



FORWARD GROUP
Trust & Corporate Services

GUIDANCE NOTE
SUITABLE CERTIFICATION

Introduction

What is Client Due Diligence (“CDD”)?

In many jurisdictions, including Jersey, Anti-Money Laundering legislation requires firms, when taking on clients, or handling client funds, to have procedures in place to identify and verify a client’s identity.

This process is called Client Due Diligence (“CDD”) and the process is laid out by our Regulator, the Jersey Financial Services Commission (“JFSC”), in the Trust Company Business Code of Practice to which all licensed Trust Company Businesses must adhere.

To meet our obligations under the law we need to be able to demonstrate that we have identified our client, and that we have also verified that information to be correct. The way we do this is by obtaining a copy of your proof of identity, usually in the form of a passport, and another copy of a document to verify your residential address.

Obtaining a copy of these documents is the identify part of this process. The verify aspect is achieved by having a professional person or person of responsibility certify the copy of the document as being genuine and, in the case of an identity document, that it is a true likeness of the person presenting it.

Obtaining a certified copy of these documents is only a part of the process of collecting CDD documentation. In addition, we will need:

- Proof of your identity.
- Proof of your residential address.
- Proof of your Source of Wealth and Source of Funds (see separate Guidance Note on SOW and SOF).
- An understanding of the rationale for the structure for which we are providing services (see separate Guidance Note on Tax Advice).
- A letter of engagement highlighting the terms on which we provide services to you.
- A fee proposal that is referenced in your engagement letter detailing the charges for our services.

This Guidance Note relates solely to the certification requirements in relation to the **Proof of Identity** and **Proof of Address** part of the CDD process.

Who can certify documents?

To certify a document, the certifier should be a member of one of the following:

- A member of the judiciary, a senior civil servant, a serving police or customs officer;
- An officer of an embassy, consulate or high commission of the country of issue of documentary evidence of identity;
- An individual who is a member of a professional body that sets and enforces ethical standards e.g. an accountant or lawyer;
- An individual who is qualified to undertake certification services under authority of the Certification and International Trade Committee (in Jersey this service is available through the Jersey Chamber of Commerce); or
- A director, officer, or manager of:
 - i. a person carrying on a financial services business which is regulated and operates in a well-regulated country or territory; or
 - ii. a branch or subsidiary of a group headquartered in a well-regulated country or territory, which applies group standards to subsidiaries and branches worldwide and tests the application of, and compliance with, such standards.

Certifier details

The certifier should add the following information to both the proof of identity and proof of address documentation. This will allow for the certifier to be contacted in the event of any questions or where we are required to confirm that the certifier is genuine:

- Signature.
- Full name.
- Capacity in which they are signing.
- Qualification and membership number where applicable e.g. ACCA 1234, Police ID number etc.
- Professional address.
- Contact details including telephone or email address.
- Date of the certification.

Certification

The person certifying the document must certify that the copy of the document is a true copy of the original document (or extract thereof) and, for a proof of identity document, that the photograph bears a true likeness of the individual; noting that documents should only be certified if both original and photocopy are in front of the certifier at the time of certification.

We cannot accept certified copies of a certified copy, or documentation certified by the individual to whom it relates, or by family members.

Original "wet ink" copies of certified documents should be couriered to the offices of Forward Group. You are advised to send a scanned copy of the CDD documentation before posting originals in order that the certification can be checked as suitable.

Certification by digital means

We cannot accept a scanned copy of CDD and will require the original certified document to be posted. We can, however, rely on a digital certification when the following process is adhered to:

- The certifier (not the client) emails the documents to be certified to cosec@fw.je.
- The documents will be uploaded to a digital signature service appended with the required certification wording.
- The certifier will receive an email to sign and complete the certification block appended to the documents.
- Once signed, both Forward and the certifier will receive a copy of the certified documentation and a log detailing the application of the digital signature.

Proof of identity – Acceptable documents

This will be a photographic identity document issued by a government. Acceptable documents are a national identity card or a passport.

To meet the regulatory requirements:

- The document must be in date, i.e. not expired.
- The photocopy of the photograph should be clear enough to easily recognise the individual (to meet the requirements generally this would mean a good colour copy).
- The copied document should include the pages detailing the unique document number, photograph, expiry date, name, place and date of birth and signature (blank pages do not need to be included).
- If the document is in non-Latin / Roman e.g. Greek, Chinese, Arabic, Russian, etc., it should be accompanied by a certified translation from an official translator.
- The copied document should be certified using the required certification wording detailed in the sample certification.
- If the individual has more than one passport, a certified copy of each document is required.

Where this documentation is not available, for example for a child who is not in possession of a passport, please contact Forward and we will advise what alternative documentation may be accepted.

Sample - Proof of Identity Document Certification

Place your passport photographic page here and copy

I hereby certify that I have seen the original of this document and that this is a true and accurate copy of that document (or extract of that document). I also certify that the photograph contained in this document bears a true likeness to the individual that has requested certification of this document.

Signature			
Full Name			
Qualification		Professional No.	
Address		Telephone	
		Email	
		Date	

Proof of address

This must be a separate document to the proof of identity detailed above (we cannot use one document for both proof of address and identity).

Proof of address documents should be addressed to the relevant individual by name and state their full residential address, or their main residence if more than one.

Proof of address - Acceptable documents

- A utility bill for a supply to the residential address (dated within the last 3 months).
- A bank statement (dated within the last 3 months).
- A driving licence or national identity card (if not used as proof of identity).
- Correspondence from a central or local government department or agency.
- A tenancy contract or agreement.
- A letter of introduction confirming the residential address from:
 - i. a person carrying on a financial services business which is regulated and operates in a well-regulated country or territory; or
 - ii. a branch or subsidiary of a group headquartered in a well-regulated country or territory, which applies group standards to subsidiaries and branches worldwide and tests the application of, and compliance with, such standards.

Documents addressed only to a Post Office Box number are not acceptable.

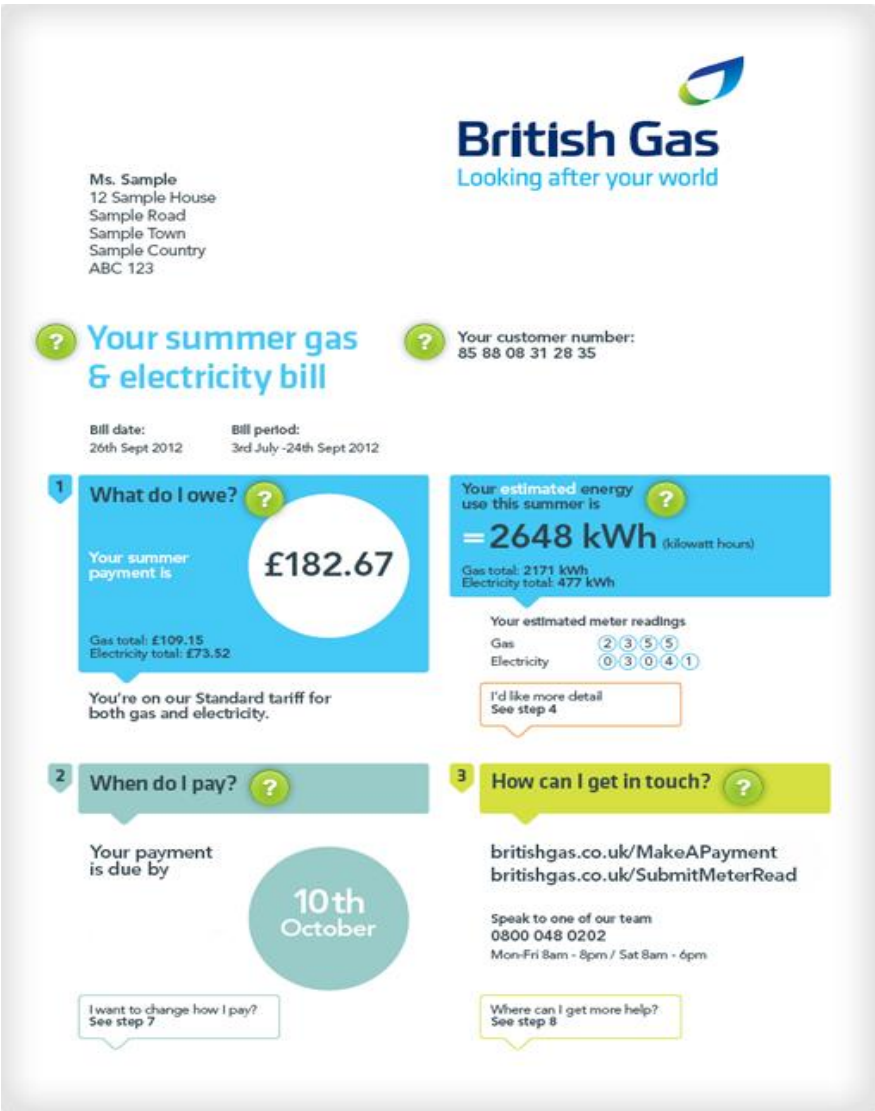
If the document is not in English, it should be accompanied by a certified translation from an official translator.

Store cards, general correspondence, receipts for heating oil and mobile phone bills are not acceptable.

Credit card statements may be used where issued by a bank, and where no exclusion is made by the issuing bank that the statement may be used as an identity document.

Documentation should preferably be the original documentation, which can be returned if requested, or certified using the required certification wording.

Sample - Proof of Address Document Certification



I hereby certify that this photocopy is a true copy of the original document.

Signature			
Full Name			
Qualification		Professional No.	
Address		Telephone	
		Email	
		Date	



FORWARD GROUP

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