

# CBI's Revised Risk Evaluation Questionnaire



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## Background

The Central Bank of Ireland's (CBI) Risk Evaluation Questionnaire (REQ) is a mandatory regulatory return for a variety of credit and financial institutions, supporting the CBI's riskbased antimoney laundering (AML), countering the financing of terrorism (CFT) and financial sanctions (FS) supervisory model and enabling more datadriven oversight of the Irish financial sector. It is a structured regulatory questionnaire designed to gather detailed information from firms covering two central themes:

1. The firm's own assessment of AML/CFT risk within its business; and
2. The firm's AML/CFT framework, including governance, policies, procedures, risk mitigation and control and transaction monitoring processes.

This information is valuable to the CBI because it supervises regulated entities using a riskbased supervisory model. The REQ, therefore, allows the Central Bank to collect information on key risk indicators which feed directly into its supervisory planning, firmspecific inspection cycles, thematic reviews and prioritisation of supervisory resources.

From a compliance perspective, the REQ ensures firms remain accountable for maintaining a robust AML/CFT framework. Its completion requires input from senior management and, most importantly, includes a statement of compliance that must be signed by a suitably senior individual authorised by the Board. This requirement reinforces the principle that AML/CFT compliance is a boardlevel responsibility.

Over the years since its inception, the REQ has continued to evolve, reflecting changes in the

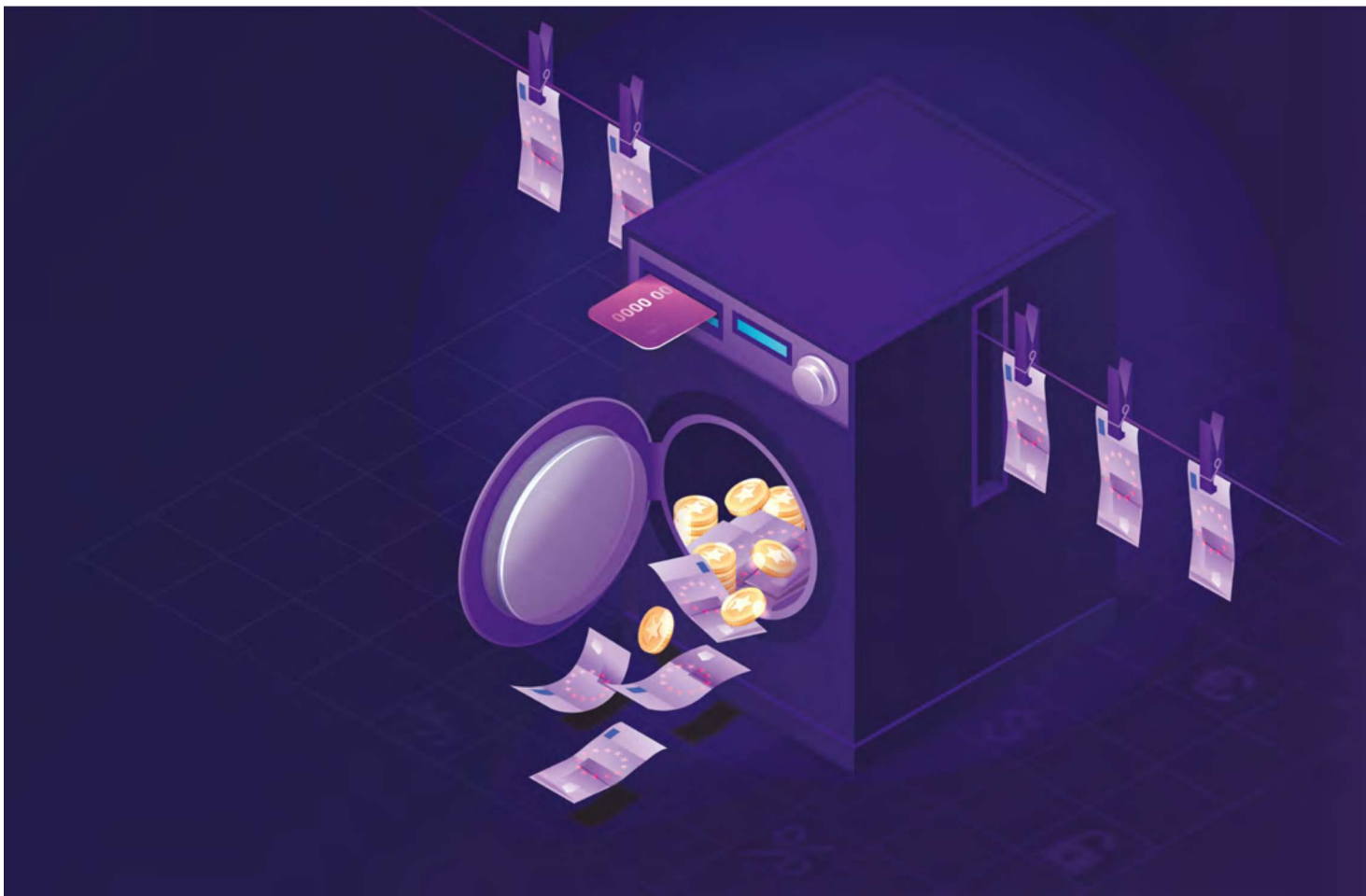
regulatory and legislative landscape in Ireland and the EU and changes in global financial crime standards.

## The Revised Risk Evaluation Questionnaire

Following an extensive period of industry consultation, the Central Bank of Ireland launched its revised Risk Evaluation Questionnaire (REQ) for credit institutions on 30 June 2025. The revised REQ replaces and enhances the previous questionnaire, which contained c.70 questions, with new sector-specific templates, containing more than 500 data points, tailored for credit institutions (such as retail banks) and payment/electronic money institutions. It marks a significant shift in antimoney laundering (AML) supervision; one that demands enhanced data capabilities, cross-functional coordination and strategic planning. This shift reflects the Central Bank's ambition to deepen its data-driven, agile supervisory model, aligning closely with Financial Action Task Force (FATF) standards and the new EU AML regulatory framework.

## Enhanced Data Requirements

A feature of the new REQ is that it has significantly more granular data requirements, particularly at customer and transaction level. The template includes expanded fields across inherent risk indicators, mitigation and control measures, physical presence, beneficial ownership structures, geography of funds flows, pooled accounts and correspondent relationships. While this level of detail will help to improve supervisory insights, it also increases operational complexity for financial institutions to extract, consolidate and report across diverse systems and products. Enhanced technical and reporting requirements mean that firms must now submit the REQ in XML



format, adhering to defined XSD schemas, with detailed instructions provided through updated guidance notes.

### Operational Challenges

The Central Bank has taken a phased approach to the introduction of the revised REQ.

- For the reference date 31 December 2024, the submission deadline for payment and e-money institutions is 13 February 2026, for credit institutions is 27 February 2026, for investment firms is 30 June 2026 and for crypto-asset service providers is 31 July 2026.
- For the reference date 31 December 2025, the submission deadline is 31 August 2026.

The Central Bank will be introducing new sector specific REQs for remaining sectors within its supervisory population during 2026.

The increased scope and granularity of the data required for the revised REQ necessitates significant additional work across in-scope firms. In order to provide the data in the format specified and within the deadline set by the Central Bank, firms may find it helpful to establish a dedicated crossfunctional working group. A working group

would bring together expertise from Financial Crime (AML), Finance, IT, Risk, Operations and Product teams to collectively assess the data being sought, determine the optimum and most reliable source for each data point and coordinate the endtoend delivery.

Collating the considerably expanded dataset presents a number of challenges, including:

- Crossfunctional coordination: The breadth of data required spans multiple areas and operational teams across first, second and third lines of defence which must align on data definitions, ownership and extraction approaches.
- Data extraction complexity: Some data points, particularly those involving historical records, digital channel activity, transactionlevel granularity and beneficial ownership details, require complex extraction processes. In several cases, the data has not previously been captured or reported at the level now required, adding further technical and operational effort. By way of example, the REQ seeks information on non-cash payment flows broken down by country of origin or destination and then further broken down to specify those related to high-risk customers.



- **Technical formatting requirements:** The completed REQ must be submitted in XML, in strict adherence with the XSD schemas and CBI portal submission protocols. This requires precise mapping of internal data fields to the schema, validation of the XML structure, and multiple rounds of testing to ensure compatibility with the Central Bank's submission environment.

While the Central Bank has provided templates, guidance notes and sample XML/Excel builds, the level of precision required in the mapping combined with the need to resolve formatting, definitional and technical queries have proven both time and resource intensive. There remain some data points within the new template for which the guidance may benefit from further clarification. The Central Bank's taxonomy and categorisation of products, services, customer segments and sectors may not align with firms' internal taxonomies. It would be therefore essential that firms clearly document any interpretations, assumptions or methodological decisions, for example in a basis of preparation document, applied in completing the REQ, to ensure consistency, transparency and traceability during any subsequent supervisory review or validation exercise.

## Conclusion

The Central Bank has stated that it sought to ensure that the sector specific REQ aligns to the greatest possible extent with the data requests that will be emanating from the EU Anti-Money Laundering Authority (AMLA). In its 2025 Supervisory Outlook, the Central Bank outlined the changes in its supervisory model have been made to address the challenges of a more complex and interconnected financial landscape. The revised REQ signals a move to gather more data and intelligence to meet the increasing demands of greater regulatory oversight. For compliance professionals, keeping pace with these developments and embedding data driven and REQaligned risk insights in business-wide AML/CFT frameworks will remain key to demonstrating the maturity and effectiveness of the AML/CFT framework in their firms.