

Guide to Submitting DORA Registers of Information on the Central Bank of Ireland Portal

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1 Glossary of Terms

Term	Description				
C Code	The financial entity's identification number that is used for the Portal				
Central Bank	The Central Bank of Ireland				
DORA	Digital Operational Resilience Act (DORA) (Regulation (EU) 2022/2554)				
ЕВА	European Banking Authority				
ESAs	European Supervisory Authorities				
EU-ID	European Union Identification Number				
ICT	Information and Communication Technology				
LEI	Legal Entity Identifier				
Portal	The Central Bank of Ireland Portal used to submit Register of Information returns <u>here</u>				

2 Checklist

Financial entities subject to the Digital Operational Resilience Act (DORA) (Regulation (EU) 2022/2554) are required to submit Registers of Information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers, which they maintain in accordance with Article 28(3) of DORA.

When submitting a DORA Register of Information return on the Central Bank of Ireland (Central Bank) Portal, the following checklist may be of assistance.

- Registers of Information should be submitted via the Portal during the window specified on the DORA Reporting Registers of Information page for 2025. (This will change in 2026 and updates will be issued prior to same).
- The financial entity has followed the <u>Implementing Technical Standard</u> on the Register of Information¹, including subsequent clarifications via the ESAs Registers FAQ (available via the EBA register preparation site linked below) and the ESA DORA QAs.
- The financial entity has reviewed and understands the information on the EBA website regarding preparations for reporting of DORA Registers of Information, in particular the slides on preparing the reporting package might help you.
- The file type to be used by financial entities is a 'plain-csv' (xBRL OIM-CSV) file in accordance with EBA taxonomy 4.0. In this regard, financial entities are strongly encouraged to review the above link to the EBA website on how to prepare the Registers of Information.
- The name of the ZIP file (.zip) file adheres to the naming convention outlined in section 5.2 of this document.
- The financial entity submitting a Register of Information return has a valid LEI code.
- The financial entity has reviewed sections 5.3 (Correct Format) and 5.4 (Common Issues) of this document before submitting a query to the Central Bank.
- The ICT third-party service providers listed in the Registers of Information have valid LEI codes or EU-IDs in order for the returns to pass validation, along with meeting the other requirements mentioned above unless otherwise advised in ESA FAQs or DORA QAs.

¹ Commission Implementing Regulation (EU) 2024/2956

- The users responsible for submitting, finalising and signing off the Registers of Information have the necessary access permissions to submit the DORA Register of Information on the Portal. Please see here for more details on Portal user permissions.
- In the event that the financial entity's or Central Bank's systems are unavailable, or if experiencing technical issues with the Portal, please email onlinereturns@centralbank.ie or call 01 224 4545. If unable to submit Register of Information return, please contact the relevant supervisory team in the Central Bank using existing communication channels. Once any technical/operational issues have been resolved, the expectation is that the Register of Information return will be submitted on the Portal as soon as practicable..

Overview

1.1 Purpose of this Guide

Financial entities subject to DORA are required to submit Registers of Information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers, which they maintain in accordance with DORA Article 28(3). Registers of Information should be submitted via the Portal on an annual basis.

This document provides systems guidance for financial entities subject to DORA in relation to submitting Registers of Information on the Portal.

The information contained in this guidance applies to financial entities in scope of DORA, where the Central Bank is the designated competent authority, and should be read in combination with other relevant documentation and legislative texts concerning DORA Registers of Information.

In this guidance, examples of successful and unsuccessful submission of Registers of Information on the Portal are provided.

It is the responsibility of the financial entity's administrator to manage user access on the Portal. For users not familiar with the Portal, information and related guidance documents are available on the Central Bank's website here.

2 System Information

2.1 Inactivity

A Portal login session times out after eight hours of inactivity, at which point the user is required to login again. When the user is finished using the Portal, it is recommended that the user exits the system using the logout link under "Account Settings" in the top right corner of the screen.

2.2 Internet Browser

As explained in the <u>Browser Support Section</u> of the Portal webpage, the Portal should work with any modern, standards-based browser. The Central Bank does not require, or recommend, any particular browser as the Central Bank's websites and public-facing applications support the current versions of all major browsers. Testing is concentrated on the most commonly used browsers. At this time, this specifically includes Chrome and Edge.

2.3 Logging On

The Getting Started Help section of the Portal's webpage provides information on how to register for and login to the Portal.

2.4 Uploading Attachments

The type of document that may be uploaded is described in the "Messaging" section of the Portal.

Please note the system supports up to a maximum size of 30MB per file uploaded.

2.5 User Permissions

Please note users must have sufficient permissions to submit/finalise and sign off a Register of Information.

If you are currently a portal user and do not have the relevant permissions, please contact your institution's Portal administrator.

You can reach out to your institution's Portal administrator off-system or via the functionality in the Portal, which allows you to request a change of permissions on the system, as follows:

How do I request a change to my permissions?

Go to "Portal Administration" > "Manage Users" > Select the relevant user > Select "Actions" > "Manage Permissions".



Scroll to the bottom of the page and locate "ONR Returns". From this section, "None", "Viewer", "Editor", "Verifier" or "Editor & Verifier" access can be chosen.



- None Cannot see the return.
- Viewer Can see the return but cannot upload, finalise or sign off.
- Editor Can upload and finalise but cannot sign off.
- **Verifier** Cannot upload or finalise, can sign off.
- Editor & Verifier Can upload, finalise and sign off but cannot sign off a return they finalised.

If you cannot see the Returns tab, please note the below:

Portal administrators should activate their permissions via the Portal administrator tab. The Portal administrator receives automatic access to all return/report types, however in the scenario where the "View/Edit" option is not displayed, the following action should be taken:

Go to "Portal Administration" > "Manage Users" > Select the relevant user > Select "Actions" > "Manage Permissions" > Scroll to the bottom of the permission page and select "Save". Once saved, best practice is to clear the browser history and to log in again. The "Returns" menu item should then appear.

2.6 Messaging

On the Portal, the user/delegate from your financial entity should receive a reminder message to submit the Register of Information. Please note if the message is not received there is still an obligation for the financial entity to submit the Register of Information annually. Registers of Information should be submitted via the Portal during the window specified on the Central Bank's DORA Reporting Registers of Information page.

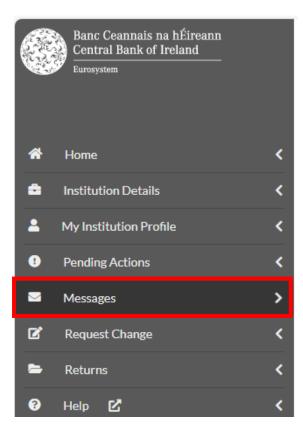
"Dear Sir, Madam,

Please note that the {ReturnTypeName}, for the institution {InstitutionIdentifier}, for the reporting period {ReportingDate} must be submitted via the Central Bank of Ireland Portal by {DueDate}.

Regards,

The Central Bank of Ireland"

The above is a sample of an automatically generated email from the Portal, which can be found in the "messages" drop down menu highlighted below.



When you open the message from the Central Bank, an acknowledgement request will pop up.

By clicking "Ok", an acknowledgement will be sent to the Central Bank. Do not reply to this message as this will not be monitored. Any further queries should be sent through the usual support channels.

Once you have received a request from the Central Bank through the Portal for a submission, you can navigate to the "Returns" View/Edit Returns tab to submit your Register of Information.

3 How to submit a Register of Information

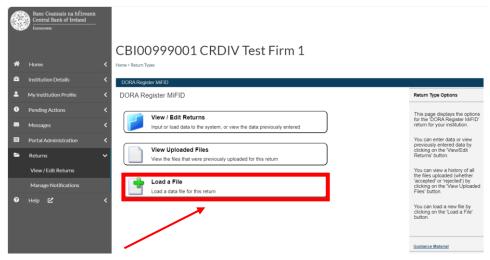
3.1 Navigating the DORA Registers Load File Screen

To submit a Register of Information, the user logs in to the Portal with their user details, navigates to the "Returns" tab and clicks "View / Edit Returns". The return is located under the "DORA Registers" heading.

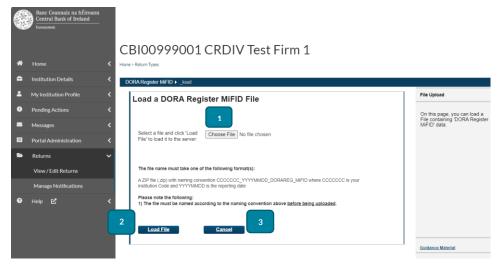


You will only see the DORA Register applicable to your financial entity.

Click on the hyperlink for the relevant DORA Register. This opens the return landing page where the user can load a file or View/Edit previously uploaded returns.



To load a file click on "Load a File".



The "Load a File screen" allows the user to submit a Register of Information return to the Central Bank.

The elements of the Load a File screen above are as follows:

1. Choose File

Pressing the "Choose File" button opens the user's file explorer. From here, the relevant Register of Information file can be selected.

2. Load File

Where the selected file adheres to the naming conventions and appears beside "Choose File," click on the "Load File" button to load the file.

3. Cancel

Clicking on the "Cancel" button returns the user to the Register of Information Portal screen.

3.2 Naming Convention for the Register of Information

The register filename must adhere to the following naming convention:

CCCCCC_YYYYMMDD_CBIREGISTERNAME

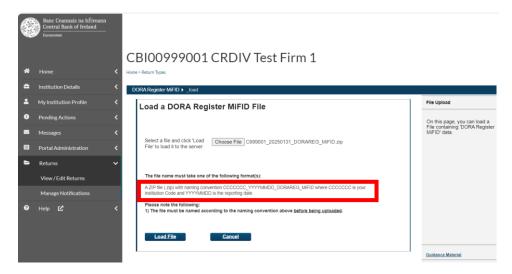
Where:

CCCCCC - is the financial entity's C code.

(Note - this is the numerical section of the financial entity's number preceded by "C" and NOT the institution number. Where the institution number is CBI0012345, the C Code will be C12345).

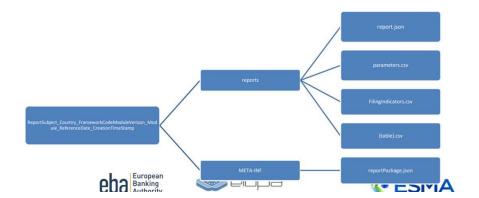
YYYYMMDD – is the reporting date in the format year, month, day.

CBIREGISTERNAME - is the name of the register as outlined in this guide and as displayed on screen when you are loading a return.

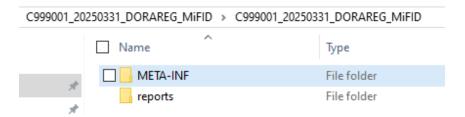


3.3 Correct Format

This section is based on guidance which is linked on the Central Bank's website here. Particularly useful is the EBA site in the section on "Preparations for Official Reporting of Registers" which includes slides on how the file should look, including:



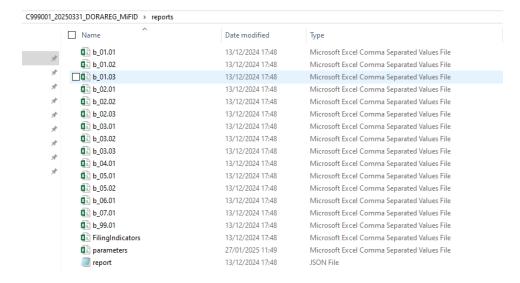
This is what the compiled file should look like (example with a test firm C#):



The META-INF folder should then contain:



And the report folder would look like the following:



3.4 Common Issues with the Register of Information Format

Ensure you are using the current taxonomy 4.0 schema in the report.json file.

http://www.eba.europa.eu/eu/fr/xbrl/crr/fws/dora/4.0/mod/do ra.json

- Ensure there are **no spaces** in the filename.
- Ensure the date format within the files are correct i.e. YYYY-MM-DD.
- Ensure you have **LEI and not CNUM** in the parameters.CSV file.
- Ensure you have rs: in front of the LEI number in the parameters.CSV file.
- Ensure you have '.CON' or '.IND' after your LEI code in the parameters file.

entityID	rs:1234567A1XYZSTUV6789 <mark>.IND</mark>
Or	
entityID	rs:1234567A1XYZSTUV6789 <mark>.CON</mark>

Ensure there are no €£\$ symbols in the csv files.

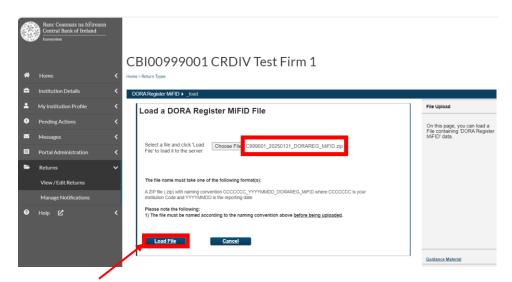
3.5 Submission of a Register of Information on the Portal

There is a three-step process for submitting the Register of Information via the Portal as outlined below. Please note the same user cannot finalise and sign off the upload.

3.5.1 Upload Register of Information

The uploading user must be assigned "Editor Access" by their Portal Administrator.

When the register file is chosen from the file explorer, it appears on screen as below.

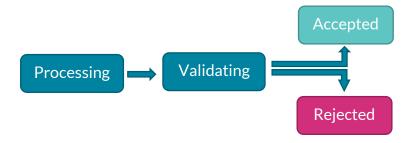


Select "Load File".

The File Upload Status screen appears as below.



The initial "File Status" appears as "Processing". The status progresses through the following stages:



Progressing through these stages is automatic and can be quick, to the extent that they may only appear briefly on screen.

Depending on website traffic volumes, the majority of files should be processed within five minutes.



Clicking on "Refresh Page" updates the user on the current file status.

Upon the successful completion of the uploading process, the file status appears as "Accepted" and the processed date displayed.



The user also receives a confirmation email detailing the outcome of the submission. This email is sent to the address that the user has registered with the Portal, and is only sent to the user that has submitted the return. An example of such a confirmation email is set out below.

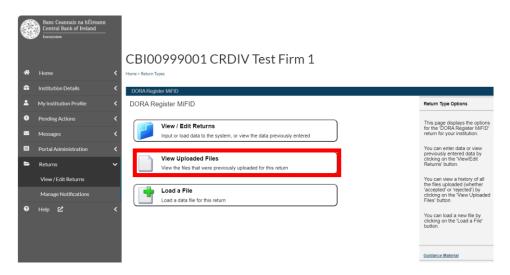
"The file 'C999001_20250331_DORAREG_MiFID.zip' has been processed. This is an automatically generated message. Please do not reply to this email."



On the Portal upload screen, clicking on "Back", redirects the user to the "View Uploaded Files" screen, where the user can view all previously uploaded files, the submission type, who uploaded the file, date of upload and the status. A sample of this information is set out below.



The user can also access this screen from the main DORA Register Returns page by click on the "View Uploaded Files" button.



In some instances, the user will receive a confirmation email detailing the outcome of the submission noting that the file has been accepted with warnings. An example of such a confirmation email is set out below.

The file 'C999001 20250331 DORAREG MiFID.zip' has been processed. This file has been accepted with warnings.

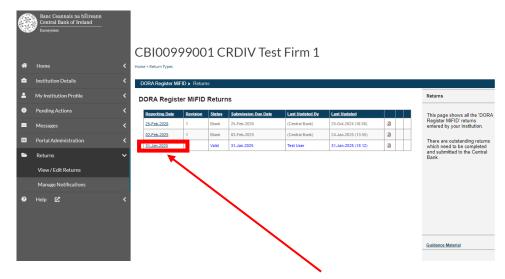
This is an automatically generated message. Please do not reply to this email.

If the file is processed with warnings, the user can view the warning by completing the following steps:

Go to "Returns" > "View/Edit Returns" > select the DORA Register Return > Select "View Uploaded Files" > Select the file.

3.5.2 Finalise Register of Information

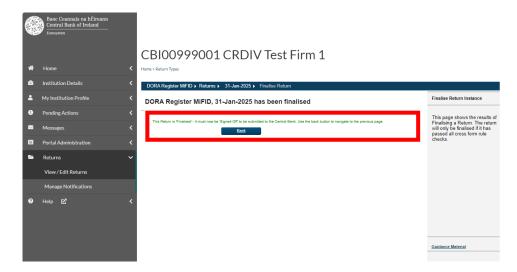
The same user, with editor access, must finalise the uploaded Register of Information by clicking on the "View/Edit Returns" button.



To finalise, the user must click on the "reporting date" link for the register and then, on the next screen, click "Finalise".



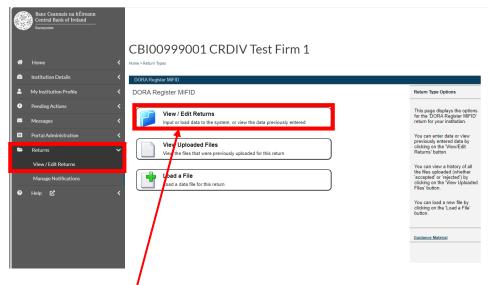
The following screen appears with a message "This Return is 'Finalised' - it must now be 'Signed-Off' to be submitted to the Central Bank. Use the back button to navigate to the previous page." Please note the same user cannot finalise and sign off a Register of Return.



3.5.3 Sign off Register of Information

A different user must be assigned "Verifier" access by the financial entity's portal administrator.

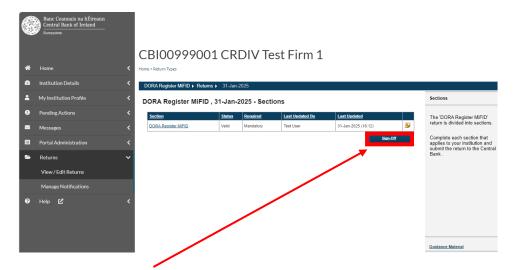
Navigate to Returns > View/Edit Returns > DORA Registers > Select the register for your financial entity.



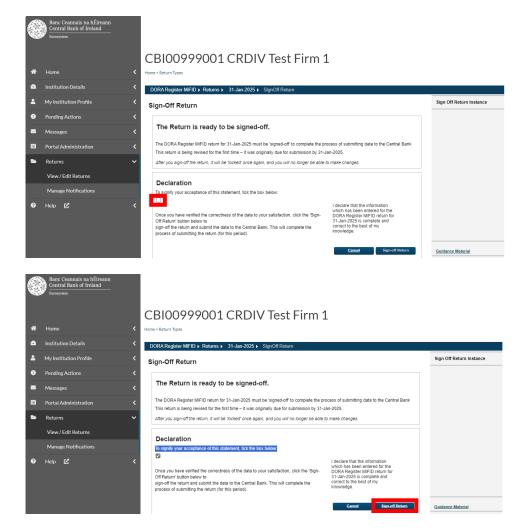
Click on the "View/Edit Returns" button.



To sign off, the user clicks on the reporting date link for the register that displays a status of "Finalised".



The user clicks "Sign-Off". Once the Declaration Screen opens, the user clicks the checkbox to signify acceptance of the statement and then select "sign-off return".

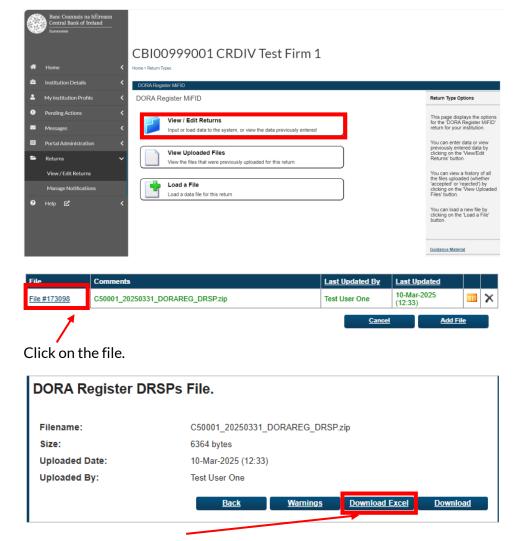


The user will receive a confirmation email detailing the outcome of the sign off. This email is sent to the address that the user has registered with the Portal, and is only sent to the user that has submitted the return. An example of such a confirmation email is set out below.



4 Viewing a previously submitted Register of Information on the Portal.

Go to "Returns" > "View/Edit Returns" > select the DORA Register Return > Select "View/Edit Return" > Select the file



Click on "Download Excel" to download the Register of Information.

5 EBA Feedback Files

Upon receipt of the Register of Information via the Portal, it is transmitted to the EBA by the Central Bank. Once EBA validation checks have been completed, a feedback file will be sent to the Central Bank supervisor. Please note that if there are further changes required, the Central Bank supervisor will send the feedback results to the financial entity via the Portal Secure Messaging service for the financial entity to make any necessary changes.

6 EBA Feedback - Data Quality Issues to be addressed

Please note that it has been flagged in the past 24 hours that there are some errors with some of the EBA validations. The rules mistakenly flag "empty" or "Null" values, even though these values are permitted by the ITS and the DPM. We understand that their IT team are working to resolve these. However, in the meantime, please be aware of some incorrect errors which may be a cause of confusion as follows:

The rules mistakenly flag "empty" or "Null" values, even though these values are permitted by the ITS and the DPM. Please refer to the below table, which includes the template, column position, and rule code for examples of the errors which may be incorrect:

Template	Column Code	Rule Code	Message
b0202	c0090	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0202	c0100	331	Integer type metric must be reported with an
			integer
b0202	c0110	331	Integer type metric must be reported with an
			integer
b0202	c0120	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0202	c0140	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy

b0202	c0170	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0202	c0180	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0501	c0090	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0501	c0100	305	Numeric fact must not be reported with a string
			value
b0501	c0120	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy
b0701	c0060	503	Extensible main property and explicit key
			dimension must only be reported with one of
			the restricted value of a hierarchy

In order to address the validation and data quality issues identified in the EBA feedback file, we are directing you to the EBA site for preparation of the register.

The EBA has changed the guidance/validation on certain files as at 15 April 2025, so some files, which would have passed the Central Bank of Ireland validation will not pass EBA validation.

This includes changes to the validation of the **filing indicators** file. The EBA validation now requires that all 15 templates are included in this file as true, even if the template file is not included in the package or is included, but blank.

For this and other errors, we direct you to the below:

Slides on common errors from EBA testing last week: <u>slides on</u> common issues

In these slides, the EBA also give the format of their validation errors and some examples of common errors in the form below, giving the template code, the row code, the column code, the error code, the error message and the value which prompted the error:

```
"detailedFeedback": [
"templateCode, rowCode, columnCode, ruleCode, message, offendingValue",
```

The EBA may not validate every entry in the package in the first iteration, therefore there might be a couple of rounds of feedback files for correction.

The EBA preparation site, as well as the link to the slides above, has multiple helpful links to the rules and guidance, which will help you correct your register, including but not limited to:

- EBA sample files useful for guidance on, e.g. what the reporting package should look like, how the date format should look (YYYY-MM-DD throughout all files). It should also be noted that they need to view the files in Notepad/ Notepad++ in order for the format to be correct.
- Answers/ clarity on many questions as to what to include in the register - the Implementing Technical Standards (ITS) and the EBA FAQ. You can use CTRL+F to search the FAQ for specific templates or fields (E.g.B_01.03) in these FAQ to find out if there are certain peculiarities around a specific template or field.
- What fields are mandatory/ format of those fields see <u>EBA data</u> model and the Implementing Technical Standards (ITS) - please note that there are errors in the EBA guidance in that the data model says some fields are nullable (i.e. can be left blank) - but where these fields are noted as mandatory in the ITS, or key fields in the annotated template, they need to be filled in.
- What the correct columns are as well as what should be included in columns with drop down fields - see EBA annotated template.

Firms should save the feedback file, received from their supervisor via the Central Bank of Ireland Portal, locally, with a shortened filename in order to avoid any issues around long filepath. The first Feedback File is likely to be an NOK (Feedback Failed) file and the second file-type will be a results (RES) file with details on the LEI and EU-ID checks.

Within the feedback file, there is a detailed feedback file, e.g.:



This feedback file contains the validation errors which you will need to work through, row-by-row, and update your register accordingly,

before re-saving your reporting package, unlocking your return on the Portal and submitting your updated return.

Once you have corrected the errors identified in the EBA feedback file. you will need to unlock your register return and submit your updated Register package through the CBI portal.

When you receive the EBA results (RES) feedback file, if the only issues identified in this file relate to third party providers for whom you don't have an LEI or EU-ID and for whom you have entered another identifier (as described in EBA FAQ 39), the EBA have advised in their FAQ that this is permitted for 2025, even though it is still identified as a Data Quality (DQ) issue.

Therefore you can let your supervisor know that you're only remaining DQ issues are related to those providers for whom you do not have an LEI or EU-ID and that all other DQ issues have been remediated and your submission is as complete as possible for 2025.

You should continue to push your providers to ensure they have provided a valid LEI or EU-ID in time for your next register submission.

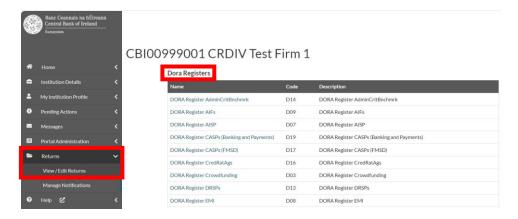
7 Making Changes to a Register of Information

Before requesting for an auto unlock the user must have the required permissions.

Go to "Portal Administration" > "Manage Users" > Select the relevant user > Select "Actions" > "Manage Permissions" > Scroll to "Request Changes" > "Unlock Request" and tick the box to assigned the permission to the user. Select "Save". Once saved, best practice is to clear the browser history and to log in again.

If there are changes required after signing off the Register of Information, a user with verifier access can request for an auto unlock of the return.

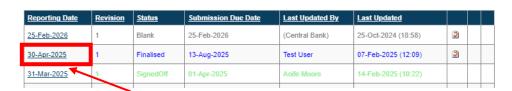
The user logs in to the Portal with their user details, navigates to the "Returns" tab and clicks "View / Edit Returns". The return is located under the "DORA Registers" heading.



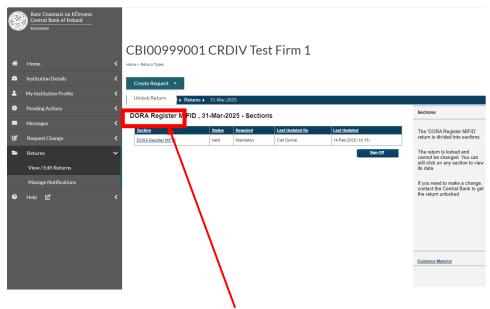
You will only see the DORA Register applicable to your financial entity.

Click on the hyperlink for the DORA Register.

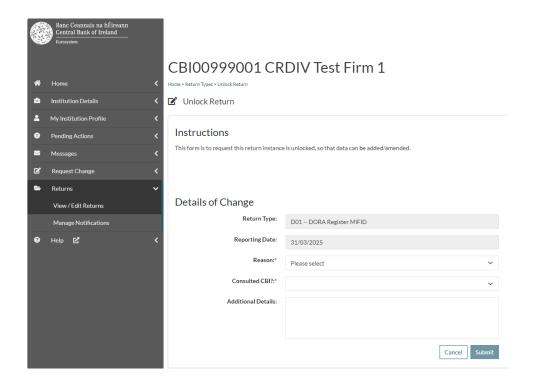




Click on the "reporting date" for the Register of Information that has been already signed off.



Select "Create Request". A list of the available requests for your financial entity that you have permission to view/create will be displayed. If you cannot see the "Create Request" change menu item or a specific request change option you should contact your Portal Administrator.



Complete the form. Instructions are displayed on the top of the screen and mandatory fields are denoted by a red asterisk. The mandatory fields vary depending on the specific request.

Click "Submit". The system will automatically unlock the Register of Information and you will be able to submit a new one. Please see section 5.3 above for more information on the submission process.

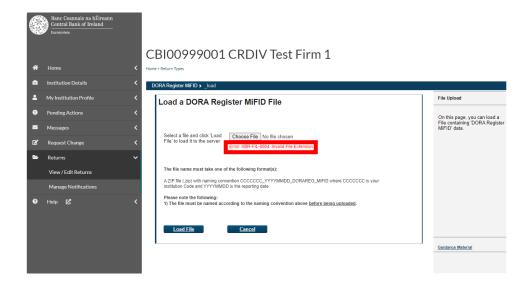
8 Common Validation Errors

The examples shown thus far in the guide regarding the submission of Registers of Information on the Portal relate to successful submissions.

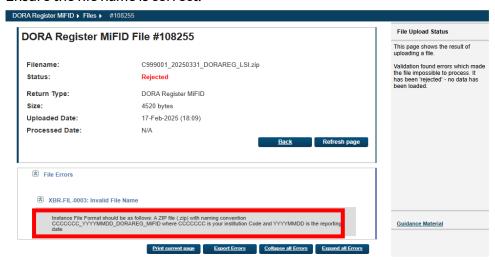
However, there may be instances where the submission of a Register of Information is rejected, or the user encounters errors when trying to upload a return on the Portal.

In order to avoid common validations errors, it is important to note the following:

1. Ensure the file type used is a 'plain-csv' (xBRL OIM-CSV) file in accordance with EBA taxonomy 4.0. Also ensure that the name of the ZIP file (.zip) file adheres to the naming convention.



2. Ensure the file name is correct.



3. Ensure that the Financial Entity's LEI is in upper case.



4. Ensure the LEI is correct.



5. Ensure that the same return for the same reporting date is not already signed off.



6. Ensure the file is not double zipped.



7. Ensure the C Code is correct.



8. Ensure the reporting date is correct.



9. Ensure the LEI is correctly populated in the parameters file.



10. Ensure the file has a parameters file.



11. Ensure the files are not empty.

CBI00999001 CRDIV Test Firm 1



12. Ensure the file has a FilingIndicators.csv file.



13. Ensure the file has a JSON file.

CBI00999001 CRDIV Test Firm 1



