



24 August 2020

Due to the increased instance of remote working arising from the COVID-19 pandemic, the Central Bank of Ireland has received queries from regulated firms regarding the admissibility of electronic signatures as opposed to ‘wet ink’ signatures (i.e. signing a document by hand using a pen) in relation to regulatory documents and forms submitted to us.

The Central Bank confirms its Policy regarding the use of electronic signatures is that, in the absence of any specific legal provisions to the contrary, regulated firms may use electronic signatures in submitting regulatory documents and forms to the Central Bank. Individuals are reminded that those signing regulatory documents and forms in electronic form will be accountable for the content of the document in the same way as if they had signed the document in ‘wet ink’.

The Central Bank reserves the right to request a ‘wet ink’ signature where the Central Bank deems it appropriate in all the circumstances of the case.

We may review this Policy as practices continue to evolve and change, while recognising that many regulatory documents and forms are currently processed electronically.

We do not propose to comment on the use of electronic signatures more generally, and advise regulated firms to seek their own legal advice on the appropriateness of electronic signatures in specific circumstances. The Central Bank expects firms to continue to meet their regulatory and statutory obligations on an ongoing basis including the requirement to have adequate internal systems and controls.