



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Fitness and Probity Review

2026 Report on Implementation of Recommendations

June 2026

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1. Background

Following an [implementation update in April 2025](#), this report provides a further update on the progress made implementing the recommendations contained in the [Fitness and Probity Gatekeeping Review](#) (the Review) conducted by Mr Andrea Enria in 2024.

Central Bank of Ireland is now pleased to confirm the successful implementation of all twelve recommendations, which have been embedded into our processes and our approach. While this marks our final update on implementation, the Central Bank remains committed to continuous improvement and ensuring we sustain and build on the progress made in addressing the Review.

2. Implementation of Recommendations

Building on the progress outlined in the April 2025 Implementation Report, we have moved from enablement to operational embedding across the three key review areas:

Clarity of Supervisory Expectations

- Consolidated fragmented guidance into streamlined, user-friendly materials, eliminated redundant content, and refreshed our website to improve navigation.
- Following public consultation, published enhanced [Fitness and Probity \(F&P\) Standards Guidance](#) which provides greater certainty on Central Bank expectations for senior roles.

Internal Governance

- Established the Fitness and Probity Unit (1 January 2025) to centralise gatekeeping responsibilities across all sectors.
- Created the Gatekeeping Decisions Committee (1 March 2025), chaired by the Deputy Governor, to provide senior leadership and independence in refusal decisions.

Fairness, Efficiency and Transparency

- Published the [Fitness and Probity Gatekeeping Process Manual](#) with clear details for all parties on what to expect as part of the assessment process.
- Delivered consistent performance: F&P assessments complete for 97% of all applications within 90 days; average approval time of 50 calendar days.
- Conducted extensive industry engagement with positive feedback.
- Established a [Complaints Procedure](#) for fitness and probity assessments with an independent third-party reviewer attached.

3. Our ongoing Commitment

Implementation of these recommendations is not the end of our work - it is the foundation. We remain committed to:

- Continuous refinement of our processes to ensure predictable and proportionate outcomes,
- Embedding of a quality assurance and effectiveness mindset, and
- Facilitating industry engagement and channels for stakeholder feedback.

An important focus for 2026, will be the output from our review of roles requiring pre-approval. We are targeting the end of the year to outline the proposed changes to this important aspect of the F&P regime.

4. Conclusion

Central Bank of Ireland has successfully implemented all twelve recommendations from the Review. The establishment of the Fitness and Probity Unit and the Gatekeeping Decisions Committee have significantly enhanced the governance and decision-making

framework, ensuring the fitness and probity gatekeeping process operates with high levels of professionalism, fairness and consistency.

The performance metrics for 2025 demonstrate applications are being processed efficiently whilst maintaining a high standard of consistent review.

Looking forward, the Central Bank remains committed to sustaining the recommendations, principles and spirit of the Review. We will continue to ensure the fitness and probity gatekeeping framework is efficient and robust, supporting supervisory judgement whilst delivering a fair and transparent process.

In keeping with the format of the 2025 Implementation Report, we have also included in the **Appendix** a table summarising for ease of reference, the review recommendations and implementation details.

For further information, please contact the Fitness and Probity Unit at fitnessandprobity@centralbank.ie.

Appendix – Review Recommendations and Implementation

Review Recommendation	Focus	Implementation Output
1	Fostering industry role in fitness and probity gatekeeping - greater clarity and guidance to industry on the important role of regulated entities in the gatekeeper phase	<p>The Central Bank has implemented a multi-faceted approach:</p> <ul style="list-style-type: none"> • Published a Fitness and Probity Gatekeeper Process Manual which emphasises roles and expectations, • Established the Fitness and Probity Unit with responsibility for industry stakeholder engagement, • Hosted Q2 2025 industry on-site event attended by 55 cross-sector representatives, • Delivered Q4 2025 online workshops with over 600 attendees covering portal navigation and new consolidated F&P Guidance, • Provided ongoing ad hoc sectoral engagement throughout 2025, • Issued external surveys directly to industry to identify where gaps might exist - external feedback from 2025 engagement was positive, with industry valuing transparent discussions and practical guidance.
2	Enhance Fitness and Probity Standards and guidance issued by the Central Bank	<ul style="list-style-type: none"> • Consolidated and updated Fitness and Probity Guidance on the Standards was publicly consulted upon during H1 2025. • Guidance published in November 2025, addresses feedback that the Central Bank should provide greater certainty on

Review Recommendation	Focus	Implementation Output
		<p>expectations for persons performing key roles at senior levels and was reviewed in consideration of complementary powers to ensure they operate in an integrated manner.</p> <ul style="list-style-type: none"> • Relevant F&P material will be updated following our review of the PCF list in 2026 and 2027 SEAR review to ensure relevance, integration and ease of reference for industry.
3	Governance - Establish a single Fitness and Probity Unit and review of number of PCF roles	<p>The Fitness and Probity Unit was established on 1 January 2025 and has successfully:</p> <ul style="list-style-type: none"> • Centralised fitness and probity gatekeeping responsibilities across all sectors, • Enhanced consistency of assessments, • Streamlined operations and ensured a cohesive assessment framework, • Maintained high processing standards throughout 2025. • PCF list reconsidered and subject to consultation in 2025. Targeting the end of the year (2026) to outline proposed changes.
4	Decision making	<p>The Gatekeeping Decisions Committee was established on 1 March 2025 and has:</p> <ul style="list-style-type: none"> • Provided senior leadership and independence in final decision-making on cases of potential refusal; and is

Review Recommendation	Focus	Implementation Output
		<ul style="list-style-type: none"> • Chaired by Deputy Governor McMunn with seven additional members at Head of Division level or above.
5	Communication and IT Platform - stakeholder engagement	<ul style="list-style-type: none"> • Annual information session on the practicalities of the F&P process - part of the F&P Unit's annual workplan – last session was in Q4 2025 (as above at recommendation 1) - next session scheduled for Q3 2026. • Active industry engagement has fostered transparency and created a feedback channel as outlined above – see above as part of our response to recommendation 1. • Direct feedback from applicants through post-application surveys has proved particularly useful – and overall external industry feedback has been generally positive.
6, 7 & 8	Interview Stage - and withdrawals - Gatekeeping assessment improvements	<p>The Fitness and Probity Gatekeeping Process Manual clearly articulates the Central Bank's approach to interviews and withdrawals incorporating all recommendations of the Enria review, including:</p> <ul style="list-style-type: none"> • Detailed invitations to interview, • Commitment to 90-minute interviews, • Provision of feedback after interviews and withdrawals.
9	Management information	<ul style="list-style-type: none"> • Enhanced management information and statistics is shared externally through the

Review Recommendation	Focus	Implementation Output
		<p>annual Authorisations and Gatekeeping Report.</p> <ul style="list-style-type: none"> • The 2025 report includes further insights and information consistent with the Review’s recommendations. • Process improvements have been implemented without compromising on consistent performance - F&P Assessments completed on 97% of applications within 90 days; average approval time of 50 calendar days (52 in 2024).
10	Quality assurance	<ul style="list-style-type: none"> • Process established for 2026 overseen by an external advisor. • Periodic deep dives by the F&P Unit focused on process adherence and to identify opportunities for improvements/refinements.
11	Complaints	<ul style="list-style-type: none"> • Established complaints procedure for fitness and probity gatekeeping assessment. • To date, no fitness and probity complaints have been made through the procedure.
12	Comprehensive Training programme for F&P gatekeeping process	<ul style="list-style-type: none"> • Training programme delivered to staff with a focus on interviews and decision making.



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