

Terrorist Financing and Proliferation Financing Questionnaire

1. Entity

1. Please state the name of the licence holder *

2. Corporate Governace

2. Do you have a TF risk appetite, and if so, is it standalone or does it form part of a wider financial crime risk appetite? *

- ☐ No
- ☐ Standalone
- ☐ Part of wider financial crime risk appetite

3. Do you have a PF risk appetite, and if so, is it standalone or does it form part of a wider financial crime risk appetite? *

- ☐ No
- ☐ Standalone
- ☐ Part of wider financial crime risk appetite

4. Do you consider TF and PF risks as part of your documented Business Risk Assessment? *

- ☐ Yes
- ☐ No

5. If not considered as part of your Business Risk Assessment, are TF and PF risks considered as part of a separate documented risk assessment?

	Yes	No
Terrorist Financing	<input type="checkbox"/>	<input type="checkbox"/>
Proliferation Financing	<input type="checkbox"/>	<input type="checkbox"/>

6. Does your Business Risk Assessment and/or separate risk assessment(s) consider TF and PF risks with reference to the following factors? *

	Yes	No
Complexity and volume of transactions	<input type="checkbox"/>	<input type="checkbox"/>
Customer screening arrangements	<input type="checkbox"/>	<input type="checkbox"/>
Customer, product and activity profiles	<input type="checkbox"/>	<input type="checkbox"/>
Delivery channels	<input type="checkbox"/>	<input type="checkbox"/>
Geographical factors	<input type="checkbox"/>	<input type="checkbox"/>
Risk appetite	<input type="checkbox"/>	<input type="checkbox"/>
Services provided	<input type="checkbox"/>	<input type="checkbox"/>

7. If you consider any other factors, please list them below.

8. Who maintains overall responsibility for management of your TF and PF risks? State role not name of the individual *

9. Who is responsible for managing your TF and PF risks operationally on a day-to-day basis? State role not name of the individual *

10. Which matters, relating to TF and PF, are considered by the Board on a regular basis? *

	Yes for Terrorist Financing	Yes for Proliferation Financing	No
Compliance Monitoring Results	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Results of screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal and regulatory updates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reporting to competent authorities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. Do you have a CTF strategy, and if so, is it standalone or does it form part of a wider financial crime strategy? *

- ☐ No
- ☐ Standalone
- ☐ Part of wider financial crime strategy

12. Do you have a CPF strategy, and if so, is it standalone or does it form part of a wider financial crime strategy? *

- ☐ No
- ☐ Standalone
- ☐ Part of wider financial crime strategy

3. Systems and Controls

13. Do you have dedicated policies and / or procedures relating to the countering of terrorist financing? *

- ☐ Yes
- ☐ No
- ☐ Included as part of other financial crime related policies

14. Do you have dedicated policies and / or procedures relating to the countering of proliferation financing? *

- ☐ Yes
- ☐ No
- ☐ Included as part of other financial crime related policies and procedures

15. Do you have dedicated policies and / or procedures relating to compliance with Jersey's sanctions regime? *

- ☐ Yes
- ☐ No
- ☐ Included as part of other financial crime related policies and procedures

16. Who owns and is responsible for ensuring that the above referenced policies and/or procedures remain fit for purpose and up to date? *

	TF	PF	Sanctions	N/A
Front Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Board /Senior Management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Function	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Group Function (located outside of Jersey) (provide details)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IT Department	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (provide details)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

17. Are any of your TF and PF relevant policies and/or procedures overdue review? *

☐ Yes

☐ No

18. Do your TF and PF relevant policies and/or procedures include: *

	Yes to Terrorist Financing	Yes to Proliferation Financing	No
The application of Enhanced Due Diligence for those clients with heightened TF and/or PF risk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Guidance on how staff should raise any concerns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How to investigate potential matches resulting from screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How to freeze client assets in the event it is required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How to make necessary reporting to the relevant competent authorities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

19. Do you undertake any compliance monitoring activities relevant to your TF and/or PF policies and procedures? *

☐ Yes

☐ No

If you answered yes, please provide a list of the compliance monitoring activities with a brief description of each.

4. Clients

20. When onboarding a new client, what steps do you take to assess the associated TF risk? *

21. When onboarding a new client, what steps do you take to assess the associated PF risk? *

22. Does the calculation of a client's risk rating include TF risk factors? *

- ☐ Yes
- ☐ No

If you answered yes, please list the factors used

23. Does the calculation of a client's risk rating include PF risk factors? *

- ☐ Yes
- ☐ No

If you answered yes, please list the factors used

24. In the event you establish a heightened risk of TF associated with a client, what form(s) of Enhanced Due Diligence, relevant to the risk do you perform/obtain? Please describe. *

25. In the event you establish a heightened risk of PF associated with a client, what form(s) of Enhanced Due Diligence, relevant to the risk do you perform/obtain? Please describe. *

26. Do you specifically consider and assess TF risk associated with a client at the time of a periodic review of a client relationship? *

- ☐ Yes
- ☐ No

If you answered yes, please list the TF risk factors that you consider and assess.

27. Do you specifically consider and assess PF risk associated with a client at the time of a periodic review of a client relationship? *

- ☐ Yes
- ☐ No

If you answered yes, please list the PF risk factors that you consider and assess.

5. Screening - General

28. What data sources are used by your screening tool for TF/PF screening? Please list all sources. *

29. Please select how you identify which sanctions lists / data source to screen against *

	Yes to Terrorist Financing	Yes to Proliferation Financing	No
JFSC Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Government Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advised by a Group function	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advised by screening tool provider	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If "Other" please describe

30. How do you monitor changes to designations on applicable sanctions lists and proscribed lists? *

31. What is the typical time delay between a new or amended designation on an applicable sanctions list or proscribed list and your tool being able to screen against it? *

- ☐ 0-1 days
- ☐ 2-3 days
- ☐ 4-5 days
- ☐ 6+ days

32. Have you registered to receive Jersey Gazette notices relating to sanctions? *

- ☐ Yes
- ☐ No

33. As part of your TF and/or PF screening, do you use any additional group, third-party or publicly available jurisdictional, entity or individual screening lists? *

34. Do your screening tools incorporate fuzzy logic functionality? *

- ☐ Yes
- ☐ No

35. Do you apply any risk-based approach to any element of your screening arrangements? *

- ☐ Yes
- ☐ No

If you answered yes, please provide details and the rationale for using.

36. When was the effectiveness of your screening arrangements last evaluated? (DD/MM/YYYY or Not Evaluated) *

37. Provide details of any enhancements identified as a result of the previous evaluation not yet implemented. *

6. Screening - Client

38. Do you undertake screening of your client base manually, automated or both? *

- ☐ Manual
- ☐ Automated
- ☐ Both

39. How often do you periodically screen your client base? *

- ☐ Daily
- ☐ Weekly
- ☐ Monthly
- ☐ Annually
- ☐ Other Methodology (please specify):

40. Which customer related parties are screened as part of this process? Select all that apply: *

- ☐ All customers
- ☐ High risk-rated customers
- ☐ Medium risk-rated customers
- ☐ Low risk-rated 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
- ☐ Introducers of business
- ☐ Known associates of the customer

41. In addition to periodic customer screening, at what other times are customer related parties screened? Select all that apply: *

- ☐ When onboarding a customer
- ☐ Before a customer conducts a transaction/ activity
- ☐ Whenever there is a change to relevant data sources
- ☐ Whenever there is a change to customer data
- ☐ At the time of a periodic customer review
- ☐ At the time of a trigger event
- ☐ Other (please specify):

7. Screening - Activity

42. Do you undertake screening manually, automated or both? *

- ☐ Manual
- ☐ Automated
- ☐ Both

43. Is a monetary or value-based threshold utilised, below which screening is not applied? *

- ☐ Yes
- ☐ No

If you answered 'yes', please provide the rationale for this.

44. Is screening undertaken in real-time or post-event? *

- ☐ Real time
- ☐ Post event

45. Which parties to a transaction are screened? Select all that apply *

- ☐ Names of the parties to a transaction, including the remitter and beneficiary
- ☐ Name of any third parties and their associates
- ☐ Bank names, Bank Identifier Code and other routing codes
- ☐ Free text fields, such as payment reference information on the stated purpose of the payment
- ☐ Other (please specify):

8. Reporting

46. Who is responsible for making a report to the Minister for External Relations in the event of a confirmed match? Select all that apply *

- ☐ MLRO
- ☐ MLCO
- ☐ Dedicated Sanctions function
- ☐ IT
- ☐ Group (non-Jersey) function
- ☐ A member of Senior Management
- ☐ Other (please specify):

47. In the previous 12 months how many reports have you made to the Minister for External Relations relating to TF or PF?

	Reports No.
TF	<input type="text"/>
PF	<input type="text"/>

48. Do your policies and procedures covering TF and PF reporting include the requirement to specifically consider whether there is also requirement to submit a Suspicious Activity Report? *

- ☐ Yes
- ☐ No

9. Licences

49. Do you have any TF and/or PF related asset-freeze or other licences in place? *

- ☐ Yes
- ☐ No

If you answered yes, provide details.

50. Provide the number of customers the TF and/or PF related asset-freeze or other licence(s) relate to. *

51. Who is or would be responsible for applying to the Minister for External Relations for a licence? Select all that apply: *

- ☐ MLRO
- ☐ MLCO
- ☐ Dedicated Sanctions function
- ☐ IT
- ☐ Group (non-Jersey) function
- ☐ A member of Senior Management
- ☐ Other (please specify):

10. Training and Awareness

52. Do you provide stand-alone TF training or does it form part of wider financial crime training? *

- ☐ Stand-alone
☐ Part of wider financial crime training
☐ Both

53. Do you provide stand-alone PF training or does it form part of wider financial crime training? *

- ☐ Stand-alone
☐ Part of wider financial crime training
☐ Both

54. How often is training provided to staff? *

	Every 0 – 6 months	Every 12 – 24 months	Every 24+ months
TF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other (please specify)

55. Are staff tested on their understanding of the training provided?

	TF	PF
Yes	<input type="checkbox"/>	<input type="checkbox"/>
No	<input type="checkbox"/>	<input type="checkbox"/>

56. Other than TF/PF related policies and procedures, please provide details of any other TF/PF guidance materials provided to staff? *

57. Provide details of the steps you take to keep up to date with emerging TF/PF risks and/or evolving legal and regulatory requirements. *

58. How are changes to your TF/PF systems and controls (including policies and procedures) communicated to staff? *

59. Provide details of any enhanced or extended training provided to members of staff who have a specific role related to, or overall responsibility for, your organisation's compliance with TF/PF requirements. *

11. Outsourcing

60. Do you place reliance on a third party service provider or group function to carry out any element of your CFT/CPF activities or arrangements?

- ☐ Yes
☐ No

If yes, please provide details of those activities or arrangements, including whether they are provided from within or outside of Jersey.

61. If applicable, have you notified the JFSC of all outsourced CFT/CPF arrangements?

- ☐ Yes
☐ No
☐ N/A

62. For each of those activities or arrangements listed in response to 60, list how often you assess the effectiveness of the activities or arrangements undertaken by the third party service provider or group function.

63. Please provide details of effectiveness testing performed, for each of those activities or arrangements listed in response to 60.

