aberdeen

A guide to completion of the Irish Trust Register for UK trustees

For UK adviser use only.

aberdeenadviser.com

Contents

Introduction	3
Which trusts need to register?	4
Why registration is important	5
Who can register a UK trust on the CRBOT?	6
Information required to complete registration	7
The registration process - in summary	8
The registration process - step-by-step guide	9
Dealing with the bond provider	13
Maintaining the register	14
Appendix 1: Access request form	15
Appendix 2: Presenter form	16

Introduction

As part of the EU 5th Money Laundering Directive, UK trusts which hold Irish-based offshore bonds must register the trust on both the UK and Irish trust registers. The Irish Central Register of Beneficial Ownership of Trusts (CRBOT) must be completed if a UK trust has a business relationship in Ireland.

The CRBOT makes no exception for a trust which has been registered in the UK on the Trustee Registration Service (TRS) because the UK is no longer an EU member state. That means dual registration will be necessary.

The requirement to register in Ireland has existed since 24 October 2021. However, the Irish Revenue recognised that there were genuine problems for UK trustees updating the CRBOT system and registration for UK trustees was suspended until a solution could be found.

The suspension for UK trustees ended on 5 March 2025 and an updated CRBOT registration service is now available. Trustees have six months from taking out an Irish offshore bond to register the trust with the Irish Revenue. For new trusts established with a bond after 5 March 2025, that will be six months from the date of the trust. Existing trusts with an Irish offshore bond which was taken out more than six months ago have an immediate requirement to register.

Which trusts need to register?

Irish registration is required where a UK express trust holds an Irish offshore bond or capital redemption policy. An express trust is typically a trust established by trust deed or by a written declaration.

It includes bare trusts, flexible trusts and discretionary trusts as well as our packaged estate planning solutions such as Discounted Gift Plans and Loan Plans.

Trusts created in a Will on the death of the testator only need to be registered once the administration period for the estate has been completed and the trustees are in possession of an Irish bond transferred from the estate, or have purchased a new Irish bond from the cash or other assets transferred.

There are currently certain trusts excluded from registering on the TRS including;

- personal injury trusts
- disabled trusts
- bereaved minor's trust[1]
- 18-25 trusts.

These are not excluded from Irish registration.

[1] A bereaved minor's trust which arises under the law of intestacy is not an express trust and therefore is not required to register.

Image: Cliffs of Moher, County Clare.

Why registration is important

If a UK trust fails to register, in addition to potential fines and penalties, it may not be possible for the trustees to access the bond until registration has been successfully completed.

Irish bond providers are required under the legislation to check that the trust details they hold on their records match the details held on the CRBOT. This discrepancy check is required where the trustees wish to do the following:

- full or part surrender of the bond
- commencing regular withdrawals
- incrementing the bond
- assignment
- changing the trustees
- changing the beneficiaries.

Who can register a UK trust on the CRBOT?

The trustees are responsible for registering their trust on the CRBOT. However, they can delegate that responsibility and allow others to complete the registration on their behalf. Unlike the UK TRS where only registered UK tax agents can complete the TRS on behalf of the trust, the CRBOT reporting can be delegated to anyone, including UK financial advisers.

Information required to complete registration

The Irish CRBOT registration process is similar to the UK TRS, in that it requires information about the settlors of the trust, the appointed trustees, and beneficiaries. However, the Irish Revenue also requires Anti-Money Laundering (AML) evidence (e.g. copy of passport) to be uploaded onto their register. Where an individual falls within multiple sections, for example trustee and beneficiary, their details must be added in both.

Presenter

This is the person completing the registration. This could be one of the trustees or they could ask someone to register on their behalf. They will need to provide name, address and telephone number only. Presenters do not provide proof of identity unless they are also a settlor, trustee or beneficiary.

Settlors

These are the persons who created the trust or have subsequently added funds to the trust. Where there are joint settlors, each settlor's details will need to be added to the beneficial ownership form on the natural persons tab, and the relevant ID documents uploaded.

Trustees

Details of all the current trustees will need to be added to the beneficial ownership form and ID documents uploaded. If there are corporate trustees, the details of the trust company will need to be added to the company tab of the beneficial ownership form.

Beneficiaries

Beneficiary details will need to be individually recorded, and ID documents provided where they have a vested interest. That applies where a specific beneficiary is entitled to either the income or capital of the trust. This will be the case for the named beneficiaries in our absolute or flexible trusts.

Where beneficiaries are identified by class such as the potential beneficiaries in our discretionary and flexible trusts, only the details of each class need to be entered. However, when the trustees appoint trust income or capital to a potential beneficiary, the beneficiary's details will need to be added prior to the appointment being made.

Protectors

Where a trust includes a protector, someone who oversees, monitors, and controls the administration of the trust by the trustees, their details will need to be added, and ID documents uploaded. Our suite of trusts does not include protectors.

Proof of identification

Most UK resident individuals named on the beneficial ownership form will not have an Irish Personal Publication Service (PPS) number which is the equivalent to a UK National Insurance number. Therefore, proof of their identity will need to be uploaded too.

Acceptable forms of ID include,

- copy/photo of passport
- copy/photo of a recent Government letter (HMRC, DWP etc.) containing their name and National Insurance number
- where a minor child has neither of the above forms of ID, a copy of their birth certificate can be accepted.

The following file types can be used to upload ID documents: TIF, TIFF, PDF, DOC, DOCX, JPG and JPEG. This means it is possible to upload a photograph of a passport to identify a beneficial owner.

The registration process – in summary

01	Input the name of the trust and the type of trust, their or their company address and contact details.
02	Email issued with verfication code to access the CRBOT.
03	Download the beneficial ownership details template and a presenter form if completing on behalf of the trustees.
04	Complete beneficial owners' details for settlors, trustees and beneficiaries.
05	Upload the completed beneficial ownership details form, presenter form (if required), and ID documents for the beneficial owners.
06	Once all required forms and ID uploaded correctly, a trust registration number will be provided.

The registration process – step-by-step guide

Step 1

Request access to the register

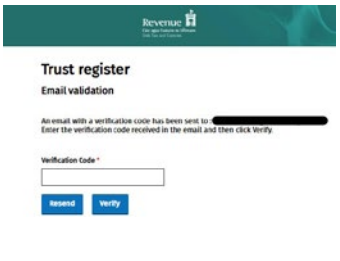
UK trustees are generally unable to access the Irish Revenue Online Service (ROS) to register their trust on the CRBOT. A workaround has been put in place to allow non-Irish resident trusts to register.

UK trustees, or presenters on their behalf, should register their trust using this **link.**

Once the initial details have been submitted, a verification code will be emailed.

1

2



Step 2

Email verification

Input the verification code to access the trust register.

Step 3

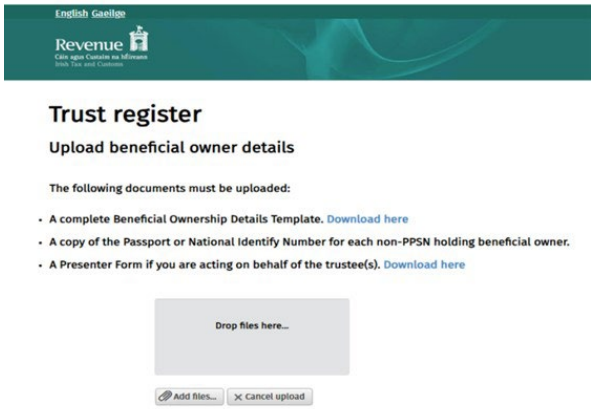
Download the beneficial ownership details template and presenter form (if required)

This is the Irish Trust Register for UK trustees. This is the screen where the beneficial ownership details template and presenter form can be downloaded.

The beneficial ownership details template is where all the trust details are captured and needs to be uploaded when fully completed.

The **presenter form** (see **Appendix 2**) is a letter of authority from the trustees to allow someone to complete the register on their behalf.

3

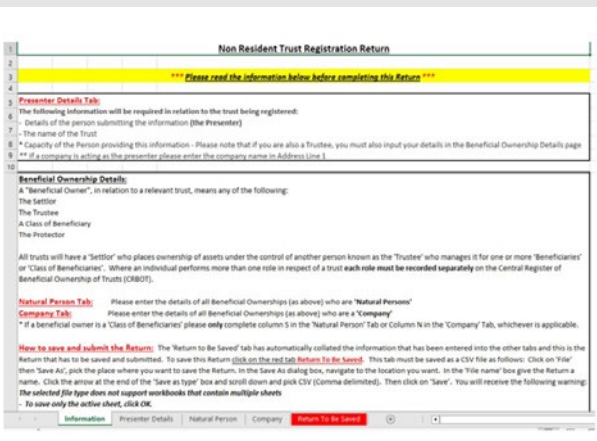


Step 4

Complete the beneficial ownership details template

Once the verification step has been successfully completed, **the beneficial ownership details template** can be downloaded. This excel spreadsheet is used to capture all the details for the settlors, trustees and beneficiaries.

4



Completing the beneficial ownership template

The form has four tabs.

1. **Information tab** – This provides details of how the form should be saved and submitted. It is important that these instructions are followed to avoid errors when the form is uploaded.
2. **Presenter details tab** – This tab captures the name, address and phone number of the person completing the form. It also requires the capacity in which they are acting either as trustee, presenter on behalf of the trustees, or an officer/employee of the trust.

   Finally, it asks the name and type of trust which includes a dropdown box with a number of trust types including pension & life assurance scheme, estate planning & personal wealth, charitable trusts etc.
3. **Natural persons tab** – This is used to capture details where the beneficial owner is an individual rather than a company. This is where the majority of the trust details are captured.

   There are six beneficial owner types whose details will need to be recorded on this tab. These are settlor, trustee, beneficiary, class of beneficiary, protector and other person exercising effective control. If an individual falls within more than one of these types of beneficial owner, for example trustee and beneficiary, they will need to complete a separate line on the spreadsheet for each one.

   This tab captures name, address, date of birth, nationality and country of residence. If the individual does not have an Irish PPS number (equivalent to a UK National Insurance number) they will also need to include identification. The form will capture the type of identification used and its number.

   There are fields to record the date when the individual first became a beneficial owner, and the date on which any beneficial ownership ceased. There is also a free text field to describe the nature and extent of interest or control, for example joint settlor of a discretionary trust.

   The final column is for classes of beneficiary only and is to describe the class of beneficiary, such as the child and grandchildren of the settlor. There is a limit of 70 characters for this column which may be considerably less than the wording used to describe the class in the trust deed, so trustees must try to summarise the class as clearly as possible within the character count. Exceeding the maximum character length in any of the fields will mean the form cannot be successfully uploaded.
4. **Company tab** – This tab is to be used if any one of the beneficial owners is a company, for example where a trust company has been named as trustee. This follows a very similar structure to the fields in the natural persons tab. The key difference is that it asks for filing reference if the company has previously been registered on the CRBOT.

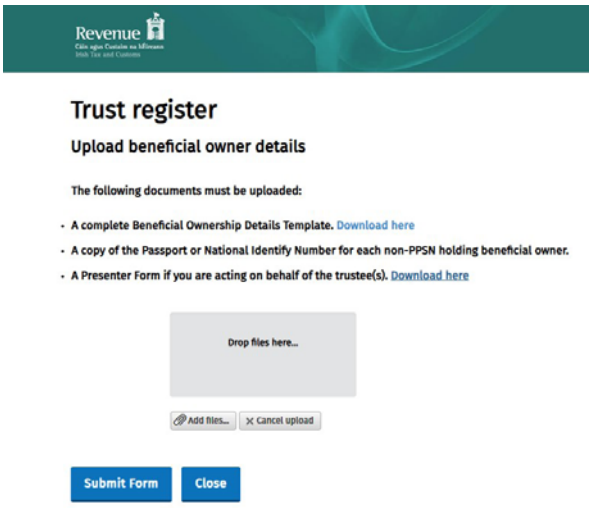
To save the completed form to be uploaded, use the red 'Return to be saved' tab. The file MUST be saved as. CSV (Comma delimited) file type.

Tip – Save the file somewhere safe and where it can easily be found as it may be needed in the future if there are any changes in the beneficial ownership.

Step 5 - Upload beneficial owner details and proof of ID

Once the beneficial ownership details form has been completed and saved, the final step is to upload it to the Irish Trust Register along with copies or photos of ID documents for each of the named beneficial owners.

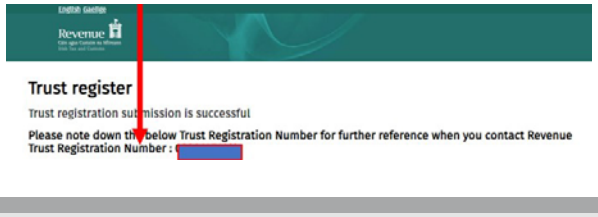
5



Step 6 – Trust registration number provided

It is vital to make a note of the trust registration number as it is not emailed or posted out to the applicant. The offshore bond provider will require this number as proof of registration along with an access request form (see **Appendix 1**) to complete their discrepancy checking requirements.

6



Aberdeen trust range

At a glance – who needs to be individually named and identity checked

Trust	Who needs to be identity checked	Identified by class. No ID documents required
Gift Plan – absolute trust	Settlor(s) Trustees Beneficiaries	
Gift Plan – flexible trust	Settlor(s) Trustees Main Beneficiaries	Potential beneficiaries
Gift Plan – discretionary trust	Settlor(s) Trustees	Potential beneficiaries
Loan Plan – absolute trust	Settlor(s) Trustees Beneficiaries	
Loan Plan – flexible trust	Settlor(s) Trustees Main Beneficiaries	Potential beneficiaries
Loan Plan – discretionary trust	Settlor(s) Trustees	Potential beneficiaries
Discounted Gift Plan – absolute trust	Settlor(s) Trustees Beneficiaries	
Discounted Gift Plan – flexible trust	Settlor(s) Trustees Main Beneficiaries	Potential beneficiaries
Discounted Gift Plan – discretionary trust	Settlor(s) Trustees	Potential beneficiaries

Potential beneficiaries do not need to be individually named, and ID is not required during registration. However, if the trustees appoint benefits to them, including by assignment or a deed of appointment to benefit (AD7), this cannot take place until the register has been updated with their details and ID uploaded.

Therefore, it can speed up the claims/assignment process if potential beneficiaries are individually registered if it's expected that they will receive a benefit in the future.

Dealing with the bond provider

Irish bond providers are required under the legislation to check that the trust details they hold on their records match the details held on the CRBOT. Discrepancy checking is required in the following circumstances:

- full or part surrenders
- commencing regular withdrawals
- death claims
- increments
- assignment
- changing the trustees
- changing the beneficiaries.

In order for the bond provider to check the details held on the CRBOT, they will require the trustees to give them authority to access the register. The trustees must complete an **access request form** (see **Appendix 1**) and send this to the bond provider.

The bond provider is then able to use the access request form to obtain an access number from the Irish Revenue allowing them 90 days to view the trust details held on the CRBOT to complete their discrepancy checks. See panel right.

1

Complete access request form within 90 days of a trigger event and send to the bond provider.

2

On receipt of access request form, Irish Revenue will issue access number to the bond provider.

3

Provider accesses the CRBOT to do their discrepency check.

4

If details match, the request will be actioned. If details do not match, provider will ask for the CRBOT to be updated and a second discrepency check will be completed before the request can be actioned.

Maintaining the register

It's important that the trustees keep the details held on the register up to date as this may speed up administration when access may be needed. Changes of beneficial ownership will require the details held on the CRBOT to be amended.

However, UK trustees will not be able to log in to the register and amend the details held. Instead, they will need to contact the Irish Revenue who will issue an amendment form and make the changes on behalf of the trustees. Requests to make amendments to the details held should be directed to **NonResCRBOT@Revenue.ie**

Appendix 1: Access request form

Non-Resident Trust Register Access Number Application

If a Designated Person requires access to the Trust Register to verify the Beneficial Ownerships of the Trust the Trustee can give permission to the Designated Person to apply for a Trust Register Access Number on their behalf.

Name of Trust:

Trust Registration Number:

Name of Trustee:

Name of Designated Person: Standard Life International Ltd

I authorise the above Designated Person to apply for a Trust Access Number to the Central Register of Beneficial Ownership of Trusts (CRBOT) for the above Trust Reg istration Number to enable them to carry out their due diligence

Signed by trustee:

Date:

Appendix 2: Presenter form

Presenter Form – Central Register of Beneficial Ownership of Trusts

Trust Name:
(Block Capitals)

Presenter Name:
(Block Capitals)

Trustee Name:
(Block Capitals)

I confirm that with effect from D D M M Y Y Y Y I authorise the above Presenter to act as my representative in respect of all my obligations in relation to the Central Register of Beneficial Ownership of Trusts (CRBOT).

Signed (Trustee): _____

Date: D D M M Y Y Y Y

Signed (Presenter): _____

Date: D D M M Y Y Y Y

For more information visit aberdeenadviser.com

Issued by a member of the Aberdeen Group, which comprises the Aberdeen Group plc and its subsidiaries. Any links to websites, other than those belonging to the Aberdeen Group, are provided for general information purposes only. We accept no responsibility for the content of these websites, nor do we guarantee their availability. Any reference to legislation and tax is based on Aberdeen's understanding of United Kingdom law and HM Revenue & Customs practice at the date of production. These may be subject to change in the future. Tax rates and reliefs may be altered. The value of tax reliefs to the investor depends on their financial circumstances. No guarantees are given regarding the effectiveness of any arrangements entered into on the basis of these comments.

Aberdeen Group plc is registered in Scotland (SC286832) at 1 George Street, Edinburgh, EH2 2LL Aberdeen Platform Limited is registered in Scotland (SC180203) at 1 George Street, Edinburgh, EH2 2LL. Aberdeen Platform Limited is authorised and regulated by the Financial Conduct Authority.

ADV432 1125 © Aberdeen Group plc 2025. All rights reserved.