



# Operational Resilience 2026 Emerging Risks

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THE FUTURE

As operational resilience expectations continue to tighten across the UK and EU, firms are entering a new era where the challenge is no longer about implementation, but proving end-to-end resilience on a continuous basis. Regulators are increasingly focused on whether organisations can withstand severe but plausible disruptions, remain within impact tolerances, and demonstrate the mature governance required for sustainable compliance. Recent regulatory commentary reinforces that the industry is shifting from initial policy adoption into long-term supervisory scrutiny, with greater emphasis on testing, evidencing and embedding resilience practices.

## 1) Regulatory sustainability and evidencing on-going compliance

With the FCA and PRA transitioning out of the implementation window, firms must now prove that operational resilience is fully embedded. This means delivering more advanced scenario testing capable of challenging the limits of business service recovery. Scenario testing helps confirm whether an organisation can truly remain within its impact tolerances under stress, a requirement highlighted across PRA, FCA and DORA frameworks.

Attention should be focused here as supervisory enforcement will intensify. Without sustainable operating models and evidence frameworks, firms risk failing regulatory reviews and facing costly remediation. These shifts matter to Chief Risk Officers, Heads of Resilience and governance functions who must articulate, evidence and defend resilience posture to both regulators and boards.

## 2) Digital operational resilience and technology resilience uplift

Digital disruption is a material operational risk, with regulators raising expectations on cloud resilience, IT service continuity, and incident response maturity. Operational resilience frameworks now explicitly require firms to test ICT resilience and demonstrate that important business services can remain within tolerance during severe but plausible technology failures, as set out in [FCA SYSC 15A](#) and [PRA SS1/21](#).

The UK's [Critical Third Parties regime](#) (FSMA 2000 ss.312L-312W, as amended by FSMA 2023; PS16/24) further extends direct regulatory oversight to systemic technology providers, including cloud and digital infrastructure, with final rules effective from January 2025.

Supervisory focus is intensifying on digital resilience, crisis readiness, and governance across systems, data, models, and reporting. CIOs, CTROs, and technology risk leaders should expect deeper regulatory scrutiny of technology resilience, cyber response capability, and concentration risk arising from cloud and third party dependencies.

### 3) Third party resilience and concentration risk

As organisations become more dependent on outsourced and cloud-based services, regulators are increasingly focused on third-party resilience, particularly in relation to concentration risks and layered supply-chain dependencies. Regulators have consistently emphasised third-party mapping, scenario testing and the need for clear evidence of supplier readiness and recovery capability.

Many firms struggle with visibility beyond their immediate vendors, making it difficult to assess aggregated risk across multi-layer technology stacks. Clear playbooks, contract clarity and ongoing monitoring are becoming essential components of resilient third-party management.

Regulators expect firms to actively reassess and manage their overall reliance on third parties, with a clear focus on identifying and mitigating concentration risk and vendor lock-in.

This includes exposure arising from common providers, shared fourth-party dependencies, hard-to-substitute services, and geographic clustering of outsourcing / supply chains, [PRA SS2/21](#).

As third-party technology providers, particularly AI firms and cloud service providers, grow in complexity and influence, organisations will be expected to adopt multidisciplinary approaches across technology, procurement and the business to identify dependencies and mitigate disruption risk. This will be a key regulatory focus. Even with strong internal controls, failure of a critical supplier can lead to breaches of impact tolerances, requiring third-party risk, procurement and resilience leaders to strengthen monitoring, testing and scenario planning to meet expectations.

### Call to action

Considering these emerging pressures, reassessing your firm's operational resilience maturity has never been more critical. Across the market, organisations are commissioning targeted assurance reviews to benchmark preparedness and design clear, actionable remediation roadmaps for 2026. If your firm is facing similar challenges, or looking to accelerate its resilience capabilities, get in touch to learn how clients are strengthening their frameworks and operating models, leveraging enhanced monitoring technology improvements and building lasting regulatory confidence.

## About us

Be | Shaping the Future is a leading pan-European financial services management consultancy, operating in 13 countries across Europe.

We are a disrupter to the top-tier consultancy brands, trusted by five out of ten of Europe's leading banks (alongside other leading financial institutions and FinTechs).

We are one of the fastest growing consultancies with dedicated specialist teams in:

- Retail and commercial banking
- Capital markets
- Cards and payments
- Risk, regulatory and compliance
- Finance & CFO advisory
- ESG

At Be UK, we've worked with a range of financial services firms to help design, implement, and enhance operational resilience frameworks.

Our team brings a wealth of experience in operational resilience, data strategy, and regulatory compliance equipping us to support firms wherever they are on their journey, whether it's improving cross-team collaboration, modernising testing methods or unlocking the value of data, we're here to help firms turn insight into action.

Utilising our broad experience from across the banking sector, we ensure our clients take advantage of market disruption to achieve lasting value.

Bringing deep industry expertise and expert consulting capabilities, we support our clients to tackle their biggest opportunities and challenges to deliver fundamental and enduring change to their businesses.

## Contact

For more information on how we can help you on your risk journey, please get in touch.



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