

Terrorist Financing Diversion Risk Register Templates

Example 1

Risk area/ risk identified	Prescribed NPO's exposure to geographical area with higher TF risk
Risk Owner	[Nominated Officer/Board member]
Likelihood of occurrence (score)	probability scale (1-5)
Severity of impact (score)	Low/ Major (1-5)
Controls	<ul style="list-style-type: none"> • NPO's Risk appetite statement • Country's TF risk rating data analysis • Staff political awareness training
Monitoring process	Data analysis by nominated officer
Responsibility	Board (or equivalent)
Further action required	Escalation procedure to report any substantial change in a country's TF diversion risk
Date of review	Quarterly reporting
Useful resources/ tools	<ul style="list-style-type: none"> • Know your country rating table • Sources 1, 2, 3, 4, 5, 8, 9, 10 and 13 of Appendix D2 to the JFSC's Handbook

Example 2

Risk area/ risk identified	Direct or indirect association with a target of financial sanctions related to terrorism or terrorist financing
Risk Owner	[Nominated Officer/Board member]
Likelihood of occurrence (score)	Probability scale (1-5)
Severity of impact (score)	Low/ Major (1-5)
Controls	<ul style="list-style-type: none"> • NPO's Risk appetite statement • Sanctions screening procedure • Sanctions screening of employees, volunteers, partners, significant donors and known beneficiaries
Monitoring process	Sanctions screening by nominated officer
Responsibility	Board (or equivalent)
Further action required	<ul style="list-style-type: none"> • Escalation procedure to report positive sanctions match • Consider asset freezing if applicable • Consider sanctions compliance reporting, or Licence application to the Minister for External relations and Financial Services • Consider sanctions regimes and any other obligations you may have in any jurisdiction you are

	associated with and whether or not you need to seek independent legal advice
Date of review Useful resources/ tools	Quarterly reporting <ul style="list-style-type: none"> • Targeted financial sanctions related to terrorism and terrorist financing • The OFSI Consolidated List • The UK Sanctions List • Financial sanctions practical guidance

Example 3

Risk area/ risk identified	Direct or indirect association with Proscribed Organizations
Risk Owner	[Nominated Officer/Board member]
Likelihood of occurrence (score)	Probability scale (1-5)
Severity of impact (score)	Low/ Major (1-5)
Controls	<ul style="list-style-type: none"> • NPO's Risk appetite statement • Screening procedure • Screening of employees, volunteers, partners, significant donors and known beneficiaries
Monitoring process	Screening by nominated officer
Responsibility	Board (or equivalent)
Further action required	Escalation procedure to report positive screening match Consider disclosure to the States of Jersey Police
Date of review Useful resources/ tools	Quarterly reporting <ul style="list-style-type: none"> • Jersey's Proscribed Organisations List • UK List of proscribed international terrorist groups • Consider relevant regimes and any other obligations you may have in any jurisdiction you are associated with and whether or not you need to seek independent legal advice

Example 4

Risk area/ risk identified	Lack of knowledge, experience and skills in TF diversion risks
Risk Owner	[Nominated Officer/Board member]
Likelihood of occurrence (score)	Probability scale (1-5)
Severity of impact (score)	Low/ Major (1-5)
Controls	<ul style="list-style-type: none"> • NPO's Risk appetite statement

	<ul style="list-style-type: none"> • Anti-diversion staff training for operational staff, managers, board members, trustees, senior officers (or equivalent), whether or not they are remunerated • Promote and encourage anti-diversion culture • Relevant updates of training material
Monitoring process	Training register (or equivalent)
Responsibility	Board (or equivalent)
Further action required	Empower participants to deter, prevent, detect and respond to TF diversion Consider TF suspicion disclosure to the Jersey Police
Date of review Useful resources/ tools	Quarterly JFSC guidance: <ul style="list-style-type: none"> • Terrorist Financing • Non Profit Organisations Jersey NPO NRA