

Customer due diligence (CDD)

10 March 2021



Jersey Financial
Services Commission

JFSC Official

Agenda

CDD queries (including use of tech)

FATF listing

Q1 2021 CDD focus



CDD queries - themes

- Use of video
- Independent data sources / E-ID
- Delayed verification
- Certification of documents
- Online bills/statements
- Expired documents



Use of video

- “Video verification”/“selfies”
 - Can we use them?
 - What procedure do we need to follow?
 - Can it be considered “face-to-face”?



Independent data sources/E-ID

- How do we assess the risk or suitability?
- Will our decision be called into question by the JFSC?



Delayed verification

- What does this involve?
- What is an appropriate timeframe for the delay?





Certification of documents

- Can it be done on a video call?
- Is there a prescribed form of wording?
- Is confirmation of true likeness required?
- What does “wet signature” mean?
- What documents need to be certified?



Online bills/statements

- Can they be used as evidence?
- What are the risks/considerations/mitigants?





Expired documents

- What are the requirements/expectations in relation to expired ID documents?



Financial Action Task Force (FATF) Listing



FATF listing

- Two lists – updated three times a year
 - Countries and territories for which a FATF call for action applies (Appendix D1 and Appendix D2, source 1)
 - Countries and territories with strategic ML/TF deficiencies with agreed action plan in place (Appendix D2, source 2)

FATF listing - effect

- Enhanced measures
- Simplified measures/exemptions
- "Equivalent business"/reliance



FATF listing – Action required

- General
 - Review policies and procedures
 - Review existing customer relationships
 - Identify necessary changes or remediation
- Specifically,
 - Notify **proposed plan of action** to your supervisory contact by end March.



Q1 2021 CDD focus



Q1 2021 CDD focus

- Thematic examination
 - Enhanced due diligence and simplified due diligence
- Information gathering
 - E-ID Questionnaire for Relevant Persons





Questions?



Thank you



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