Guide to integrity checking your Section I risk based supervision data

Contents

1 Introduction

1.1 The JFSC will once again be requesting the provision of specified data through completion of a number of Excel workbooks. Section I of the exercise collects substantially the same data as in previous years except for 26 new questions that have been included for the 2023 reporting period. These are set out in appendix 5 of the [Guidance to Section I of risk based supervision data 2023](#).

1.2 This guide is intended to assist Reporting Entities perform a "sense check" on the completed Section I – Global Footprint Excel workbook prior to submitting it to the JFSC by highlighting the:

    1.2.1   mandatory questions (section 2); and

    1.2.2   relational questions (section 3).

1.3 On submission of your Section I Excel workbook you will receive an email confirming that you have successfully submitted your data. If you do not receive an email please contact myjfsc@jerseyfsc.org as there may be an issue with your submission.

1.4 Please note that whilst your submission may be successfully received by the JFSC, you may be contacted by a member of the Supervision division to discuss your data if any of the mandatory questions remain unanswered, or the relationship between certain questions has not been maintained.

1.5 To limit the number of "failed" submissions, Reporting Entities are advised to consider sections 2 and 3 of this guide before submitting their data.

2 Mandatory questions

2.1 The tables below detail the questions which are mandatory and indicate the nature of the data to be reported.

Question Number	Data required (summary text)	Data type
A1	Full name of Reporting Entity	Alpha numeric characters
A2 **and** A3	A2 must be completed by a Reporting Entity registered to carry on one or more of: (a) deposit-taking; (b) trust company business; (c) investment business; (d) fund services business; (e) AIF services business; (f) money services business; (g) general insurance mediation business (class P or Q); and (h) insurance business	X to indicate all that apply

	A3 must be completed by a Reporting Entity:
	
	  (i) registered to carry on a Specified Schedule 2 Business such as lawyers, accountants and lending.
	  (ii) which is a regulated business carrying on any activity listed with question A3.
		Dropdown menu
		(Yes ; No)

Question Number	Data required (summary text)	Data type
A17(a)	Total income (as an absolute value e.g. GBP 10,000)	Number
A17(b)	Estimate of income from regulated/Specified Schedule 2 business activity for the same period as reported in A17(a) (as an absolute value e.g. GBP 8,000)	Number
A18	Number of employees (full time equivalent)	Number
A19	Number of employees (full time equivalent) working in compliance and risk	Number
A21	Total number of customers	Number

Question Number	Data required (summary text)	Data type
The following are mandatory for Reporting Entities except those that only carry on (i) 'general' insurance business or (ii) class P or Q general insurance mediation business		
A22	Total number of unique beneficial owners and controllers of customers	Number
B1	Number of SARs handled internally	Number
B2	Number of SARS submitted to a the JFCU	Number
B3	Total number of external SARs submitted to overseas FIU?	Number
B4	Average number of working days to process an internal SAR	Number
B5	Longest number of working days taken to process an internal SAR	Number
B6	Number of 'no consent' responses received from an FIU (JFCU or overseas)	Number
B7	Number of requests for information served by an FIU (JFCU or overseas)	Number
B8	Number of production orders received in respect of an AML/CFT matter or TIEA	Number
B9	Number of disciplinary actions taken against employees	Number
B10	What frequency do you perform any of the following competence and probity checks on employees?	Dropdown menu
B11	Number of customers declassified as PEPs during the reporting period	Number

Question Number	Data required (summary text)	Data type
B12	Indication of the screening system	X to indicate all that apply
B13(a)	Trigger events for screening	X to indicate all that apply
B13(b)	Frequency of screening higher risk customers	Dropdown menu
B14	Frequency of screening whole database	Dropdown menu
C1	Number of financial sanctions positive matches	Number
C2	Number of financial sanctions positive matches reported	Number
C4	Value of funds or other assets frozen under a Jersey sanctions regime	Number
C6	How often is your screening tool amended/updated?	Dropdown menu
C7	Deficiencies in screening tool	Dropdown menu
C8	Lists used for screening	Dropdown menu
C9	Frequency of screening tool amendments	Dropdown menu
C10	Logic used for screening	Dropdown menu
C11	Effectiveness of screening tool matching criteria	Dropdown menu
C12	Screening of customers	X to indicate all that apply
C14	Maintenance of a watchlist	Dropdown menu

3   Relational questions

3.1   There are certain questions which have a relationship with each other. For example, depending on the answer given to a particular question another question may become mandatory.

3.2   The JFSC will test these relationships on receipt of your submission and if there are any discrepancies you may be contacted by a member of the Supervision division with respect to your data.

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3.3   For your information, the relational questions are explained below:

Question Numbers	Relationship
A2 & A3	Participating member column of A3 should **only** be completed if the Trust Company Business box in A2 is completed
A3 & A10	If A3 includes a 'yes' against 'Accountants' then A10 must be completed. Conversely A10 should not be completed unless A3 'Accountants' has been answered as 'yes'
A4 & A2	Only complete A4 if: › the Trust Company Business box in A2 is completed <u>AND</u> › the Reporting Entity is an affiliation leader
A5 & A2	Only complete A5 if: › the Trust Company Business box in A2 is completed <u>AND</u> › the Reporting Entity administers any private trust companies
A6 & A2	Only complete A6 if: › the Fund Services Business box in A2 is completed <u>AND</u> › the Reporting Entity is registered to carry on class ZK business
A7 & A2	Only complete A7 if: › the Fund Services Business box in A2 is completed <u>AND</u> › the Reporting Entity is providing any service to an unregulated fund
A8 & A2	Only complete A8 if: › any one of the Trust Company Business, Investment Business or Fund Services Business boxes in A2 are completed <u>AND</u> › the Reporting Entity is providing services to a Supported Fund Operator as (defined in the guidance document)
A9 & A2	Only complete A9 if: › any one of the Trust Company Business, Investment Business or Fund Services Business boxes in A2 are completed <u>AND</u> › the Reporting Entity is providing services to private funds or a service provider of a private fund
A11(a) & A11(b)	If the response to A11(a) is 'yes' then A11(b) must be completed
A12(a) & A12(b)	If the response to A12(a) is 'yes' then A12(b) must be completed
A17(a) & A17(b)	Income reported at A17(b) must be less than or equal to that reported at A17(a)

Question Numbers	Relationship
A21 & A22	A22 cannot be '0' unless A21 is also '0' If A21 and A22 are '0' an explanation of why '0' is the correct response should be provided on the Excel sheet 'E-Comments'
B1(a) & B1(b)	Where a number has been included in B1(a), a response must be provided to B1(b)
B2(a) & B2(b)	Where a number has been included in B2(a), a response must be provided to B2(b)
B10(a) & B10(b)	For each trigger event indicated in response to B10(a) a response must be provided in B10(b)
C2 & C3	If the response to C2 is any number other than '0' C3 must be completed
C4 & C5	If the response to C4 is any number other than '0' C5 must be completed
B6(a) & B6(b)	Where 'other' is selected in response to B6(a), a response must be provided to B6(b)
B7(a) & B7(b)	Where 'yes' is selected in response to B7(a), a response must be provided to B7(b)
B8(a) & B8(b)	Where 'other' is selected in response to B8(a), a response must be provided to B8(b)
B9(a) & B9(b)	Where 'other' is selected in response to B9(a), a response must be provided to B9(b)
B11(a) & B11(b)	Where 'yes' is selected in response to B11(a), a response must be provided to B11(b) and B11(c)