

To: Solvency II WG
From: Prudential Team
cc:
Date: 25-07-2025
Reference: ECO-SLV-25-291

Subject: EIOPA follow-up to peer review on outsourcing

Summary

On 25 July, EIOPA published the [follow-up report](#) to its [2022 Peer Review on Outsourcing](#) under the Solvency II framework.

The 202-page report evaluates the previous 77 recommended actions for each individual NCAs. Overall:

- **51** (66%) assessed as '**fulfilled**'
- **22** (19%) assessed as '**partially fulfilled**' (i.e. work is in progress)
- **4** (5%) have not been fulfilled (i.e., work has not started yet)

EIOPA acknowledge the high number of fulfilled actions reflects the sector-wide recognition of outsourcing as a critical supervisory issue and the concerted efforts taken to align supervisory frameworks with EIOPA's expectations.

Overall areas where EIOPA observed improvement:

- Refined regulatory instruments
- Published detailed guidance and improved internal procedures.
- Enhanced documentation and risk assessment requirements.
- Structured notification processes.
- More advanced information management systems internal registers.

Overall areas that **warrant further attention**, as stated by EIOPA:

- Off-site supervision
- Full operationalisation of supervisory tools
- Consistent embedding of internal procedures.

Background information

- The follow-up review was conducted by the Peer Review Committee (PRC).
- The reference period for this follow-up review spans from July 2022 to September 2024.
- The original peer review was based on supervisory practices in place during the period from January 2016 to December 2020.
- Section 3 highlights progress identified and compares actions from named NCAs.
- Section 4 details progress reports for individual NCAs.
- Section 5 outlines best practices, naming NCAs as examples, in the areas of communication to the market, critical functions criteria, notification structure and thematic reviews.
- Annex III summarises the assessment of the 77 recommended actions, grouped into 12 areas.