

Sanctions questionnaire for supervised businesses

For the purposes of this questionnaire:

Order means Money Laundering (Jersey) Order 2008.

Other terms, where relevant, have the same meanings as described in the Order.

Handbook means the currently issued Handbooks for the Prevention and Detection of Money Laundering and the Financing of Terrorism, comprising:

- › The AML/CFT Handbook for Regulated Financial Services Businesses
- › The AML/CFT Handbook for the Accountancy Sector
- › The AML/CFT Handbook for the Legal Sector
- › The AML/CFT Handbook for Estate Agents and High Value Dealers.

Enhanced risk states refers to high risk jurisdictions subject to Financial Action Task Force's call for action and the United Nation Security Council Resolutions (UNSCR) targeted financial sanctions related to the proliferation of weapons of mass destruction (see Handbook Appendix D1)

Higher risk jurisdictions refers to countries or territories identified by credible sources, as:

- › Having deficient regimes to counter money laundering, terrorist financing and proliferation financing (see source 2 of Handbook Appendix D2) or
- › State sponsors of terrorism/ terrorist safe havens (see source 5 of Handbook's Appendix D2) or
- › State actors on proliferation of weapons of mass destruction and its financing.

Sanctioned countries or territories refers to jurisdictions subject to financial sanctions, embargos or similar restrictive measures issued by, for example, the United Nations and United Kingdom (see Source 6 of Handbook's Appendix D2).

Targeted financial sanctions means both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefits of designated persons and entities.

Targeted financial sanctions related to terrorism and terrorist financing refer to designations made under the UNSCRs 1267(1999), 1988(2011), including any future successors, and UNSCR 1373(2001).

Targeted financial sanctions related to proliferation refer to designations made under the UNSCR 2231(2015) and UNSCRs 1718(2006), including any future successors.

This questionnaire is not designed or intended to collect personal data, so please do not include any information that directly identifies any individual.

Insert the unique identifying number, provided in the covering email, here:

1. Screening

1.1 What screening tool is used?

Free format

1.2 Is the screening manual, automated or both?

Manual/Automated/Both

1.3 How often does screening occur?

Daily

Monthly

Quarterly

Annually

Other (provide details) (Free format)

1.4 Who is included in screening process?

Select all that apply:	Manual	Automated	N/A
High risk rated customers			
Standard risk rated customers			
Low risk rated customers			
All customers			
All prospective customers			
Beneficial owners and controllers of customers or prospective customers			
Third parties acting for customers or prospective customers			
Third parties the customer or prospective customer is acting for			
Obligated persons			
Introducers of business			
Other (specify in comments box below)			

Comments: [Free format box]

1.5 When do you screen the above?

Select all that apply:	Manual	Automated	N/A
When on-boarding a potential customer			
Before a customer conducts any transactions			
After customer acceptance			
When there is an amendment to the relevant screening data sources			
When customer data changes			
As part of every periodic customer review			
When changes are identified in the customer's profile during the lifecycle of the customer relationship			
Other (specify in the comments box below)			

Comments: [Free format box]

1.6 Do you screen against another jurisdiction's sanctions list?

Yes/No

1.7 If so, when do you screen against another jurisdiction's sanctions list?

Select all that apply:	Yes	No	N/A
When your operations are taking place within another jurisdiction			
When goods or components originate from that other jurisdiction			
When you are dealing with jurisdictions known as having strong links to sanctioned countries			
When you or your customer has a parent, subsidiary or affiliate in a sanctioned country			
When you work through a local agent or supplier with another country connection			

Other (specify): [Free format box]

1.8 Please indicate the customer data that is included in screening:

Select all that apply	Full name/Aliases	Date of birth/ Registration	Place of birth/ Jurisdiction of registration	ID or passport Identification number/ Registration number	Home address/ Address of registration	N/A
High risk rated customers						
Standard risk rated customers						
Low risk rated customers						
All customers						
All prospective customers						
Beneficial owners and controllers of customers or prospective customers						
Third parties acting for customers or prospective customers						
Third parties the customer or prospective customer is acting for						
Obligated persons						
Introducers of business						

Other (specify): [Free format box]

1.9 Do you review the data used in the screening process to ensure data integrity?

Yes/No

1.10 If you have answered yes, provide the date the data was last reviewed.

DD/MM/YYYY

1.11 Do you reconcile the data feeds in your screening tool to ensure that all required data is captured?

Yes/No

1.12 If you have answered yes, how often is this done?

Daily

Monthly

Quarterly

Annual

Other (free format)

1.13 Does your screening include the following variables?

Select all that apply:	Yes	No	N/A
Different spellings of names			
Name reversal			
Shortened names			
Maiden names			
Removing numbers from entities			
Insertion/removal of full stops and spaces			
Spelling of names in all relevant languages (e.g. against Cyrillic script) when considering your activities and customer base			

1.14 Is screening done on a risk-based approach?

Yes/No

1.15 If you have answered yes, please explain the approach for screening.

Free format

1.16 Have you identified any limitations in your sanctions screening tool?

Yes/No

1.17 If yes, please provide details.

Free format

1.18 How often is the screening tool amended or updated?

Daily

Monthly

Quarterly

Annually

Other (please provide details) (Free format)

1.19 When was the screening tool last amended or updated?

DD/MM/YYYY

1.20 Who can make modifications to the screening tool?

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			
Administrator			
Group function located outside of Jersey (provide details in comments box below) (Free format)			
Other (specify in comments box below)			

Comments: [Free format box]

1.21 Do you test any modifications to your screening tool before going live?

Yes/No/NA

1.22 If you have answered yes, advise who does the testing:

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			
Administrator			
Group function located outside of Jersey (provide details in comments box below) (Free format)			
Other (specify in comments box below)			

Comments: [Free format box]

1.23 Do you formally approve any modifications or updates on your screening tool?

Yes/No/ NA

1.24 If you have answered yes, advise who approves these updates:

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			

Administrator			
Group function located outside of Jersey (provide details in comments box below) (Free format)			
Other (specify in comments box below)			

1.25 What data sources are used by your screening tool for screening?

Select all that apply:	Manual	Automated	N/A
The UK Sanctions list			
The Consolidated list			
The UK proscribed terrorist groups and organisation list			
Internal watch lists			
Group watch lists			
Others – list in comments box below			

Comments: [Free format box]

1.26 Who can add, amend or remove data sources, lists or list entries from the screening tool?

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			
Administrator			
Group function located outside of Jersey (provide details in comments box below)			

Other (specify in comments box)			
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Comments: [Free format box]

1.27 How often are the data sources updated in your screening tool?

Daily

Monthly

Quarterly

Annually

Other (please provide details) (Free format)

1.28 How do you monitor changes to designations on sanctions lists and proscribed lists, which are in force or may be introduced in Jersey?

Free format

1.29 Have you registered to receive [Jersey Gazette notices](#) relating to sanctions?

Yes/No

1.30 What logic is used for matching names by the screening tool?

Fuzzy

Exact

Other (please provide details) (Free format)

1.31 When was the effectiveness of the matching criteria last tested for your screening tool? Skip if unknown.

DD/MM/YY

1.32 Who carried out the testing of screening effectiveness?

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Specialist third party provider			

Provider/Vendor of screening tool			
Group function			
Other (specify in comments box below)			

Comments: [Free format box]

2. Screening activity

2.1 Please indicate how many relationships you have where there is a confirmed connection to a sanction or an enhanced risk state.

Select all that apply	Number of relationships
High risk rated customers	
Standard risk rated customers	
Low risk rated customers	
All customers	
All prospective customers	
Beneficial owners and controllers of customers or prospective customers	
Third parties acting for customers or prospective customers	
Third parties the customer or prospective customer is acting for	
Obligated persons	
Introducers of business	
Other (specify in comments box)	

Comments: [Free format box]

2.2 Do you have links with enhanced risk states, whether through financing trade, trade with customers who operate in such countries, or customers who have associates that operate in such countries?

Yes/No

2.3 If you answered yes to the previous question:

(i) Is enhanced customer due diligence carried out on counterparties and goods subject to trade?

Yes/No/NA

(ii) Is evidence sought from exporters that the trade is legitimate?

Yes/No/NA

(iii) Do you screen trade transactions against dual-use goods lists?

Yes/No/NA

2.4 Do you have a clearly defined process for review of potential sanctions matches?

Yes/No

2.5 If you answered yes to the previous question, who reviews potential hits identified by your screening tool?

Select all that apply	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			
Administrator			
Group function located outside of Jersey (provide details in comments box below)			
Other (specify in comments box below)			

Comments: [Free format box]

2.6 Do senior management have clearly assigned responsibility for compliance with sanctions?

Yes/No

2.7 Who is responsible for confirming if there is a positive match?

Select all that apply:	Manual	Automated	N/A
IT			
Compliance			
Board/Senior Management			
Relationship Manager			
Administrator			
Group function located outside of Jersey (provide details in comments box below)			
Other (specify in comments box below)			

Comments: [Free format box]

2.8 In respect of your screening activities, please confirm the following:

	Number
In the last 12 months, how many potential hits were generated from screening?	
In the last 12 months, how many of these potential hits are reviewed in a typical one-month period?	
How many of the potential hits in the past 12 months were false positives?	
Of those potential hits reviewed in the past 12 months, how many required further action of some kind?	
Of those potential hits reviewed in the past 12 months, how many resulted in a system generated report or internal suspicious activity report being made to your MLRO?	
Of those potential hits reviewed in the past 12 months, how many resulted in an external suspicious activity report being made by your MLRO to the Joint Financial Crimes Unit?	

Of those potential hits reviewed in the past 12 months, how many resulted in a confirmed match of some kind to sanctions or designated individuals or entities?	
Of those potential hits reviewed in the past 12 months, how many resulted in a report being made to the Minister for External Relations and Financial Services)?	

2.9 Is monitoring conducted on discounted hits?

Yes/No

2.10 Is quality assurance testing conducted?

Yes/No

2.11 Is the monitoring and outcome of the monitoring evidenced in a report?

Yes/No

2.12 If you answered yes to the previous question, who is this report presented to?

Free format

Provide the last date this report was presented.

DD/MM/YYYY

3. Transactions

3.1 What information is included in your transaction screening process?

Select all that apply	
Names of the parties involved in a transaction, including the remitter and beneficiary	
Names of any third parties, and their associates	
Names of recipients of corporate donations or sponsorship	
Bank Names, Bank Identifier Code (BIC) and other routing codes	
Free text fields, such as payment reference information or the stated purpose of the payment	
International Securities Identification Numbers (ISIN)	

Other (Free format)	
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- 3.2 Do you conduct real-time screening of transactions related to cross-border payments, foreign correspondent accounts, trade related products or payable-through accounts?

Yes/No/NA

- 3.3 If you have answered yes, please explain what additional identifiers are included in your screening process

Select all that apply	
Goods lists (dual use goods or other restricted items lists)	
Trade finance counterparties (importer, exporter, manufacturer, drawee, drawer, notify party, signatories, shipping companies, freight forwarders, insurance companies, agents and brokers etc.)	
Vessels, including International Maritime Organisation (IMO) numbers	
Geography, including a multitude of addresses, countries, cities, towns, regions, ports, airports of goods origin, transit and destination	
Other (Free format)	

- 3.4 Who reviews a sample of any transactions identified as potentially linked to a sanction?

Select all that apply	
IT	
Compliance	
Board/Senior Management	
Relationship Manager	
Administrator	
Group function located outside of Jersey (provide details in comments box below)	
Other (Free format)	

Comments: [Free format box]

3.5 For your transaction screening activities, provide the following:

	Number
In the last 12 months, how many potential hits were generated from screening?	
In the last 12 months, how many of these potential hits are reviewed in a typical one-month period?	
How many of the potential hits in the past 12 months were false positives?	
Of those potential hits reviewed in the past 12 months, how many required further action of some kind?	
Of those potential hits reviewed in the past 12 months, how many resulted in a system generated report or internal suspicious activity report being made to your MLRO?	
Of those potential hits reviewed in the past 12 months, how many resulted in an external suspicious activity report being made by your MLRO to the Joint Financial Crimes Unit?	
Of those potential hits reviewed in the past 12 months, how many resulted in a confirmed match of some kind to sanctions or designated individuals or entities?	
Of those potential hits reviewed in the past 12 months, how many resulted in a report being made to the Minister for External Relations and Financial Services?	

3.6 List any other measures you have established to manage the risk that transactions, customers or other individuals or entities are related to sanctions, the financing of terrorism and/or the financing of proliferation of weapons of mass destruction.

Free format

4. Licenses

4.1 Do you have any asset-freeze or other licences in place?

Yes/No

4.2 If you answered yes, provide details.

Free format

4.3 Provide the number of customers the asset-freeze or other license(s) relate to.

Free format text box

4.4 Who applies/would apply to the Ministry of External Relations for a licence?

MLRO

MLCO

Sanctions expert

IT

Group function

Senior Management

Other (please provide details) (Free format)

4.5 Is there a policy and procedure in place for applying for a licence?

Yes/No

5. Outsourcing

5.1 Do you rely on a third party service provider or group function to carry out any element of your screening activities?

Yes/No

5.2 Is that screening carried out by a third party service provider or group function outside of Jersey?

Yes/No/NA

5.3 If you answered yes, are they aware of the Jersey specific reporting requirements?

Yes/No/NA

5.4 If you answered yes, list measures in place to ensure that this is the case.

Free format

5.5 Have we been notified of any outsourcing arrangement?

Yes/No/NA

5.6 How often is the screening activities carried out on your behalf by a third party service provider or group function reviewed?

Monthly

Quarterly

Annual

Other (free format)

Not Applicable

5.7 When was oversight last carried out? Skip if not applicable.

DD/MM/YYYY

5.8 How was oversight carried out?

Select all that apply	Yes	No
Routine reporting		
Questionnaire		
Desk based assessment		
On-site visit		
Not Applicable		

5.9 Was the third party service provider or group function able to provide the relevant information on demand and without delay?

Yes/No/NA

5.10 If you answered no, provide details of the action taken by your business.

Free format

6. Record keeping

6.1 In respect of screening activities are records retained that evidence the following:

Select all that apply	Yes	No
The nature of the potential match		
Persons or entities matched		
Investigations carried out		
Rationale for discounting potential matches		

Action taken in respect of confirmed matches		
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6.2 Are the records readily accessible?

Yes/No

6.3 Are the records held in Jersey?

Yes/No

6.4 If you have answered no, confirm where the records are maintained.

Free format

6.5 Have you tested that the records are accessible in Jersey or made available to you in a timely manner?

Yes/No

6.6 If you answered yes, how often are tests conducted to ensure that records are available to you without delay?

Monthly

Quarterly

Annual

Other (free Format)

7. Staff and training

7.1 Has responsibility for adherence to the sanctions regime been allocated to a specific person, if so, who? (If answering 'Other', please do not enter the name of the person, instead refer to their role, e.g. Director of Operations)

MLRO

MLCO

Compliance Officer

Dedicated Sanctions Officer

Other (Free format)

7.2 Is specific training provided to anyone with responsibility for your adherence to sanctions regimes?

Yes/No

- 7.3 How often is training given?
Monthly
Quarterly
Annually
Other (please provide details) ((Free format)
- 7.4 Is training given to staff on sanction regimes and their responsibilities?
Yes/No
- 7.5 How often is training provided?
Monthly
Quarterly
Annually
Other (please provide details free format)
- 7.6 Do you target sanctions training to specific roles within your organization?
Yes/No
- 7.7 Are staff tested on their understanding of the training provided?
Yes/No
- 7.8 How are changes to the sanctions policies and procedures and systems and controls communicated to staff?
Free format
- 7.9 Is training provided on the changes?
Yes/No
- 7.10 Who do you report the sanctions data or management information from your screening activities to?
The Board
Senior Management
Group function
Not reported

Other (please provide details free format)

- 7.11 List how you keep up-to-date with emerging sanctions, the financing of terrorism and the financing of proliferation of weapons of mass destruction risks, evolving regulatory frameworks or business expansion and strategy?

Free format

8. Policies and procedures

- 8.1 Do you have policies and procedures in place to ensure compliance with Jersey's sanctions regimes?

Yes/No

- 8.2 Do you have policies and procedures in place to ensure that your business is not used for the financing of terrorism?

Yes/No

- 8.3 Do you have policies and procedures in place to ensure that your business is not used for the financing of proliferation of weapons of mass destruction?

Yes/No

- 8.4 Do you have policies and procedures in place that take into account the local requirements of any other jurisdiction you are operating in?

Yes/No

- 8.5 How often are these policies and procedures updated?

Monthly

Quarterly

Annually

Other (provide details) (Free format)

- 8.6 Confirm that your policies and procedures relating to sanctions, terrorist financing and the financing of proliferation of weapons of mass destruction are up to date.

Yes/No

- 8.7 Who is responsible for updating the policies and procedures relating to sanctions?

Select all that apply:	
IT	
Compliance	
Board/Senior Management	
Relationship Manager	
Administrator	
Group function located outside of Jersey (provide details in the comments box below) (Free format)	
Other (specify)	

Comments: [Free format box]

8.8 Who approves these policies and procedures?

Select all that apply:	
IT	
Compliance	
Board/Senior Management	
Relationship Manager	
Administrator	
Group function located outside of Jersey (provide details in comments box below)	
Other (specify)	

Comments: [Free format box]

8.9 In your policies and procedures, is there a limited monetary amount to which sanctions are deemed relevant?

Yes/No

8.10 If you have answered yes, provide the reasoning for this.

Free format

8.11 Do you undertake enhanced customer due diligence for those clients connected to enhanced risk states?

Yes/No

8.12 Is there a policy and procedure in place to ensure employees meet Jersey and other reporting requirements in the event of a confirmed sanctions match?

Yes/No

9. Oversight

9.1 Do you have a documented Business Risk Assessment in place?

Yes/No

9.2 Does your Business Risk Assessment consider the impact of sanctions, proscribed terrorists and terrorist organisations, the financing of terrorism and the financing of proliferation of weapons of mass destruction risks when assessing the following factors?

Select all that apply:	Yes	No
Geographical factors		
Customer screening arrangements		
Customer, product and activity profiles		
Services provided		
Complexity and volume of transactions		
Risk appetite		
Delivery channels		

9.3 If you answered no, provide an explanation. If you include any other factors, list them below.

Free format

9.4 If not included in your Business Risk Assessment, has a separate risk assessment been conducted on the potential impact of sanctions?

Yes/No

9.3 Does your separate risk assessment consider the impact of sanctions, proscribed terrorists and terrorist organisations, the financing of terrorism and the financing of proliferation of weapons of mass destruction risks when assessing the following factors?

Select all that apply:	Yes	No
Geographical factors		
Customer screening arrangements		
Customer, product and activity profiles		
Services provided		
Complexity and volume of transactions		
Risk appetite		
Delivery channels		