



Designated non-financial businesses and professions - Financial crime training and awareness

In Q2 2024, we conducted a thematic assessment to evaluate the compliance of designated non-financial businesses and professions (DNFBPs) with statutory and regulatory requirements related to anti-money laundering, countering financial terrorism and countering proliferation financing (AML/CFT/CPF) training. This assessment focused on whether DNFBPs had incorporated sector specific vulnerabilities into their training programmes. Additionally, we reviewed the systems and controls in place to assess the effectiveness of the training provided.



Good practice we observed

- ▶ Training included information on current money laundering, terrorist financing and proliferation financing techniques, methods, and trends. It provided an overview of sector specific red flags and was supplemented with guidance material for employees.
- ▶ A structured programme of training and awareness was provided to employees throughout the year utilising different learning methods such as online modules, face-to-face training and tests to periodically confirm that employee knowledge remained accurate and up to date.
- ▶ Senior management supported and invested time in training and raising awareness, prioritising and promoting its importance to employees.



Areas of improvement we identified

- ▶ The board and senior management did not adequately assess or fully document the effectiveness of systems and controls, including policies and procedures, related to training and awareness. Additionally, they did not take prompt action to address identified deficiencies.
- ▶ Training focussed solely or largely on money laundering risk without adequate coverage of terrorist financing and proliferation financing risks and mitigation.
- ▶ Non-relevant employees, for example front-of-house, facilities, messengers or similar, were not (as a minimum) provided with a written explanation of their obligations and potential criminal liability, including the implications of failing to make a suspicious activity report.



Key considerations

- ▶ When developing your training programme, do you consider key financial crime risks outlined in your business risk assessment and ensure these are adequately addressed as part of the training? Are references to financial crime legislation in Jersey regularly reviewed and updated in training material?
- ▶ Do you consider whether the results of compliance monitoring indicate a specific training need? Do you request employee feedback to improve the format and content of training for greater effectiveness?
- ▶ Is your training tailored to your business and the risks it faces? Is it relevant to the employees to whom it is delivered, and supplemented by relevant material published from time to time by the JFSC or FIU?