

Registry API Guidance – Amend Associated Party

This document, and images within it, may change as we continue to update the system. Ensure you have the latest version of the document.

Version	Date	Change
V1.0	01 March 2021	Document published
V1.1	15 October 2021	As per API version 2.0.1 release. - Associated Party Individual - Mandatory to Optional for the following fields: Nationality, Occupation, PlaceOfBirth, CountryOfBirth, IsRegulation4Application - Associated Party Entity - addition of two fields: HighRiskDetails and IsSignificantPersonShareTransfer
V1.1	01 February 2022	Update of images to reflect 2.0.1 changes
V1.1	09 February 2022	Updated guidance on IsJerseyRegulated Field

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1 Introduction

1.1 Service overview

The Amend Associated Party service allows regulated service providers to add, remove and update details of the associated parties for registered entities.

You will only be able to make calls to this service for entities for which you are a Nominated Person.

Under the Financial Services (Disclosure and Provision of Information) (Jersey) Law 2020 each entity must appoint at least one Nominated Person.

This service can be used to amend the associated parties for any of the following corporate and legal entity types:

1. Company
2. Partnerships (LP, LLP, ILP, SLP)
3. Foundations
4. LLCs (when the product law comes into force)

An associated party is a natural or legal person that undertakes a role or function with an entity that is registered with the JFSC. The associated party functions include the beneficial owner, controller and significant persons as defined in the Financial Services (Disclosure and Provision of Information) (Jersey) Law 2020 (“Registry Law”), along with further functions that are defined within the individual product laws.

This service is intended to provide API channel users with an alternative route to completing the ‘Associated Parties’ form in myRegistry.

1.2 Related API Services

It is anticipated that you will need to reference the following related API services to issue requests to this service.

#	API Service	Related Usage
1	GetEntityInformation	This service returns the current information (public and private) that the JFSC holds on record for a registered entity. This service can be called for entities for which you are a nominated person.
2	GetCountries	This is a reference data look-up service that returns ISO codes for ‘Nationality’ and ‘CountryOfRegistration’ can be retrieved via the ‘GetCountries’ service which returns ISO 3166-1 codes in alpha 2 format e.g. JE = Jersey
3	CheckSubmissionStatus	Following an API service submission, you can use this service to request the processing status (with reference to a unique submission reference number).
4	UploadAttachment	This service allows users to upload attachments prior to submitting related API filings. Once the attachment has been accepted, a barcode number is issued which can be used in subsequent filings.

1.3 Fees

No fees are applicable for this service (accurate as at 1 January 2021).

Please refer to the schedule of fees for Registry services as published on the JFSC website www.jerseyfsc.org.

1.4 Guidance

This document does not provide guidance regarding the new reporting obligations or interpretation of the new Registry Law. This document is not intended to support API users with guidance regarding beneficial ownership or controller interpretation. API users that require further guidance should refer to the guidance and documentation provided on the JFSC website.

1.5 API Integration Guidelines

API integration guidelines are available for download on the Collaboration Portal (Zoho) within the **Manuals > JFSC Registry API Manual > API Integration Guidelines**. The API integration guidelines document provides essential security, configuration and integration detail in addition to the application and on boarding process.

If you do not have access to Zoho, you may request access by email via the registryAPI@jerseyfsc.org email address.

1.6 Registry API Support

Any questions or clarifications regarding this document should be directed to the Registry API team via email at registryAPI@jerseyfsc.org

2 Intended use

2.1 Use cases

The Amend Associated Party service is provided to allow nominated persons to complete the following use cases. The use cases can be completed individually or as a combination within a single service request.

#	Use Case	Example
1	Add / remove new individuals or entities	A new beneficial owner, controller, director, secretary, member, General Partner, Deputy Secretary, Partner, Council Member, Qualified Member, Manager is appointed to an Entity (or is removed). The Associated Party matrix, as published in the API Manual on Zoho, provides a mapping of the different role types that are captured under the individual applicable laws and product laws.
2	Add / remove roles for an existing associated party	An existing associated party is appointed to additional roles in an entity they already have a relationship with.
3	Update details / particulars for an associated party	An existing associated party changes some of their information and needs to update their information e.g. their address.

2.2 Service usage principles

The following principles must be adhered to when submitting Amend Associated Party service calls:

1. IDs (for associated party and role) are returned in the response message when a new associated party or role is registered. Registration is complete, and the IDs are issued when the Registry team and reviewed and successfully registered the submission. The IDs are therefore retrieved via a subsequent service call to the *GetEntityInformation* service. The IDs must be provided in any subsequent requests to the amend associated party service when amending or removing associated parties.
2. Associated parties are normalised at an entity level. Associated party IDs may not be referenced across multiple entities. An associated party may be listed once within the context of an entity and may have multiple roles.
3. When amending or removing an existing associated party, you must populate all of the data, including those that remain unchanged. In a scenario where there are multiple associated parties, and you are only amending (or removing) a single associated party, you will need to provide full details for all associated parties. This is currently required for validation purposes.
Note: *all of the current field values are available and returned via the GetEntityInformation service.*
4. The change type field (Add, Amend, Remove, Unchanged) supports the application of business rules and validation. When adding a new Associated Party set the 'ChangeType' value to 'ADD' on the Associated Party object. Do not provide an 'AssociatedPartyID'. This is auto generated.
5. When removing an existing role set the 'ChangeType' value to 'REMOVE' and specify an 'EndDate' on the *Role* object to indicate when the Associated Party ended this role.
6. When updating the details of an existing associated party you need to include the details of all other associated parties that are linked to that entity

7. An Associated Party must hold at least one role at any point in in time. Therefore when adding a new Associated Party you must add a new Role for that party. E.g. Controller.
8. You can add multiple Associated Parties and their multiple of their Roles in one submission by setting the ChangeType value to 'ADD' on the Associated Party object and setting the ChangeType value to 'ADD' on each of the Role objects.

2.3 Service documentation

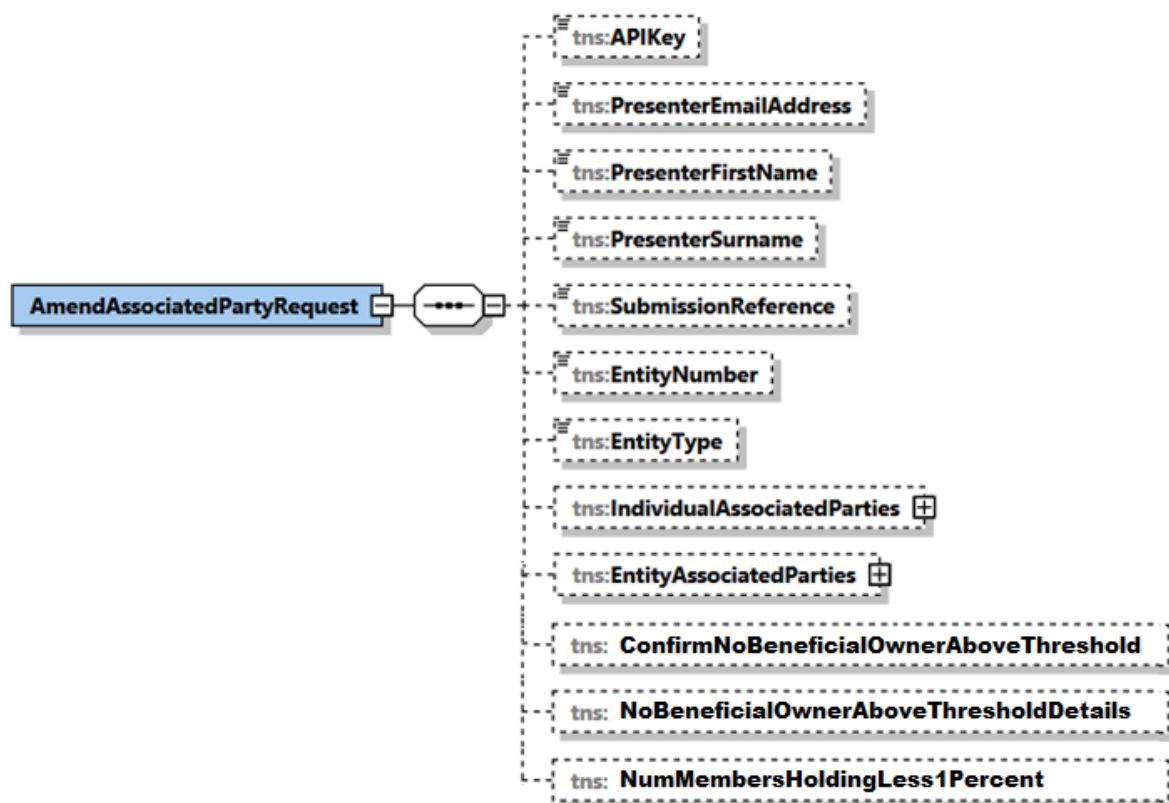
An Associated Party matrix is published as a spreadsheet in the API Manual on our Collaboration Portal (Zoho) and provides a mapping of the required data under each of the different role types. In addition, a service description is published and maintained for each release at the following locations:

<https://myreg-stg.api.jerseyfsc.org/documentation> (Test Environment)

<https://myreg.api.jerseyfsc.org/documentation> (Production Environment)

3 Service request message

In order to submit an Amend Associated Party service call you will need to build up the AmendAssociatedPartyRequest object. The structure of the request object is provided below:



An overview of the individual elements is provided in the following table.

Element	Description	Mandatory / Optional
APIKey	The API key that is issued to your organisation by the JFSC.	Mandatory

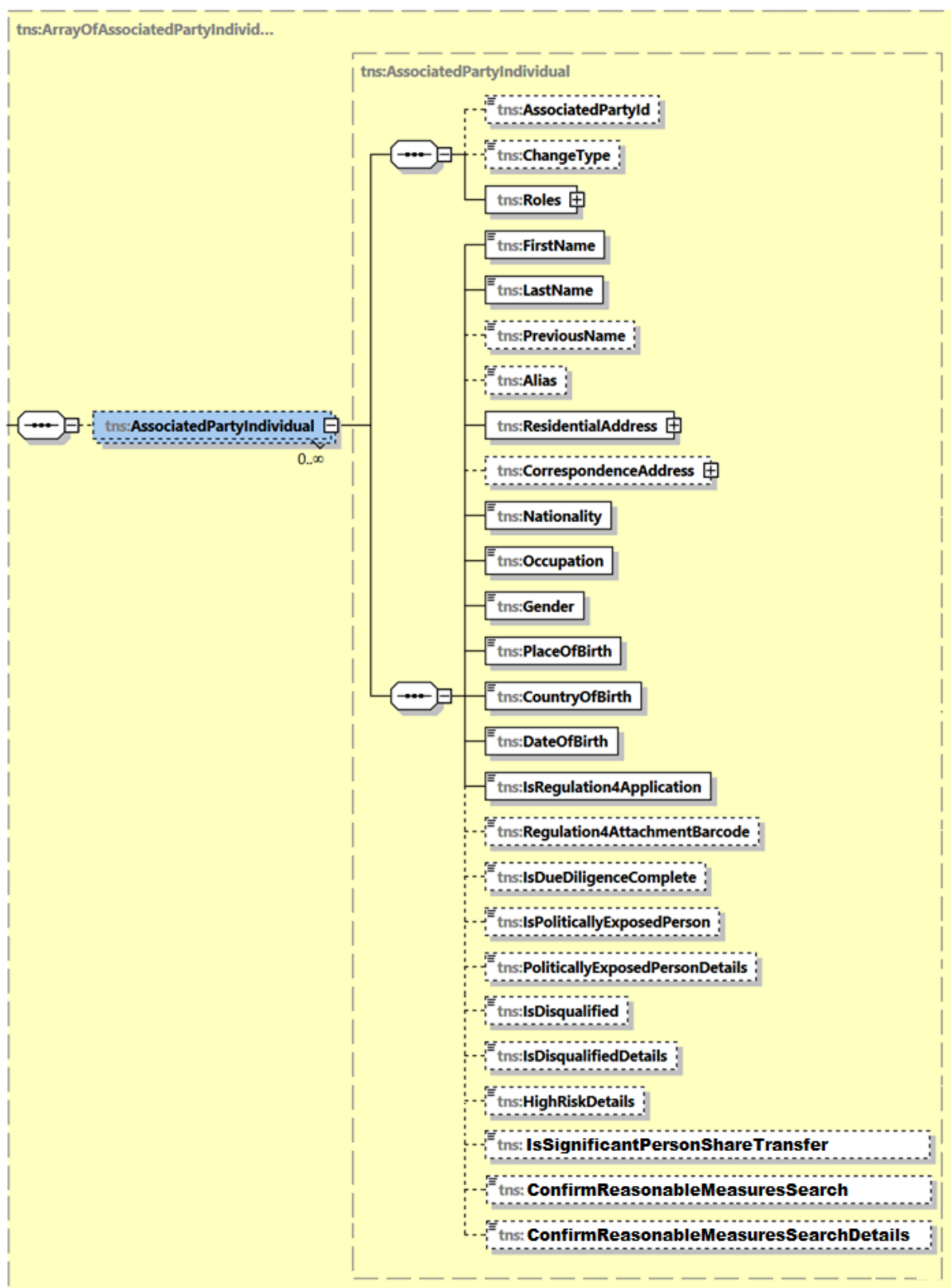
PresenterEmailAddress	Each user of the API will need to be issued with a Registry customer account. This can be administered by your lead administrator via the myRegistry portal. Note: Test API users will be provided with test credentials.	Mandatory
PresenterFirstName	The first name of the individual submitting the service call.	Mandatory
PresenterSurname	The Surname of the individual submitting the service call.	Mandatory
SubmissionReference	This is an optional input parameter that should be provided when a returned submission is being resubmitted.	Mandatory
EntityNumber	The registered number of the entity that the Associated Parties are related to e.g. 12345.	Mandatory
EntityType	The registered type of the entity. Allowed values: "RegisteredPrivateCompany", "RegisteredPublicCompany", "IncorporatedCellPublic", "IncorporatedCellCompany", "IncorporatedCellPrivate", "ProtectedCellCompanyPrivate", "ProtectedCellPrivate", "ProtectedCellPublic", "ProtectedCellCompanyPublic", "IncorporatedCellCompanyPublic", "LimitedPartnership", "Foundation", "IncorporatedLimitedPartnership", "SeparateLimitedPartnership", "LimitedLiabilityPartnership"	Mandatory
ConfirmNoBeneficialOwnerAboveThreshold	Confirm there are no beneficial owners with 25% or more ownership.	Mandatory
NoBeneficialOwnerAboveThresholdDetails	Provide additional detail if ConfirmNoBeneficialOwnerAboveThreshold is true.	Optional

NumMembersHoldingLess1Percent	What is the total number of members who each hold less than 1% in Nominal Value of each class of issued shares.	Optional
IndividualAssociatedParties	The list of individuals who are associated parties to the entity.	At minimum one of these elements needs to be provided.
EntityAssociatedParties	The list of entities who are associated parties to the entity.	

3.1 Associated Party – Individual

The associated party individual element contains four key logical groups of information:

1. The associated party ID that is issued when the party is initially added
2. The change type which indicates if the intention is to add, amend, remove or leave the party unchanged as a result of this service request
3. The roles that this party holds
4. The identity information to identify an individual associated party



The Associated Party matrix, as published in the API Manual on Zoho provides a mapping of the different role types that are required under the individual applicable laws and product laws. The matrix is presented as a spreadsheet and covers the required fields for associated parties of type individual and entity.

Within the `AssociatedPartyIndividual` component, the `IsRegulation4Application` flag will be set to true for a company that was registered under Regulation 4 of the Foundations (Continuance) (Jersey)

Regulations 2009. If this flag is set, the supporting documentation in the form of the associated barcode reference must be provided.

3.2 Associated Party – Entity

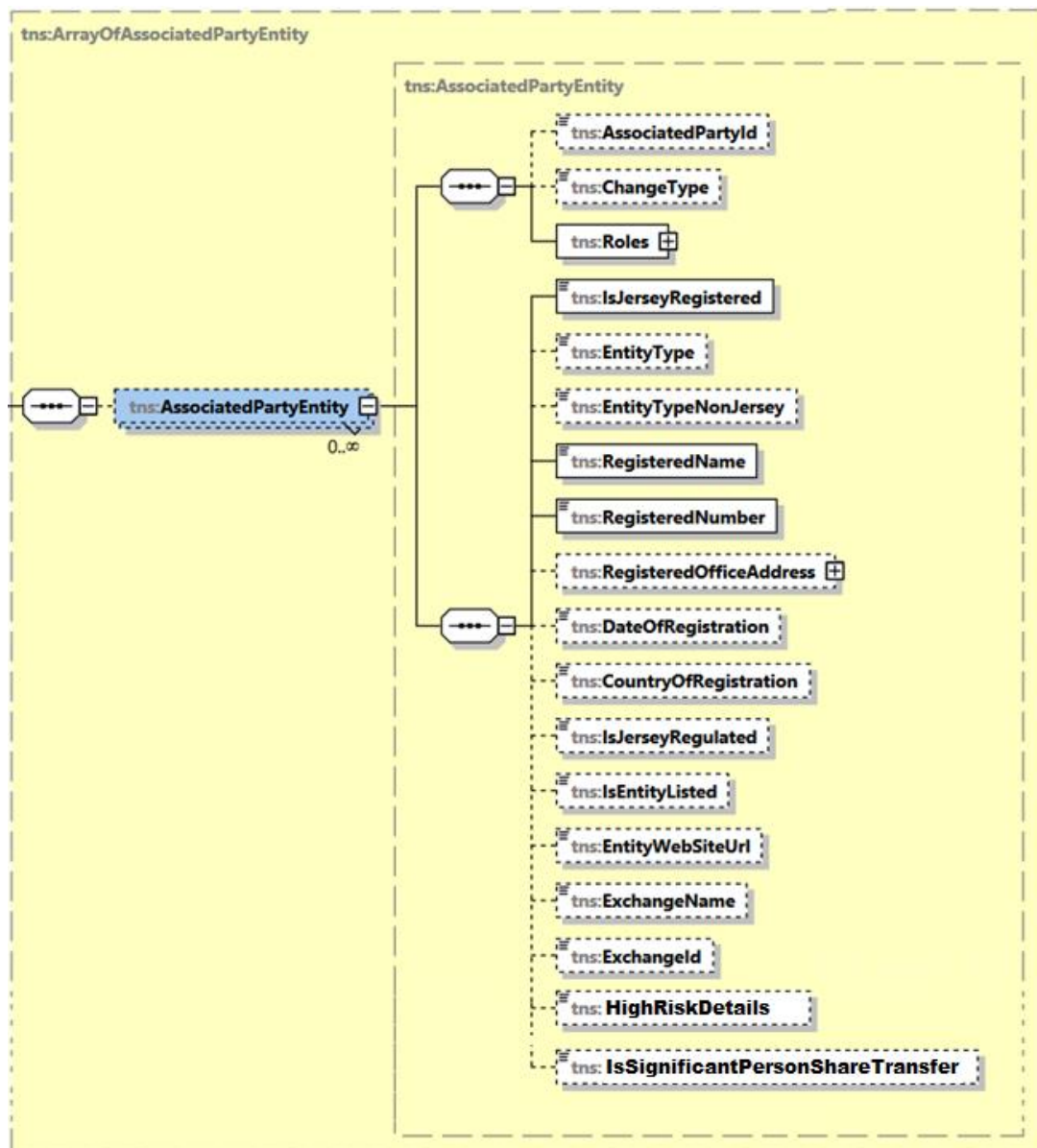
In a similar approach, the Associated Party Entity component contains the same key groups of information pertaining to the Associated Party ID, change type, roles held and the identity information of the entity that is an associated party of the entity in focus.

The user must indicate if the associated party entity is registered in Jersey and if this is the case, the entity type must be specified from the list of prescribed Jersey entity types (*see EntityType data element in the previous table*).

In the case where the user has indicated that the associated party entity is not registered in Jersey, they must provide the entity type (in the data element *EntityTypeNonJersey*) as registered in the alternative jurisdiction.

If the jurisdiction is not Jersey the *IsJerseyRegulated* field is mandatory. Indicate if the entity is regulated in Jersey / Registered to act as a Corporate Director by the Commission under the Financial Services (Jersey) Law 1998. *Not required for Subscribers or Members.

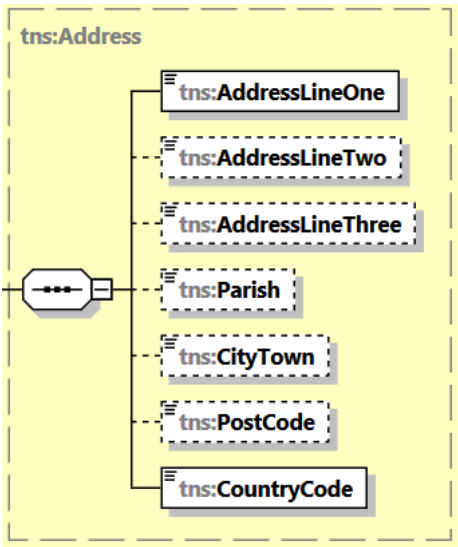
If the associated party entity is identified as registered in Jersey, the entity type and registered name must be provided. The information provided will be verified against the data on the appropriate register.



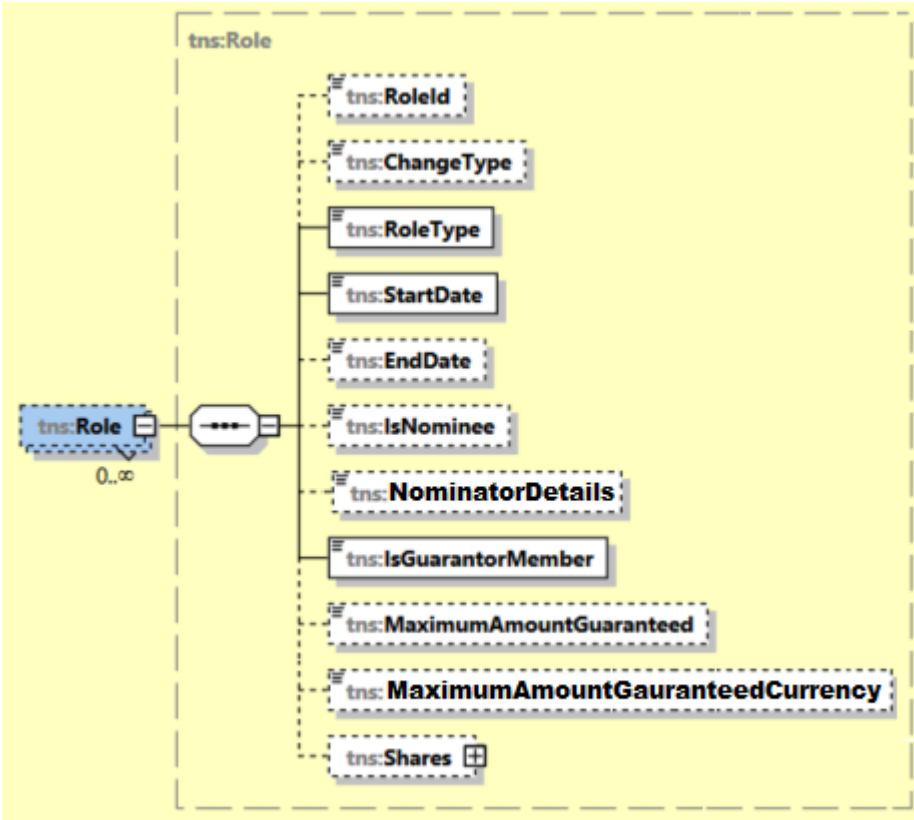
At least one Associated Party of type `AssociatedPartyIndividual` or `AssociatedPartyEntity` must be provided as part of an `AmendAssociatedParty` service request.

3.3 Addresses

The various address objects (*ResidentialAddress*; *RegisteredOfficeAddress*; and where appropriate the *CorrespondenceAddress*) across the individual and entity type associated parties have the same data element structure.



3.4 Roles



Each associated party must include at minimum one role. When adding a new 'Role' set the 'ChangeType' value to 'ADD'. Do not provide a 'RoleID'. This is auto generated.

When adding a new Role the 'StartDate' must be provided, referring to the date the Associated Party started this role.

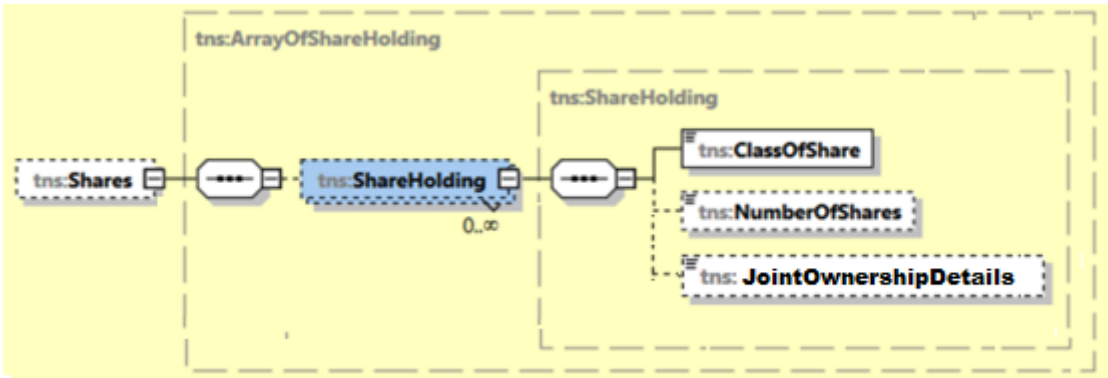
Similarly, when removing a role (with the ChangeType set to 'REMOVE'), the 'EndDate' must be provided to indicate when the Associated Party finished this role.

Valid *RoleType* options are:
"BeneficialOwner",
"Controller",
"Director",
"Secretary",

	"Subscriber", "GeneralPartner", "DeputySecretary", "Partner", "CouncilMember", "QualifiedMember", "Manager", "Member". In the instance of beneficial owner and controller, the start date should be interpreted as the date of knowledge. In the case of members (shareholders) the Shares element is required. In the case of a Nominee shareholder or Nominee Director, the <i>IsNominee</i>, <i>NominatorFirstName</i> and <i>NominatorLastName</i> are all required.
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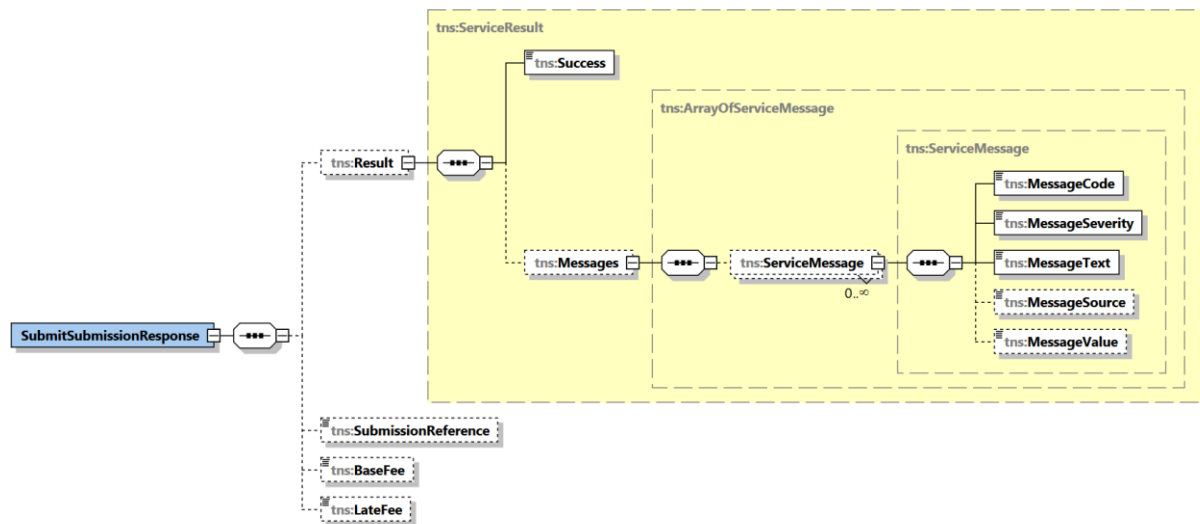
3.5 Shareholding Role Information

Share information will only apply to subscribers (prior to incorporation) or members of companies. The number and type of shares that may be allocated to a particular member depends on the type of company that is formed.



3.6 Service response message

The service returns a standard service response message that follows the following structure.



An overview of the individual elements and the context to the AmendAssociatedParty service request is provided in the following table.

Element	Description	Notes
Result	A result object is synchronously returned for each service call.	N/A
Success	Boolean indicator if the service request was successful or not.	N/A
ServiceMessage	Service calls that result in an error will return a ServiceMessage object with supporting information.	Message Code: Indicates what the message relates to (see section 4.1 for the Message code (error types). Message Severity: If the message relates to Information, Warning, or Error etc. Message Text: A long version of the error description. Message Source: Whether the service call has failed API validation or core business logic validation. Message Value: A short version of the error description.
SubmissionReference	Upon receipt of a well-formed and valid service request, the JFSC will return a unique submission reference number.	This submission reference number is an input parameter in subsequent CheckSubmissionStatus requests.
BaseFee	N/A	No fee is associated with this service.
LateFee	N/A	No fee is associated with this service.

3.7 Message Code (errors types)

- NoPresenterSurnameProvided
- NoPresenterFirstnameProvided
- NoPresenterEmailAddressProvided
- NoEntityNumberProvided
- InternalAPIError
- ActivitySectionRequired (Static API Validation only)
- RiskSectionRequired (Static API Validation only)
- InvalidReserveNameNumber (Static API Validation only)
- InvalidSubmissionReferenceNumber
- SubmissionValidationError
- InvalidApiKey
- EntityNotInPortfolio
- FunctionNotAvailable (Temporarily used when functions are closed but still listed on the WSDL e.g. File upload, Amend Nominated Person, Company Incorporation)
- SubmissionNotMadeByCustomer

The most common error returned to users will be the “Submission Validation Error” which reflects that the service call has failed business logic validation. The message will be further elaborated in the message text. These are the same validation business rules that are applied in the myRegistry portal.