



Jersey Financial Services Commission

E-ID Questionnaire for Relevant Persons

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 Handbook for the Prevention and Detection of Money Laundering and the Financing of Terrorism for Relevant Persons.

Please insert the unique identifying number, provided in the covering email, here - (three digit box only)

Introduction

The Handbook provides guidance for Relevant Persons on how to demonstrate compliance with the regulatory framework when considering the use of smart phone and tablet applications to capture information, copy documents and take photographs of customers as part of their CDD processes (referred to hereafter as “E-ID”).

The purpose of this questionnaire is to enable the JFSC to understand the level of use of E-ID by Relevant Persons, to what extent it is being used to apply identification measures and what systems and controls (including policies and procedures) are in place at Relevant Persons to manage the risks of using E-ID.

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

1 E-ID

1.1 Does your firm use E-ID in any way in the application of identification measures?

Yes/No

If you have answered 'no', please return the questionnaire to the JFSC

Where you have answered 'Yes' to question 1.1, please respond to all of the questions below.

2 The application

2.1 What E-ID tool(s)/application(s) do you use?

Free format

2.2 Please provide the name of the E-ID tool/application provider(s)

Free Format

2.3 Please describe how the E-ID tool/application is utilised. For example, is it used ;

2.3.1 to only collect information about an individual from that individual?

Yes/No

2.3.2 to obtain evidence of that individual's identity?

Yes/No

2.3.3 to verify the identity of the individual through the submission of scanned or imaged documents in conjunction with another activity?

Yes/No

2.3.4 to collect more general relationship information about an individual from that individual, e.g. source of funds

Yes/No

2.3.5 to collect information about an individual from reliable and independent data sources and/or to carry out screening?

Yes/No

Where you have answered “yes” to any of the above, please provide further detail

Free format

2.4 Is E-ID usage applicable to all types and categories of clients?

Yes/No

If you have answered “no” to 2.4, please describe when it is used and why it is only utilised for certain clients?

Free format

2.5 Is E-ID used to verify identity and/or other information?

Yes/No

If you have answered “yes”, please answer question 2.7

2.6 If you have answered “no” to question 2.5, please explain why you do not verify the information?

Free Format

2.7 What information is the E-ID tool/application used to collect and verify?

Free format

3 Oversight

3.1 When was the use of your E-ID tool/application implemented?

DD/MM/YYYY

3.2 Who was involved in the implementation of the E-ID tool/application?

(Multiple choice, more than one option)

IT

Compliance
Board/Senior Management
Group function located outside of Jersey (please provide details)
Other (please provide details)

Free format

3.3 Does the Business Risk Assessment (“BRA”) adequately reflect the use of the E-ID tool/application?

Yes

No

If you answered “no”, please provide information as to why the use of E-ID is not included in your BRA and what steps you intend to take to remediate the matter.

Free format

3.4 Please provide the date the BRA was last updated?

DD/MM/YYYY

3.5 Was a risk assessment conducted prior to the implementation of the use of the E-ID tool/application?

Yes/No

If you answered “no”, please provide further information as to how the risk of the implementation of E-ID was assessed.

Free Format

3.6 If you answered “yes” to question 3.5 is this documented?

Yes/No

3.7 Who was involved in carrying out the risk assessment?

(Multiple choice, more than one option)

IT

Compliance

Board/Senior Management

Group function located outside of Jersey (please provide details)

Other (please provide details below)

Free Format

3.8 Please describe the due diligence that was undertaken in relation to the E-ID tool/application provider(s)? What actions did you take?

Free format

3.9 If reliance was placed on a group function outside of Jersey to carry out due diligence, how did the Board/Senior Management gain assurance that due diligence was effective and the E-ID tool/application was suitable for use by the Jersey business?

Free Format

3.10 Who approved the use of the E-ID tool/application?

(Multiple choice, more than one option)

IT

Compliance

Board/Senior Management

Group function located outside of Jersey (please provide details)

Other (please provide details) (Free format to be included)

Free Format

3.11 How does the Board/Senior Management oversee any ongoing oversight arrangements that are carried out by a group function on your E-ID provider?

Free Format

3.12 Was the E-ID application/tool tested prior to going live?

Yes

No

3.13 If you have answered yes, who was involved in the testing?

(Multiple choice, more than one option)

IT

Compliance

Board/Senior Management

Group function located outside of Jersey (please provide details)

Other (please provide details)

Free Format

3.14 Is the E-ID tool/application regularly updated and amended?

Yes

No

3.15 If you have answered yes to question 3.14, how often does this occur and when was the E-ID tool/application last amended and updated?

DD/MM/YYYY

3.16 Is the E-ID tool/application regularly tested to provide assurance that it is working as intended?

Yes

No

3.17 If you have answered yes to question 3.16, how often does this occur?

Monthly

3 months

6 months

12 months

Other (please provide details)

Free Format

3.18 Who carries out the testing?

(Multiple choice, more than one option)

IT

Compliance

Senior Management/Board
Group function located outside of Jersey (please provide details)
Other (please provide details) (Free format to be included)

Free Format

3.19 How do you ensure personal data is secure?

Free format

4 Policies and Procedures

4.1 Do you have systems and controls in place (including policies and procedures) regarding the use of the E-ID tool/application?

Yes

No

Partial

If you have answered yes, please go to question 4.3

4.2 If you have answered partial to question 4.1 , please provide an explanation

Free format

4.3 How often are the E-ID policies and procedures reviewed?

3 months

6 months

12 months

Other (please provide details)

Free Format

4.4 Have the E-ID policies and procedures been approved by the Board/Senior Management?

Yes

No

If you have answered no to question 4.4, please provide an explanation

Free format

If you have answered yes to question 4.4, please provide the date Senior Management/Board approved the E-ID policies and procedures.

DD/MM/YYYY

4.5 Have staff been trained in the use of E-ID tool/application?

Yes

No

Partial

If you have answered no or partial, please provide an explanation

Free format

5 Monitoring

5.1 Has monitoring been conducted on the use and effectiveness of the E-ID tool/application?

Yes

No

5.2 If you have answered yes to question 5.1, how often does the monitoring occur? If you have answered no to question 5.1, please provide further information in the free format box.

Monthly

3 months

6 months

12 months

Other (please provide details)

Free Format

5.3 How is the monitoring carried out?

Free Format

5.4 Please advise when the last monitoring took place?

DD/MM/YYYY

5.5 Have you revisited the due diligence on the service provider since the E-ID system was implemented?

Yes

No

5.6 If you have answered yes to question 5.5, please advise when the due diligence was last revisited.

DD/MM/YYYY

6 Reporting

6.1 Are E-ID monitoring and testing results, amendments and updates shared with the Board/Senior Management?

Yes

No

Partial

6.2 If you have answered no or partial, please provide an explanation

Free format

6.3 If you have answered yes to question 6.1, please provide the most recent date this was included in the Board/Senior Management reporting.

DD/MM/YYYY

7 Records Relating to Identification Measures obtained using E-ID

7.1 Please explain how records relating to identification measures are retained and stored when using E-ID.

Free format

7.2 Please confirm how long records relating to identification measures obtained by E-ID are retained for.

Free format

7.3 How can records relating to identification measures carried out using E-ID be retrieved?

Free format

7.4 How quickly can records relating to identification measures obtained using E-ID be accessed and retrieved in Jersey?

Free format

8 Outsourcing

8.1 Do you class the use of the E-ID tool/application as an outsourced function?

Yes

No

8.2 If you answered no, please explain the type of arrangement that is in place and describe the type of support provided by the vendor, if the E-ID tool is not proprietary.

Free Format