

Why and to what extent should the industry be prepared?

- Ensure business continuity
- Retain trust in the financial sector
- Support financial stability and financial intermediation
- Enable society's ability to function
- How to find a common ambition level?



Why preparedness became a key topic in Finland

- Structural changes in the financial sector
 - Shift from local services and IT systems to international
- Technological development
 - Outsourcing of supply chains, concertation, and location of IT systems
- Geopolitical situation
 - Need for a new preparedness regulation inevitable in spring 2022
- → Preparedness must evolve with the technological development and the changing threat landscape

Finland as an island



- Target2
- Tips
- Visa
- MasterCard
- Commercial banks' operations
- •



Securing daily payments in Finland

- Authorities established backup arrangements in summer 2022 to secure national retail payments.
- Preparations included legislative changes and building of technical capabilities.
 - Legislative changes (666/2022) in force as of 11.7.2022.
 - Technical capabilities were introduced soon after the legislation
- Technical solution consists of two parts
 - The backup account system maintained by the resolution authority secures customers' access to accounts, the functioning of the debit cards and cash withdrawals.
 - Payments to/from the backup account system transmitted via the Bank of Finland contingency system.



International preparedness

- Shared understanding of the importance to protect against cyber risks, but little international tools to respond to international cyber incidents
- National backup solutions can be used to restore national functions
- International functions need international solutions

Further questions on preparedness

- Other critical services to be regulated from this perspective?
- Preparedness for existing services vs stand-by solutions for extreme scenarios?
- The usefulness of cloud services as solutions for preparedness?
- International vs. national preparedness. Should we aim at harmonizing regulation in the Nordics?
- The role of CBDCs in preparedness?

