CRBOT

Information on Access for Designated Persons & Discrepancy Notices

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Providing Access to the Register

1. I am a trustee, trust employee, advisor, or agent, how do I give a designated person access to a trust on the Central Register for due diligence purposes?

The trustee, employee, advisor, or agent that registered the trust on CRBOT can generate an Access Number. The Access Number and the Trust Registration Number will allow designated persons with access to CRBOT to undertake due diligence on the trust.

1.1 How do I generate an access number?

The registered trust can be accessed via 'Trust Register Functions' on ROS (Figure 1).

- Click on the relevant trust that you want to provide access to.
- Enter 'Presenter Details'. Note this may be saved from before (see red box in Figure 2).
- Select "Generate New Access Number" (see Figure 3).
- The Access Number has an expiry date of 90 days.
- The expiration date will be displayed when the number is generated. Designated persons should be advised of the expiry date associated with an Access Number.
- Please note only one access number can be issued at a time.

Figure 1: ROS Location

Figure 2: Presenter details

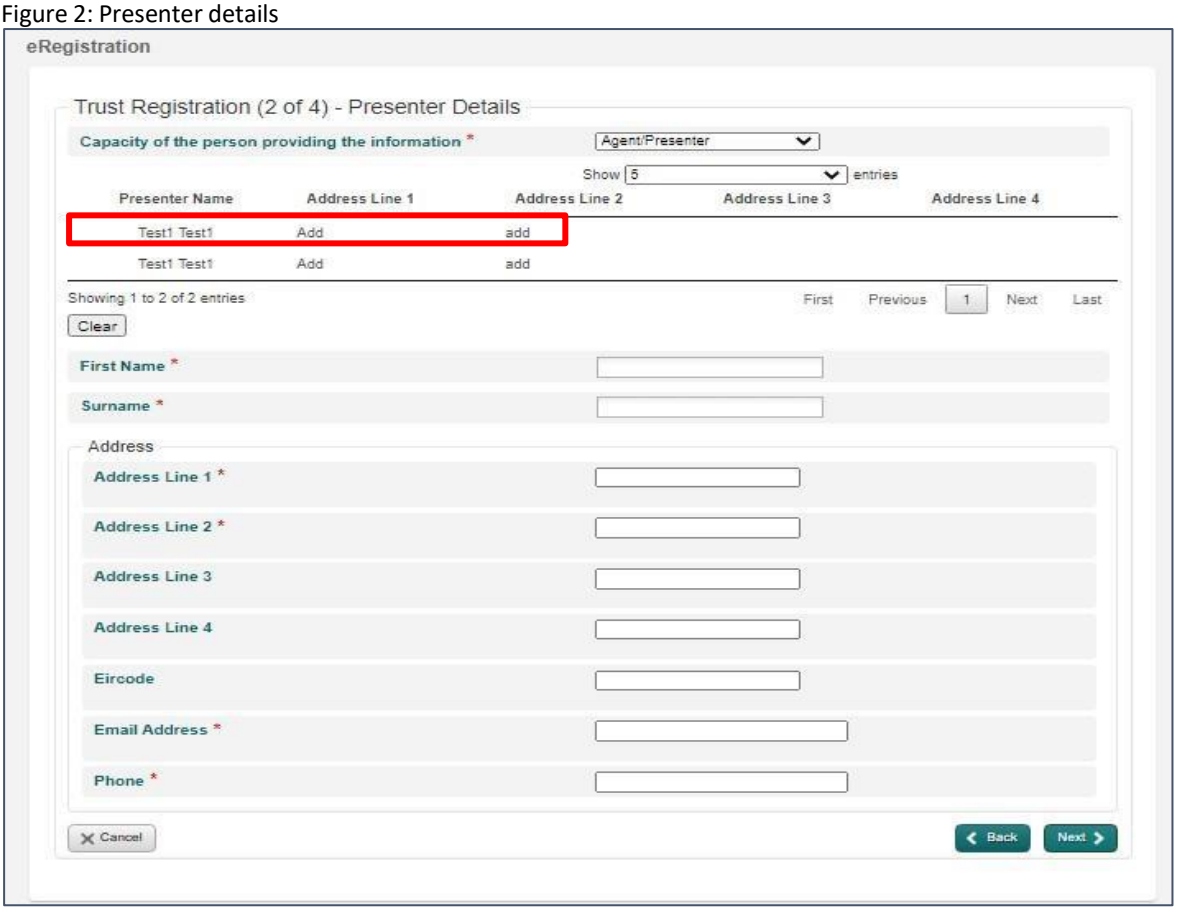
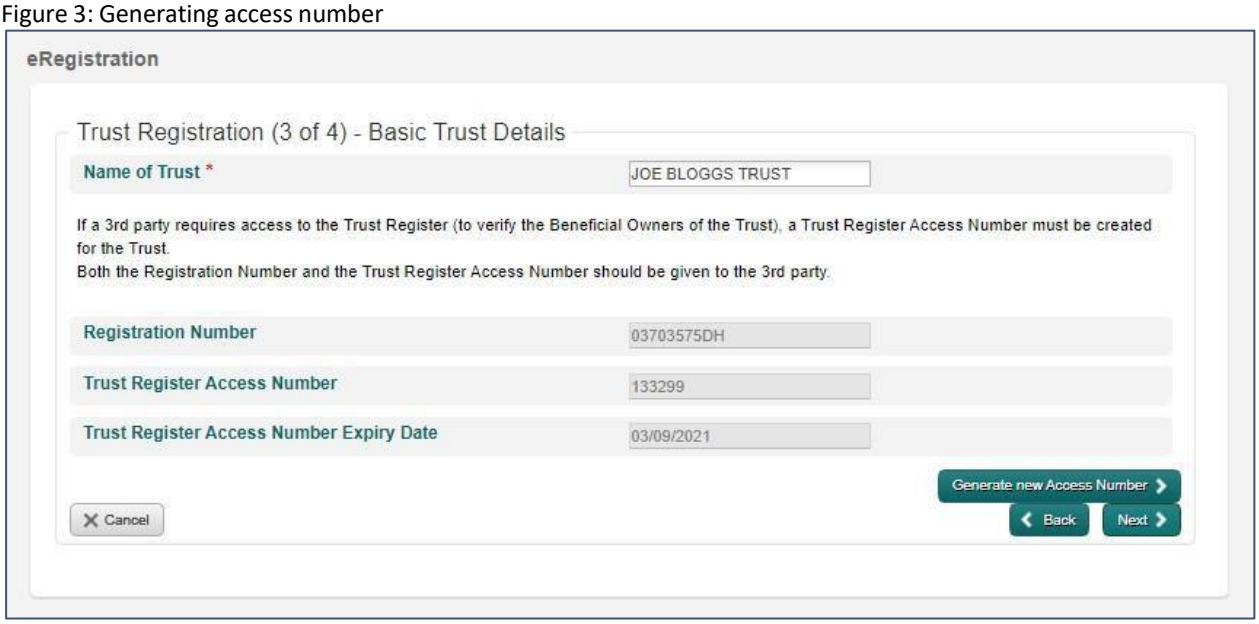


Figure 3: Generating access number



1.2 Can an access number be cancelled?

No. You cannot cancel an Access Number.

1.3 Can an Access Number expiry date be extended?

No. You can generate a new Access Number once the current one has expired.

1.4 Can an Access Number be provided to more than one designated person at the same time?

Yes. Anyone provided with the number can use it to verify a relevant trust.

1.5 I am a trustee, I assigned registration of the trust to an agent/advisor/other representative. How do I provide an Access Number to a designated person?

All trustees can provide Access Numbers, once the Trust has been registered on CRBOT.

- On ROS enter the Trust Register Functions section.
- You will see all trusts registered on CRBOT in which you are a trustee.
- Select the relevant trust.
- You will then see the screen in figure 3. Above (or similar screen in myAccount), allowing you to generate an Access Number.

Beneficial Ownership information provided

2. What information can a designated person view when they access the register?

Designated persons can view the following information for each beneficial owner of the trust:

- Name
- Beneficial Owner Type
- Month & Year of Birth
- Country of Residence
- Nationality
- Nature & Extent of Interest Held

2.1 Can the beneficial ownership details be printed?

Yes. There will be an option to print beneficial ownership details as above via pdf. This pdf will also provide the Trust name, registration number & issue date.

2.2 Can information regarding a minor be viewed by a designated person on CRBOT?

No. Minor information cannot be viewed.

Designated persons will be notified by a highlighted information note (see figure 7) if beneficial ownership information relates to a minor. If a designated person requires access to beneficial ownership information on CRBOT that relates to a minor[1], they must provide, in writing to the Registrar, a summary of the grounds on which he or she considers it is in the public interest that that information be disclosed to him or her.

If a designated person wishes to request access to minor information, they need to submit the following 'CRBOT Minor Information Access Request Form'. This form is available in our 'Forms & Guidance Material for CRBOT' section here and must be submitted via MyEnquiries.

Getting Access to the Register

3. I am a designated person. How do I access CRBOT in order to carry out due diligence on a trust?

A trustee of the trust or their representative must provide you with an Access Number and the Trust Registration Number. These details will allow the designated person to view the beneficial ownership details of the registered trust.

3.1 How long is the access number valid for?

The Access Number is valid for ninety consecutive days. Designated persons can confirm the expiry date with the trustee or representative (if applicable).

3.2 Can the access period be extended?

The access number provided cannot be extended, however when the number expires another number can be generated.

3.3 I am a designated person and have been given an access number. How do I view a trust on CRBOT?

On ROS, under **"TAIN Services"** tab, go to **"Other Services"** and select **"Trust Register Functions"** (see Figure 4). There will be an option to "**Verify Trust Details"** (see Figures 5 & 6). The Beneficial Ownership information will be viewable and printable (Figure 7 & 8).

To Verify a Trust, you will need:

- Trust Register Access Number (provided by the trustee or a representative acting on their behalf) • Trust Registration Number
- You should also be aware of the Access Number expiry date. The Trustee will have this detail.

[1] Regulation 27 (8) SI 194 of 2021

Figure 4: ROS Location

Figure 5: Verify a Trust

Figure 6: Enter Trust Registration number and Access Number (as provided by the Trustee).

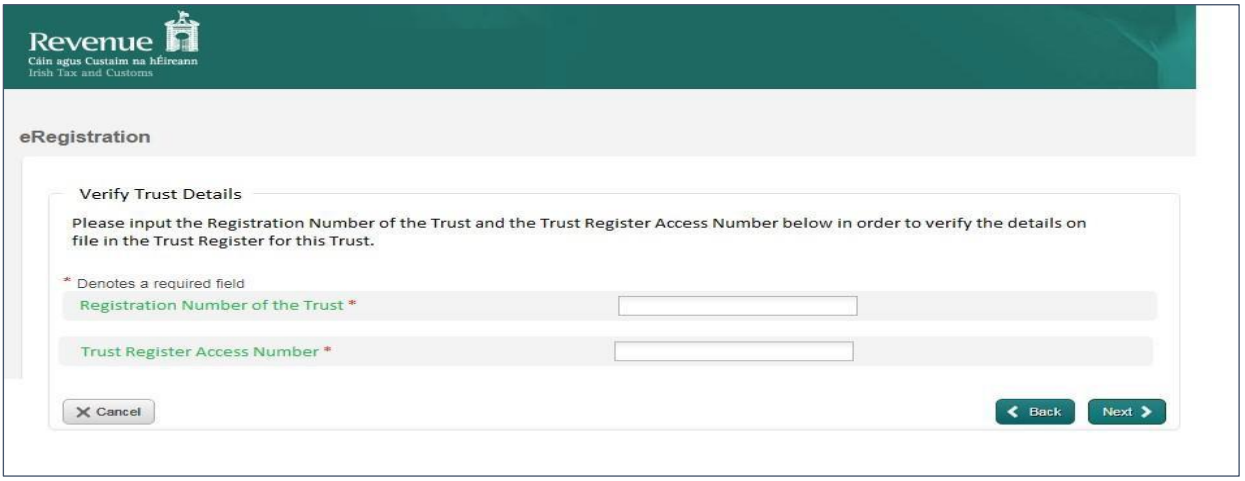


Figure 7: Review of BO details

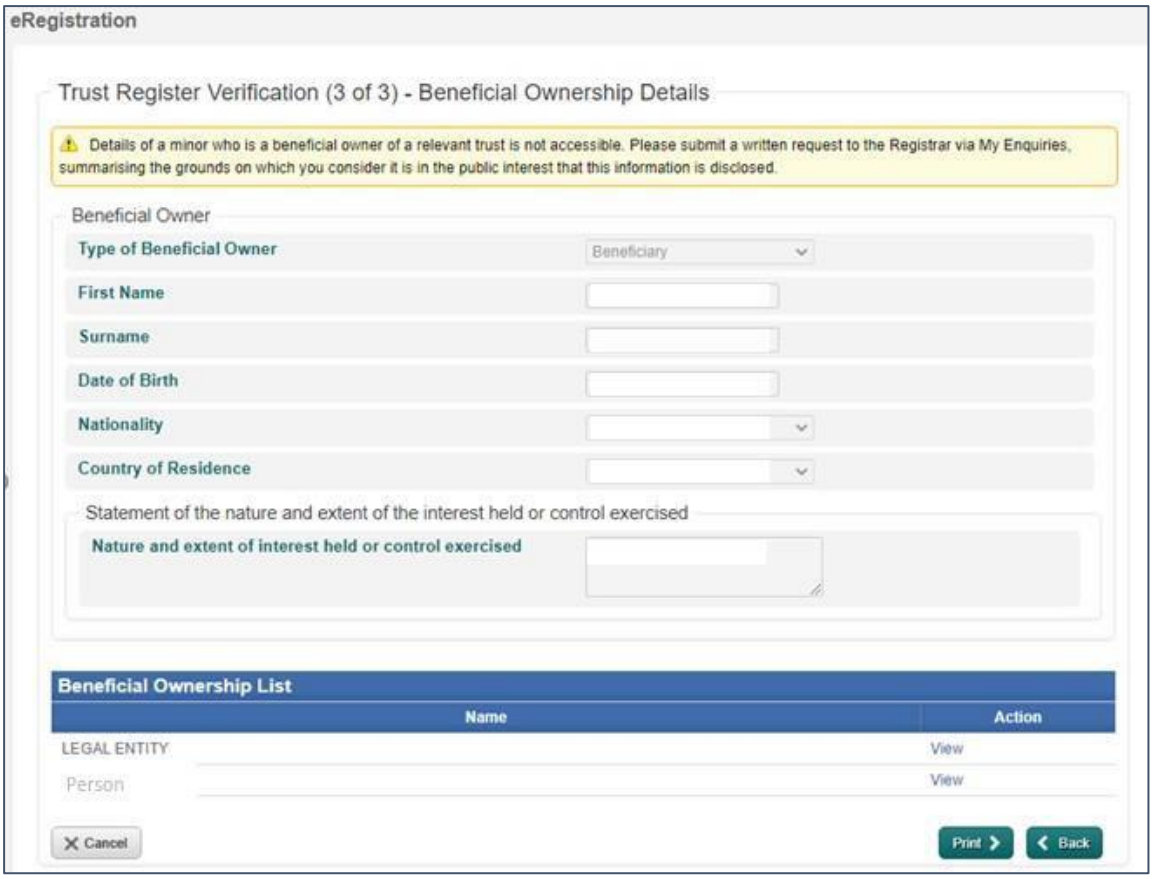
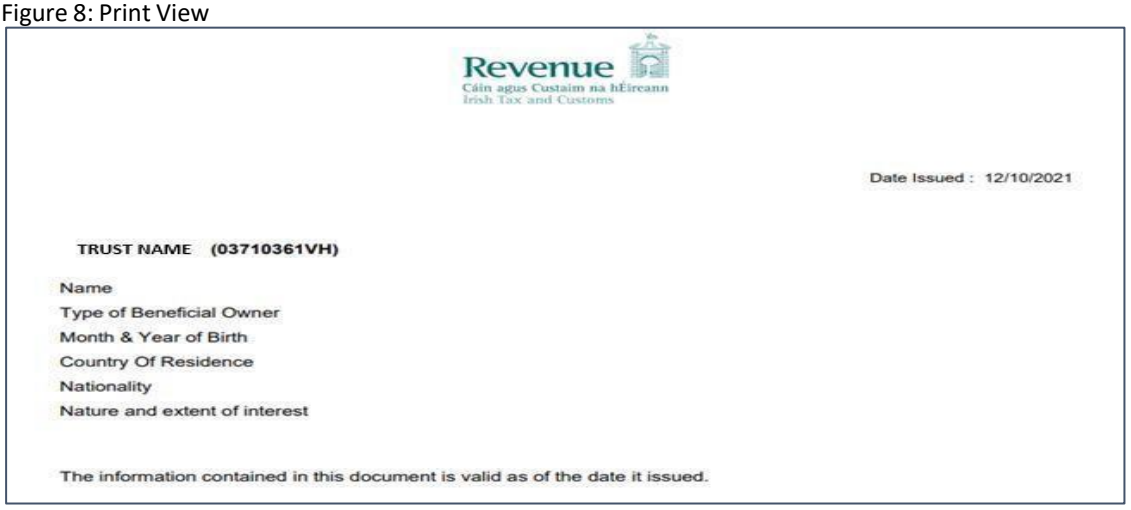


Figure 8: Print View



Discrepancy Notice

4. What is regarded as a discrepancy for the purposes of inspecting the trust register as a designated person?

Where a trust enters into an occasional transaction or forms a business relationship with a designated person, and in the course of undertaking due diligence, the designated person forms the opinion that there is a discrepancy between the trust's internal register & CRBOT, on the following Beneficial Owner particulars:

a) the name, birth month/year, nationality, and country of residence or
b) the statement of the nature and extent of the interest held, or the nature and extent of control exercised

then the designated person shall deliver, in a timely manner, to the Registrar, a notice of that opinion, specifying the particulars of the discrepancy.

4.1 Can a de minimis approach be applied to discrepancy reporting obligations[2] for designated persons, to allow the exclusion of ancillary items such as slight name variations etc?

The Beneficial Ownership information (name, DOB, address, nationality & nature/extent of interest/control) on CRBOT and the trust's beneficial ownership register is centred on identification of the Beneficial Owner and accurate data on the control and interest.

Where an Irish version of a name is used this name must correspond to what has been entered in the internal register. If different language versions of a beneficial owner's name are found between the internal register and CRBOT then this would be regarded as a discrepancy.

4.2 How are discrepancies reported to the Registrar?

A 'CRBOT Discrepancy Notice Form' must be completed and submitted via MyEnquiries on ROS or myAccount. This form is available in our 'Forms & Guidance Material for CRBOT' section here.

MyEnquiry contact:
Enquiry relates to:
Trust Register (Central Register of Beneficial Ownership of Trusts) More specifically:
Discrepancy Notice

4.3 The trust is not registered on CRBOT or the trustee is refusing to provide the information as required under due diligence measures.

A trustee who fails to comply with the regulations[3] under SI 194 of 2021 commits an offence and shall be liable- a)

on summary conviction, to a class A fine, or

b) on conviction on indictment, to a fine not exceeding €500,000.

Please provide relevant details to the Registrar via MyEnquiries (see point 4.2 above)

[2] Regulation 22 (3) SI 194 of 2021
[3] Regulation 7 (9) SI 194