre-approval is not an existing legal requirement. The Guidance does not supersede existing sectoral legislation, regulations and guidance on outsourcing, but rather supports and complements them by setting out aspects of good practice for the effective management of outsourcing risk in all its forms.

certain matters, it is the Central Bank's expectation that regulated firms refer to the supervisory expectations set out in the Cross-Industry Guidance.

- 4.9 The Guidance does not purport to address, in detail, every aspect of firms legal and regulatory obligations as they pertain to outsourcing. It should be read in conjunction with the relevant statutory requirements including legislation, regulations as well as guidance and standards issued by the European Supervisory Authorities (ESAs) and further guidelines/guidance or bulletins issued by the Central Bank in force at the point in time.
- 4.10 The Central Bank, conscious of the continuous evolution of the regulatory framework, may update or amend the Guidance from time to time, as and when the need arises.

5. Format of the Cross Industry Guidance on Outsourcing

5.1 The 'Cross-Industry Guidance on Outsourcing' (the Guidance), which is included at Schedule 1 of this consultation paper, is structured as follows:

- **Part A - Section 1 – Introduction** – sets out the background to the proposed guidance and its purpose and scope. It also sets out the Central Bank's intentions for the adoption of the guidance in a manner that is proportionate to the nature, scale and complexity of a regulated firm's business. Finally, this section sets out the status of the guidance in the context of existing sectoral legislation, regulations and guidelines.
- **Part B Section 1 – Assessment of criticality or importance** – in keeping with the principle of proportionality, it is intended that the proposed guidance be predominantly applied in respect of outsourcing of activities, services or functions that are deemed to be critical or important to a firm's business (albeit some aspects are identified as being applicable to all outsourcing arrangements). This section sets out the factors that regulated firms should consider when determining if an outsourced function should be deemed critical or important.
- **Part B Section 2 – Intragroup Arrangements** – clarifies the Central Bank's view that the guidance applies equally to intragroup outsourcing arrangements as it does to arrangements with third party OSPs. It is acknowledged that the manner in which the guidance is applied may however differ for intragroup arrangements.
- **Part B Section 3 – Outsourcing and Delegation** – clarifies the Central Bank's view that outsourcing and delegation are not different concepts. While the specificities of requirements for delegation arrangements are addressed in the relevant sectoral legislation, regulations and guidance, it is emphasized that the Cross-Industry Guidance on Outsourcing herein, is directly relevant to these regulated firms. The

Guidance highlights certain aspects of outsourcing risk management that should be of particular interest to these firms in strengthening their outsourcing/delegation frameworks¹⁰.

- **Part B Section 4 – Governance** – this section sets out the Central Bank’s expectations around the appropriate and effective governance of outsourcing. It sets out details of the responsibilities of boards and senior management in this regard. It also highlights the Central Bank’s expectation that regulated firms consider their strategy and risk appetite in relation to outsourcing and details the elements, which should be incorporated in a regulated firm’s outsourcing policy.
- **Part B Section 5 – Outsourcing Risk Assessment and Management** – highlights the importance of conducting and maintaining comprehensive outsourcing risks assessments and details the issues which should be considered when assessing and designing controls to manage and/or mitigate a number of key outsourcing risks.
- **Part B Section 6 – Due Diligence** – sets out the Central Bank’s expectation that regulated firms undertake appropriate due diligence in respect of their OSPs prior to entering into an outsourcing arrangement and at appropriate intervals during the lifecycle of the arrangement.
- **Part B Section 7 – Contractual Arrangements & Service Level Agreements (SLAs)** – sets out the key contractual provisions that should be incorporated into written outsourcing agreements, (which should preferably be legally binding contracts), including provisions regarding access, audit and information rights and the arrangements for exit from and/or termination of the arrangement. It also highlights that such agreements should be supported by SLAs.
- **Part B Section 8 – Ongoing Monitoring** – highlights the importance of regular, comprehensive monitoring of the delivery of the service or function that has been outsourced and the appropriateness of the framework governing and supporting the arrangements.
- **Part B Section 9 – Disaster Recovery and Business Continuity Management** – sets out the Central Bank’s expectations of regulated firms in the establishment and oversight of measures to ensure support for the continuity of outsourced functions. It also sets out the requirement to have in place appropriate strategies to exit outsourcing arrangements should the need arise.
- **Part B Section 10 - Provision of Outsourcing Information to the Central Bank** – which addresses the Central Bank’s expectations with regard to the requirements for

¹⁰ In line with the recommendations contained in the Letter and Report of the Thematic Review of Fund Management Companies’ Governance, Management and Effectiveness.

regulated firms to inform, by way of notification, the Central Bank of any planned critical or important outsourcing arrangement or changes to existing critical or important outsourcing arrangements. Such notifications should be made in a timely manner. It should not be inferred from the expectations relating to Notifications that the Central Bank is creating a pre-approval process, where such a pre-approval is not an existing legal requirement. The Guidance does not supersede existing sectoral legislation, regulations and guidance on outsourcing, but rather supports and complements them by setting out aspects of good practice for the effective management of outsourcing risk in all its forms. This section also sets out the requirements for regulated firms to establish and maintain a register (database) of all outsourcing arrangements and the information (data elements) that such registers should contain. It also sets out the Central Bank's proposals to establish an online regulatory return for submission by regulated firms of their outsourcing registers. It is proposed that submission of registers will be required from regulated firms on a cyclical basis commencing in January 2022.

6. Implementation

- 6.1 The Central Bank proposes to publish the Guidance in 2021 following the conclusion of the consultation period and consideration of submissions received from respondents.
- 6.2 The Guidance is supplemental to existing sectoral legislation, regulations and guidance with which regulated firms are already expected to comply. It is the Central Bank's expectation that the boards and senior management of regulated firms review the Guidance and adopt appropriate measures to strengthen and improve their outsourcing frameworks and their effective management of outsourcing risk in line with this Guidance. Regulated firms must be able to demonstrate that they have considered the supervisory expectations set out in the Guidance in this regard.
- 6.3 With regard to the Central Bank's requirements in relation to Notifications and the submission of Outsourcing Registers as detailed in Part B - Section 10.1 and 10.2 of the Guidance, it is proposed that:
 - for regulated firms who fall within scope of the EBA, EIOPA and ESMA Guidelines referenced above, the Central Bank timelines for implementation of these aspects of the Guidance will align with the timelines mandated by the EBA, EIOPA and ESMA respectively; and

- for all other regulated firms, the timeline for implementation of these requirements will be in accordance with existing sectoral regulation or guidelines or as will be notified by way of an industry letter.

7. Consultation Process

- 7.1 The Central Bank invites general feedback on the Guidance from interested stakeholders, including Firms, representative bodies, industry consultancies and service providers. In addition, the Central Bank requests that respondents consider the specific questions under Section 8 of this Consultation Paper.
- 7.2 If making a submission in response to this Consultation Paper, respondents are requested to make the submission electronically as a word document or a pdf document by e-mail.
- 7.3 When submitting a response the Central Bank would ask that respondents include the following subject heading in their email '**Consultation Paper 138**' and address the response to outsourcingfeedback@centralbank.ie. We will send an acknowledgement to all responses received by email. If you do not receive an acknowledgement, please contact us at SRD on +353 1 224 6447 or +353 1 224 4069.
- 7.4 The consultation will remain open for 5 months from 25 February until 26 July 2021.
- 7.5 It is the policy of the Central Bank to publish all responses to its consultations. The Central Bank will make all submissions available on its website. Commercially confidential information should not be included in consultation responses. Information deemed potentially libellous or defamatory will not be published. The Central Bank will accept no liability in respect of any information provided, which is subsequently released, or in respect of any consequential damage suffered as a result.

Supervisory Risk Division

Central Bank of Ireland

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8. Consultation Questions

- 8.1 The Central Bank asks respondents to consider the following questions in addition to any general comments or suggested changes to the Guidance. Respondents should note that the Guidance is not intended to be sector specific.

Questions

1. Are there any aspects of the Guidance that are unclear? If so, please advise what these are and provide suggestions on the additional clarity required.
2. What, if any, are the other areas/topics that should be covered in the Guidance (specify sections) or in future versions of the Guidance?
3. What, if any, are the significant issues /or concerns or unintended consequences that might arise due to the provisions of the Guidance?
4. The Central Bank has considered existing sector specific legislation and guidance as they pertain to outsourcing and is of the view that this Guidance serves to provide additional clarity on the Central Bank's expectations and best practice when firms utilise outsourcing. Are there any particular aspects of the Guidance that appear to be at odds with existing sectoral requirements and could give rise to confusion/ misinterpretation? If so please provide details on any aspects which you believe may cause confusion and suggest how best to address such issues.

Schedule 1: Draft Cross-Industry Guidance on Outsourcing

Please note that Schedule 1 of this Consultation Paper 138 - the [Draft Cross-Industry Guidance on Outsourcing](#) has been published as a separate document



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