



REGULATORY BRIEFING

CBI Regulatory & Supervisory Outlook 2026

What it means for Payment Institutions and E-Money Institutions authorised in Ireland, and the questions your Board, CEO, and Head of Compliance should be asking now.

26 Feb 2026

March 2026

Action Required

CBI Publication Date

Issued by Finvisor

Board · CEO · Head of Compliance

Payment Institutions

E-Money Institutions

CBI-Authorised Firms

58

CBI-authorized payment & e-money firms

€11.8bn

Safeguarded customer funds
+17% YoY · end-2025

€702bn

Payment transactions processed
+14% YoY · 2025

€57m

Fraudulent payments recorded
3x prior year · 2024

OVERVIEW

The RSO Is a Statement of Supervisory Intent

On 26 February 2026, the Central Bank of Ireland published its third annual Regulatory & Supervisory Outlook, setting out its risk assessment, supervisory priorities, and planned activities across all sectors it regulates.

For Payment Institutions and Electronic Money Institutions, the RSO is not an academic exercise. It is a direct communication of where the CBI will focus supervisory attention in 2026 and where it expects to find improvement. Firms not already aligned to these priorities should treat this as an urgent prompt to review their compliance monitoring programmes.

FINVISOR VIEW

This RSO is **more directive than prior editions**. The introduction of the PCF Head of Safeguarding, enhanced REQ submissions, and planned thematic reviews across all five focus areas signals a regulator moving from observation to active intervention. Firms should not wait to be contacted.

CBI KEY MESSAGES

What the CBI Is Telling the Sector

The CBI's key messages for the PI and EMI sector are direct and should be read as statements of supervisory intent. Consider each carefully against your current framework.

01

Customer-centricity is non-negotiable

The CBI identifies an absence of a customer-focused culture, with consumer interests neglected in favour of growth, described as a root cause of many observed failures.

Root Cause Finding

02

Safeguarding remains a zero-tolerance area

Despite repeated supervisory engagement, significant deficiencies persist. The new PCF Head of Safeguarding role is effective February 2026. Immediate action is expected.

Immediate Action Required

03

Financial crime risk management is inadequate

Firms continue to show insufficient understanding of ML/TF risk exposure, leading to ineffective frameworks, particularly amongst newer entrants.

AML/CFT

04

Business model resilience is under scrutiny

Increasing competition, high operating costs, and market saturation are causing financial strain. The CBI expects credible, actionable wind-down plans from all firms.

Financial Resilience

05

Operational & cyber resilience must be demonstrated

Incident levels increased in 2025. DORA reporting obligations are live. IT outsourcing thematic review findings are expected in H1 2026.

DORA · Cyber

06

Governance and board effectiveness will be assessed

Thematic reviews of board composition, resourcing, and oversight structures are planned, particularly where firms form part of wider international groups.

Governance

SUPERVISORY PROGRAMME

The CBI's Five Focus Areas for PIs and EMIs in 2026

The CBI has structured its 2026 supervisory programme around five focus areas, each with specific planned activities across H1 and H2 2026.

#	FOCUS AREA	WHAT THE CBI IS LOOKING FOR	TIMING
1	Safeguarding of Customer Funds	Operational effectiveness of safeguarding processes and controls. Assessment of firm actions to address previously identified gaps. Implementation of the new PCF Head of Safeguarding role.	H1 & H2 2026
2	Financial Crime (AML/CFT & Fraud)	Adequacy and effectiveness of AML/CFT risk management frameworks. Enhanced REQ submissions with new quantitative and qualitative data. Cross-sectoral review of fraud controls and fair treatment of fraud victims.	H1 & H2 2026
3	Business Models & Financial Resilience	Thematic review of financial resilience, strategic planning, and wind-down plans. Firm-by-firm engagement on EBA Q&A 2022_6336 (e-money definition implications).	H2 2026
4	Operational & Cyber Resilience	IT outsourcing thematic review findings published H1 2026. DORA Registers of Information and major incident reporting assessments. PSD3/PSR implementation readiness.	H1 2026
5	Culture, Governance & Risk Management	Thematic reviews: customer communications, complaints root cause analysis, vulnerable customer treatment, and board composition. Agent/distributor model review from H2 2026.	H1 & H2 2026

BROADER CONTEXT

Wider Supervisory Priorities Relevant to Your Business

Beyond the five sector-specific focus areas, the CBI has identified cross-sectoral priorities that will shape supervisory engagement throughout 2026.

GEOPOLITICAL & MACRO

Geopolitical & Macro Resilience

Embedding operational resilience, cyber security, and financial stress-testing into governance and risk management. Firms with significant cross-border exposure should review their scenario analysis frameworks.

CONSUMER PROTECTION

Consumer & Investor Protection

Day-to-day operations, the customer experience, complaints handling, fair treatment of vulnerable customers, and fraud response are primary supervisory focuses in 2026. This is not a box-ticking exercise.

TECHNOLOGY & AI

Technology & AI Governance

The CBI is developing its supervisory approach to AI and watching how firms manage technological transformation. Firms using AI tools in operations or transaction monitoring must ensure appropriate governance is in place.

PAYMENTS LANDSCAPE

Sustainable Finance & Payments Evolution

PSD3 and the Payment Services Regulation are progressing at EU level. The CBI expects firms to be actively monitoring implementation timelines and assessing business model impacts ahead of transposition.

CALL TO ACTION

Questions Your Firm Should Be Asking Now

This RSO should prompt an honest review of your compliance programme. Below are the priority questions for each key stakeholder, mapped to the CBI's stated concerns.

BOARD

5 Questions

- Have we received a formal briefing on the CBI's 2026 supervisory priorities and what they mean for our risk exposure?
- Do we have a credible, tested wind-down plan that prioritises the timely return of customer funds?
- Is consumer-centricity genuinely embedded in our culture and decision-making, or does growth take precedence?
- Is our safeguarding framework operating as intended? Has a recent independent review been conducted?
- Are our board composition and governance structures adequate for our current scale and risk profile, and would they withstand a CBI thematic review?

CEO

5 Questions

- Is our Annual Compliance Monitoring Plan (ACMP) for 2026 aligned to the CBI's stated supervisory priorities and focus areas?
- Are we adequately resourced in the financial crime, safeguarding, and operational resilience functions?
- Is our DORA programme on track, including Registers of Information and major incident reporting procedures?
- Have we assessed the business model implications of EBA Q&A 2022_6336 on the definition of e-money, and do we need to take any action?
- Have we appointed a PCF Head of Safeguarding and embedded this into our governance structure?

HEAD OF COMPLIANCE

5 Questions

- Review your AML/CFT Risk Assessment and BWRA against CBI expectations, are your inherent risk ratings and controls commensurate with your actual risk exposure?
- Map the CBI's five focus areas to your ACMP and identify any gaps or areas requiring enhanced monitoring or testing.
- Assess your operational and cyber resilience posture, review outsourcing registers, incident management procedures, and DORA readiness.
- Prepare for the enhanced REQ submission, does your data infrastructure support the new quantitative and qualitative requirements?
- Review your complaints handling framework, are you correctly identifying all expressions of dissatisfaction as formal complaints?

HOW FINVISOR CAN HELP

Supporting Your 2026 Compliance Programme

Finvisor works as an embedded regulatory partner, not a distant advisory firm. We sit alongside your team to get things done: drafting, project managing, engaging with the regulator, and producing board-ready deliverables.

<p>01</p> <h3>Compliance Monitoring Plan Review</h3> <p>Assessment of your 2026 ACMP against the CBI's supervisory priorities, identifying gaps and recommended enhancements.</p>	<p>02</p> <h3>AML/CFT Maturity Assessment</h3> <p>Independent review of your BWRA, AML/CFT framework, and controls maturity against JMLSG guidance and CBI supervisory expectations.</p>	<p>03</p> <h3>Safeguarding Review</h3> <p>End-to-end review of your safeguarding framework, policy documentation, reconciliation processes, and PCF governance arrangements.</p>
<p>04</p> <h3>Wind-Down Plan Development</h3> <p>Construction or review of your wind-down plan, including financial modelling of costs, fund return scenarios, and trigger mechanisms.</p>	<p>05</p> <h3>Governance Gap Analysis</h3> <p>Assessment of board composition, Terms of Reference, MI reporting, and risk management governance against CBI expectations for your size and complexity.</p>	<p>06</p> <h3>DORA Readiness Assessment</h3> <p>Review of your DORA implementation programme, Registers of Information, ICT incident classification and reporting, and third-party risk management.</p>

30%

of CBI MICA CASP authorisations supported by Finvisor in 2025

~11%

of FCA EMI authorisations in 2025 guided by our team

100%

Success rate across all regulatory engagements

ABOUT FINVISOR

Embedded. Expert. Accountable.

<p>PAYMENT & E-MONEY SPECIALISTS</p> <p>We work exclusively in the payments, EMI, and crypto-asset sectors across FCA, CBI, and Bank of Lithuania jurisdictions.</p>	<p>EMBEDDED, NOT ADVISORY</p> <p>We sit inside your workstreams. We draft the documents, manage the timelines, respond to requisitions, and produce deliverables and get it done.</p>	<p>FORMER REGULATORS & PRACTITIONERS</p> <p>Our team brings decades of experience from EY, Accenture, Morgan Stanley, Capgemini, and leading compliance roles across banking and fintech.</p>	<p>PROVEN TRACK RECORD</p> <p>From authorisation through ongoing compliance, our clients benefit from a team that has navigated the full regulatory lifecycle, repeatedly and successfully.</p>
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Discuss what this RSO means for your business

If you would like to explore how Finvisor can support your 2026 compliance programme, please reach out to your Finvisor contact or get in touch directly.

info@finvisor.ie
www.finvisor.ie

