



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR)

File, Schema and Record Validation Rules

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Version Control

Version	Author	Comments	Published Date
1.0	Central Bank of Ireland	Published Version to CBI Website	October 2022
1.1	Central Bank of Ireland	Added note regarding character set issues when using MS Word Correction in validations F2 and F4 regarding SDB file naming convention	November 2022
1.2	Central Bank of Ireland	Removed reference to Alphanumeric from section S11.1	February 2023
1.3	Central Bank of Ireland	Updates to schema validation section to include most commonly experienced schema validation failures	March 2023
1.4	Central Bank of Ireland	Updates to reflect updates to ISBAR schema October 2023: 1) Update S3, S8 and S10.1, S11.1 and S14.1 to include additional characters allowed 2) Addition of S14.7 to reflect new validation on leading/trailing spaces	September 2023

Introduction

Article 32a of the Fifth EU Anti-Money Laundering Directive ((EU) 2018/843) ('5AMLD'), and certain Articles in EU Anti-Money Laundering Directive ((EU) 2019/1153) ('5AMLD additional') set out requirements for Member States to maintain a central register/retrieval system of beneficial ownership details of Bank & Payment accounts and Safe Deposit Boxes held by financial institutions. The Central Bank will be the sole authority responsible for maintaining Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR).

To adhere to their reporting obligations, financial institutions will be required to submit Bank, Payment account and Safe Deposit Box data, as prescribed in the relevant ¹legislation, via the Central Bank of Ireland Portal. The reporting process is as follows:

- All in-scope institutions will be required to upload data files to ISBAR via CBI Portal in accordance with the latest schema as issued by the Central Bank;
- All data files uploaded will need to pass a level of validation, at file, schema and record levels;
- Details of any errors encountered, will be accessible to the reporting institution.

The purpose of this document is to provide guidance to institutions on the validation rules pertaining to ISBAR file uploads and data processing.

¹ The European Union (Anti-Money Laundering: Central Mechanism for Information (S.I. 46 of 2022) (the "Regulations") were introduced in February 2022 and the regulations set out the data that Credit Institutions must provide to ISBAR.

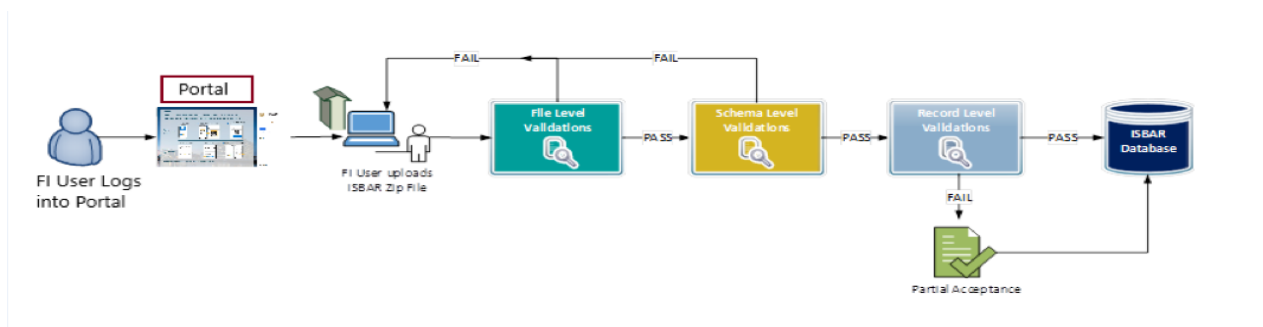
Overview

Financial Institutions are required to report all customer accounts identifiable by IBAN and all Safety Deposit Boxes offered to customers. This extends to both natural persons and non-natural persons (i.e. entities and legal arrangements).

Validation of submissions by Institutions are performed at 3 levels:

- (1) File Level Validations: these are validations relating to the file encompassing file naming convention, file size and file format for both the Bank Account and Safe Deposit Box files; and
- (2) Schema Validations: these are validations to ensure adherence, at a field level, to the field length, format and mandatory / optional field level conventions; and
- (3) Record Level Validation: validation of individual records to identify if there are records where erroneous data exists.

High Level Process Diagram



All data fields are mandatory unless otherwise specified – a description of each data point is detailed in the sections below.

If no value is required in an OPTIONAL marked field, this should be left BLANK. E.g. If an AccountClosing date is not applicable because the account is still open, the XML attribute should be provided with a blank value (AccountClosingDate=""). This means that XML attributes should never be omitted completely.

File Level Validations

Where a file fails any of the below **file level validations**, the entire file will be rejected. The CBI Portal user who uploaded the file will be notified, via e-mail, of each validation failure. This email will include:

1. The file name; and
2. A description of the type of failure.

In the event of a file level validation failure the file status on CBI Portal will be displayed as **Rejected**.

Note: The validation process will only report on the first file level validation error encountered in sequence. At this stage processing will be halted and an error notification sent. If an updated file is submitted and a different file level validation is encountered the file will again be rejected and an error message generated.

Validation #	Validation Name	Description
F1	.zip File Size	The maximum Bank Account Return / Safe Deposit Box Return file size upload is 80MB when compressed
F2	.zip File Name	<p>The file shall only be processed by the system if it adheres to the following naming convention:</p> <p>C-Code_YYYYMMDD_BAR.zip or C-Code_YYYYMMDD_SDB.zip</p> <ol style="list-style-type: none"> 1. C-Code – the C-Code is the identifier for the institution (e.g. C999) 2. YYYYMMDD is the reporting date of the file submission (e.g. 20220802) 3. BAR / SDB is the file identifier (i.e. Bank Account Register or Safe Deposit Box) 4. Extension is .zip <p>Note: The C-Code on the .zip file must match the C-Code of the logged on Financial Institution</p>
F3	No. of Files	The .zip file shall only contain one .xml file
F4	.xml File Name	<p>The .xml file shall only be processed by system if it adheres to the following naming convention:</p> <p>C-Code_YYYYMMDD_BAR.xml or C-Code_YYYYMMDD_SDB.xml</p> <ol style="list-style-type: none"> 1. C-Code – the C-Code is the identifier for the institution (e.g. C999)

2. YYYYMMDD is the reporting date of the file submission (e.g. 20220802)
3. BAR / SDB is the file identifier (i.e. Bank Account Register or Safe Deposit Box)
4. Extension is .xml

Note: The C-Code on the .xml file shall be required to match the C-Code of the logged on Financial Institution

Schema Validations

Where a file fails any of the below **schema validations** the entire file will be rejected by the System. The CBI Portal user who uploaded the file will be notified via an email that the file has been **rejected**. The specific error will not be detailed in the email.

Schema validations will concentrate on the following:

1. Validation of content, structure and that the content adheres to the conventions as specified in the 'Validation' column on the table below e.g. for Permitted character sets etc...;
2. Field lengths are as specified; and
3. Whether fields that are designated as mandatory are populated.

The most common schema errors in relation to the above are as follows:

- Malformed xml in the form of missing closing tags
- Invalid namespace declarations
- Numeric values in alpha fields (ForeName, LastName)
- Spaces in county field
- Invalid date formats
- Incorrect sequence of elements in xml

In the event of a schema level validation failure the file status on Portal will be displayed as **Rejected**.

Validation #	Validation Name	Validation	Length	Is Mandatory?	Notes
S1	IBAN	2 alpha (IE), 2 Numeric, 4 alpha, 14 numeric.	22	Y	Standard Date Type in XSD schema. Mandatory for the Bank Account Return only
S2	SafeDepositBoxID	Alphanumeric only	100	Y	Mandatory for Safety Deposit Box Return only
S3	AccountName	Alphanumeric	100	Y	Name on Account. May be either Entity name or Individual name.

		Permitted Characters are as follows² A to Z, a to z, numbers (0-9), special character as follows: `!#\$%^&*()-_+[]{}“’@\/ .,:; and the following accented characters. Á Á à á Â â Ã ã Ä ä Å å Æ ç Ç ċ Ď é Ê è Ë ë Ì í Î î Ï ï ñ Ñ Ó Ò ï Ô ô Ö ö Õ õ Ø ø oe OE ß š ú Ú ù Û û Ü ü Ÿ ž			
S4	AccountOpeningDate	YYYY-MM-DD	10	Y	Standard Date Type in XSD schema.
S5	AccountClosingDate	YYYY-MM-DD	10	Conditional	Standard Date Type in XSD schema. Where an account is closed this must be provided see rules R3.1 and R3.2 for more detail on closed accounts
S6	LesseeStartDate ³	YYYY-MM-DD	10	Y	Relevant to Safety Deposit Box Return only.
S7	LesseeEndDate	YYYY-MM-DD	10	Conditional	Relevant to Safety Deposit Box Return only. Where a Safety Deposit box lessee period has ceased this date must be provided.
S8	EntityName	Alphanumeric Permitted Characters are as follows A to Z, a to z, numbers (0-9), special character as follows: `!#\$%^&*()-_+[]{}“’@\/ .,:;	100	Y	Provide details for each entity (not natural persons) in the following fields. Repeat all Entity fields for each Entity on the Account. An unlimited number of entities may be provided on each account record.

² A number of MS Word ASCII character Unicodes are different to the characters in the Schema. For example, MS Word represents an apostrophe as a right single quotation mark and not an apostrophe. To avoid character character Unicode errors, Credit Institutions should not copy any data from MS Word files to their Schema file.

³ “Lessee start and end date” refers to the Safety Deposit Box lease period

S10.5	EntityCounty	Lookup of Counties	9	N	Select County value from Dropdown list. Where no county is known this field can be left blank or the blank option in the dropdown can be selected (See Appendix A for list of counties)
S10.6	EntityCountry	Lookup of Countries	3	Y	ISO-3166 – List of countries and the 3 letter country code
S10.7	EntityEircode	Alphanumeric only	7-8	N	Only submit Irish Eircode, no UK or other postcodes in this field
S11.1	PersonFirstName	<p>Permitted Characters are as follows Letters A to Z, a to z, dashes, and the following accented characters.</p> <p>Á Á à á À â Â ã Ã ä Å æ Æ ç Ç Ć ċ Ď é É è Ê ë Ë ě Ě í î ï ï Ĩ Ñ Ó ò Ò ô Ô ö Ö õ Õ ø Ø oe OE ß ú Ú ù Ù û Ü ü Ÿ ž</p> <p>The only special characters that are permitted are the following: / - . () ‘</p>	100	Y	Provide details for each person (Account Holders/ Beneficial Owners i.e. Natural Person) in the following fields. Repeat all Person fields for each person on the account An unlimited number of persons may be provided on each account record.
S11.2	PersonMiddleName	Permitted Characters as Per Person First Name	100	N	
S11.3	PersonLastName	Permitted Characters as Per Person First Name	100	Y	
S12	PersonDateOfBirth	YYYY-MM-DD	10	Y	DOB is mandatory in case of natural persons
S13	PersonPartyToAccount	Lookup field – see possible values in Notes Section	3	Y	<p>Must be one of 3 roles:</p> <ul style="list-style-type: none"> • CAH for customer-account holder • PPA for person purporting to act on behalf of

					<p>the customer-account holder</p> <ul style="list-style-type: none"> • BOC for beneficial owner of the customer-account holder <p>Refer to the Party to Account overview in Appendix B</p>
S14.1	PersonAddress1	<p>Alphanumeric</p> <p>Permitted Characters are as follows A to Z, a to z, numbers (0-9), special character as follows: ` ! # \$ % ^ & * () - _ = + [] { } “ ’ @ \ / . , ; ; and the following accented characters.</p> <p>Á Â Ã Ä Å Æ Ç È É Ê Ë Ì Í Î Ï Ñ Ò Ó Ô Õ Ö Ø Ù Ú Û Ü Ý Þ ß à á â ã ä å æ ç è é ê ë ì í î ï ñ ò ó ô õ ö ø ù ú û ü ý þ ÿ</p>	100	Y	
S14.2	PersonAddress2	Permitted characters as per address line 1	100	N	
S14.3	PersonAddress3	Permitted characters as per address line 1	100	N	
S14.4	PersonAddress4	Permitted characters as per address line 1	100	N	
S14.5	PersonCounty	Lookup list of Counties	9	N	<p>Select County value from Dropdown list.</p> <p>Where no county is known this field can be left blank or the blank option in the dropdown can</p>

					be selected. (See Appendix A for list of counties)
S14.5	PersonCountry	Lookup list of Countries	3	Y	ISO-3166 – List of countries and the 3 letter country code
S14.6	PersonEircode	Alphanumeric only	7-8	N	Only submit Irish Eircode, no UK or other postcodes in this field
S14.7	Leading / Trailing Spaces in All Fields	Not Permitted	N/A	N	Schema failure will occur where any leading or trailing spaces are present in any information field.

Record Level Specification

Where a file passes the file and schema validations outlined above but **one or more records on the file fails the record level validations** outlined in the table below:

1. The file status will be displayed as **partially accepted** by the system;
2. The failed record's IBAN/Safety Deposit Box ID number will be included on an **error feedback file**, which will be the user can download via CBI Portal;
3. The **error feedback file** will be available for 10 calendar days before being permanently deleted; and
4. An **email will be sent to the CBI Portal user** notifying them that there has been a validation failure. This email will not contain details of the failures. This information can only be accessed via the **error feedback file**.

The CBI Portal user must rectify the errors and submit the previously failed records as a ***delta upload**.

Validation #	Validation Name	Description
R1	Person Name	Each Record must contain a Person First Name and Last Name OR an Entity Name as these are mandatory fields (as per the schema).
R2.1	Entity or Person Party to Account	Each record must have at least one Party to Account of 'CAH' (Customer-Account Holder) which may be either a Person or an Entity.
R2.2	Person Party to Account	<p>Where the Entity Party to Account is populated with a value of CAH for a particular record, there must be at least one person detailed on that record with a role of 'Beneficial Owner of the Customer account holder' ('BOC') in the Person Party To Account field.</p> <p>*Note: for corporate entities listed on a regulated market, reporting financial institutions can enter the following data for the BOC:</p> <ul style="list-style-type: none"> • Party to Account - BOC • Person First Name: Exempt • Person Last Name: Exempt • DOB: 1900-01-01 • Address Line 1: Exempt • Country: IRL
R3.1	Closing Date	Account Closing Date on the record must not be greater than 5 years prior to the current date of submission of the file.
R3.2	Closing Date	Account Closing Date on the Record must not be earlier than date of enactment of the BAR Legislation i.e. 3 rd February 2022

*Credit Institutions are reminded to refer to the guidance with regard to failed submissions. Where a submission has been partially processed (i.e. some records have been uploaded to ISBAR and some records failing validation have been rejected), Credit Institutions should rectify the failed records at source and resubmit these as part of a delta upload. It is not necessary to resubmit the entire file as this will give rise to unnecessary processing of records which were successfully uploaded to ISBAR. Delta uploads should only include changes to existing records on ISBAR or the addition of new records to ISBAR.

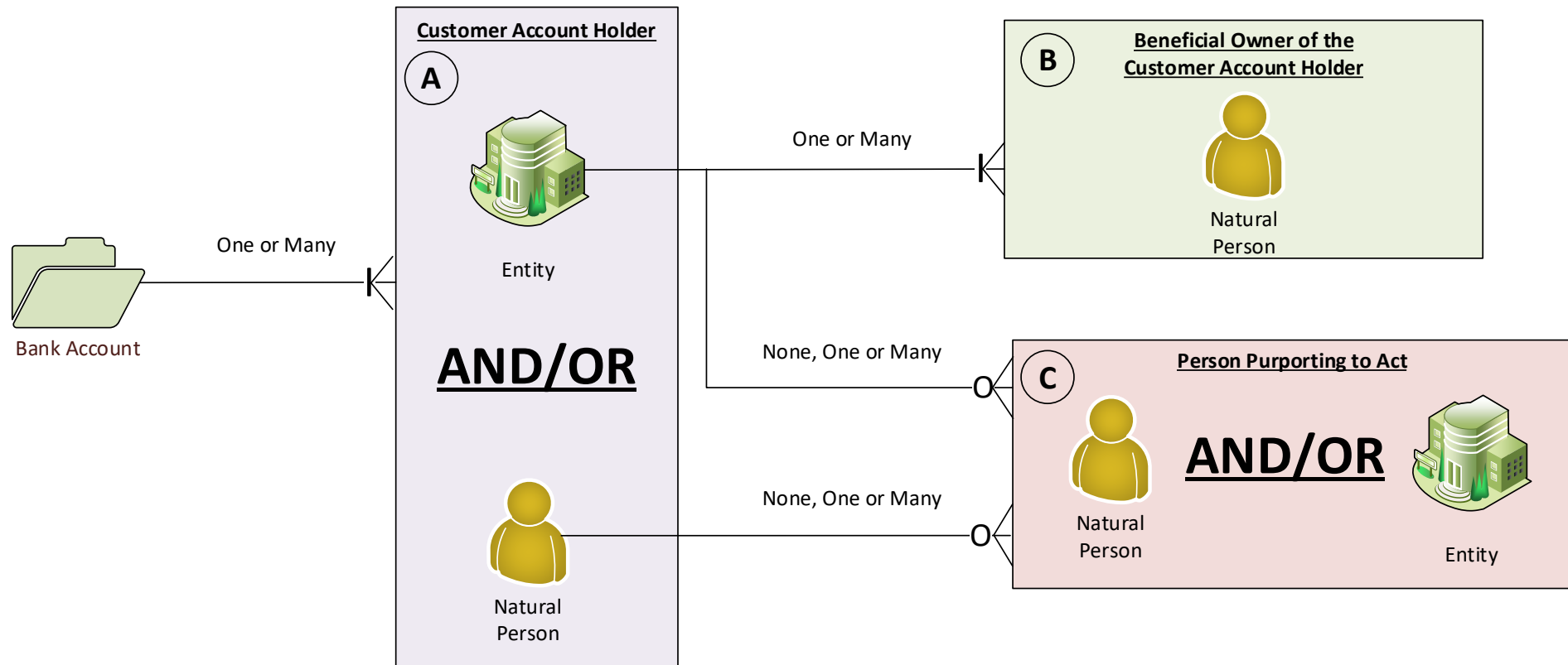
Validation Summary

Validation Type	Purpose of Validation	ONR Status if Validation Fails
File Validation	Validation of file naming convention, file size and file extension etc...	Rejected
Schema Validation	Validation that field level rules for character set, IBAN structure, data present in mandatory fields etc...	Rejected
Record Level Validation	Ensure that record level rules are adhered to e.g. each record has a Party to Account value of CAH, where CAH is an Entity that a Person Party to Account value of BOH is present	Partially Accepted

Appendix A – County Dropdown List

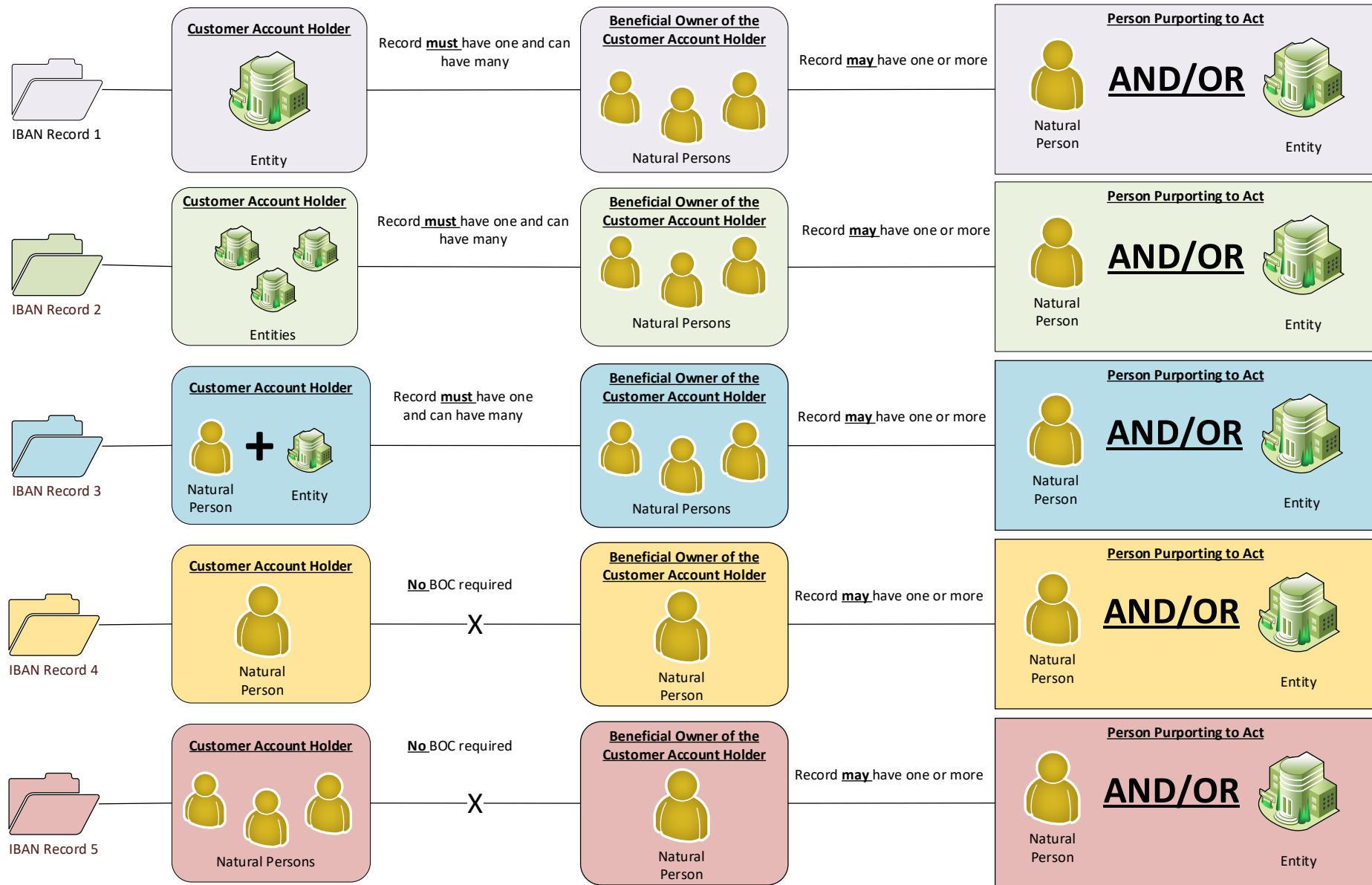
CountyName
(blank)
Antrim
Armagh
Carlow
Cavan
Clare
Cork
Derry
Donegal
Down
Dublin
Fermanagh
Galway
Kerry
Kildare
Kilkenny
Laois
Leitrim
Limerick
Longford
Louth
Mayo
Meath
Monaghan
Offaly
Roscommon
Sligo
Tipperary
Tyrone
Waterford
Westmeath
Wexford
Wicklow

Appendix B – Party to Account Overview



- A** Each record **must** have at least one Party to Account of CAH which can be either an Entity **or** Natural Person.
- B** Where a record does not have a Natural Person as a CAH (i.e. Entity only), the record **must** have a BOC who is a Natural Person.
- C** A record **may** have one or many PPAs which can be either Natural Person or Entity

Appendix C – Party to Account Scenarios



All queries regarding the Bank Account and Safety Deposit box returns will be managed by the Regulatory & Services Business Department (RBSD) within the Central Bank. Please email ISBAR@centralbank.ie for all register related queries.

For CBI Portal support, please contact the Online Reporting helpline at 01 224 4545 or email onlinereturns@centralbank.ie

