

Guidance for NPO risk assessment form

Selected non-profit organisations (NPO) need to complete an online form* by **30 November** to provide us with additional information about them. This is part of Jersey's drive to combat financial crime.

The information you provide, will assist our understanding of your NPO and the non-profit sector. This will be of vital importance when we come to prepare for, and identify, future supervision/monitoring of NPOs that are considered as vulnerable NPOs (i.e. those NPOs that may be vulnerable to terrorist financing abuse).

You will note that *if the NPO has changed its name*, and you have advised us of this during the first phase of the risk assessment collection, the name remains unchanged in our documentation also during this second round of questions. This is so that we can effectively manage the entire process in-house from start-to-finish, utilising only one name.

Please bear in mind that this form has been sent to a number of NPOs with very different purposes, objectives, activities and jurisdictional touchpoints, hence we are anticipating that the answers may vary considerably and in some instances the questions may appear over-egged or unrelated to your NPO. Our focus is on gaining a better understanding of systems and controls and there may be no requirement for your NPO to have, for example, a risk assessment in place.

Our questions and work are not intended to diminish, impede or undermine the noble activities of NPOs, but rather to contribute to preserve their integrity and to reinforce public confidence in these organisations so they may continue to carry out their good work. We are not intending to test you in terms of your knowledge of reporting procedures, the law etc.

Below is an outline of what we are requesting from you so you can have the information to hand when you start to complete your form.

You will need to submit your information in one go; it cannot be resubmitted.

Make sure you complete the right form if you look after multiple NPOs.

If you want to keep a copy of the form for your records, you will need to print it using the print option in your browser before submitting to us.

Trust company businesses

If you are trust company business that administers one or more NPOs, you will need to provide your information to us by completing an Excel workbook via myJFSC.

[Log into myJFSC to submit your information.](#)

Basic information

Name of non-profit organisation (NPO): <ul style="list-style-type: none">› Registration number› Full name of non-profit organisation	<i>Auto-completed.</i> Please make sure you complete the right form if you look after multiple non-profit organisations.
Why has the NPO chosen to have a Jersey connection?	At times we have spotted, for example, that a NPO may be operating out of Jersey with very small/no amounts of funds being collected/dispensed in the Island, instead funds

	<p>are raised and distributed elsewhere. This raises the question as to why the NPO is registered here, or why it utilises the services of a trust company business in Jersey. <i>There may be perfectly acceptable reasons for this.</i></p> <p>Please let us know what the reasons are so that we can understand why there is a Jersey connection/nexus. E.g.</p> <ul style="list-style-type: none"> › Why has a Jersey trust company business been chosen to administer the NPO? › Why has Jersey been selected as the location of choice for the registration of the NPO? <p>Some of the reasons as to why Jersey has been chosen may include:</p> <ul style="list-style-type: none"> › The Founder is resident in Jersey › All the activities of the NPO are carried out in Jersey › All beneficiaries are in Jersey › Advice was received to establish the NPO in Jersey (please provide an explanation as to why the adviser suggested this would be preferable).
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<h2 style="margin: 0;">UK connection</h2>	
<p>If, in your phase one NPO risk assessment you advised us that you have a UK connection, please specify which part(s) of the UK this refers to, selecting all that are applicable</p>	<p>Multiple choice - select all that apply:</p> <ul style="list-style-type: none"> › England › Scotland › Northern Ireland › Wales.

<h2 style="margin: 0;">Risk assessments</h2>	
	<p>These risk assessment questions have been created in order to assist us in gaining a better understanding of the risk management that your NPO/the non-profit sector has in place, <i>or does not have in place</i>, at this time. This information will assist our understanding of the sector, and</p>

<p>Does the NPO have a written and up-to-date risk assessment in place which sets out the risks (threats and vulnerabilities) it may be exposed to and how they may be mitigated?</p>	<p>will be of vital importance when we come to prepare for future supervision/monitoring of non-profit organisations that are considered as vulnerable NPOs (i.e. those higher risk entities that may be vulnerable to terrorist financing abuse).</p> <p>There may be no requirement for your non-profit organisation to have a risk assessment in place.</p> <p>Yes/No</p>
<p>If the NPO has a written and up-to-date risk assessment in place, does it make reference to Jersey's National Risk Assessment for Terrorist Financing? (published in April 2021)</p>	<p>If your NPO does not have a risk assessment in place, please leave the automatic response as No.</p> <p>Yes/No</p> <p>Government publishes first national risk assessment for terrorist financing — Jersey Financial Services Commission (jerseyfsc.org)</p>
<p>If the NPO has a written and up-to-date risk assessment in place, does it include diversion risk and the value of NPO's resources or activities to a diversionary (e.g. to a terrorist/terrorist organisation, or a person sympathising with terrorists/terrorist organisations, promoting a terrorist ideology or activities, including where they are located in countries/territories where there have been no reported terrorist acts)??</p>	<p>If your NPO does not have a risk assessment in place, please leave the automatic response as No.</p> <p><i>Please bear in mind that this form has been sent to a number of non-profit organisations with very different purposes, objectives and activities, hence we are anticipating that the answers may vary considerably.</i></p> <p>Yes/No</p> <p>With diversion risk we mean any type of risk of there being a possibility that the objectives for which the NPO has been set up may not 100% materialise to successfully benefit the legitimate beneficiaries for which the funds/assets/services (donations) were intended.</p> <p>For example, there are reported cases internationally whereby a certain percentage of the funds/assets/services of the non-profit organisation, which were intended for the legitimate beneficiaries, have become “payable as a form of tax/fee”, either directly to terrorists/terrorist groups, or indirectly to those</p>

	<p>that sympathise with their cause. This “tax/fee” is suggested as payable, for example, in order for the NPO to operate unhindered in the area, or for the non-profit organisation to be allowed to pass through an area. Such tax may be gathered by different means, for example, at checkpoints and may be more common when operating in, or close to, conflict zones where vital humanitarian aid can be desperately needed.</p> <p>A conflict zone can, for example, include a land territory which is disputed, or where there is ongoing warfare, including places where factions are waging war, or civil war, against each other.</p> <p>Persons sympathising with terrorists/terrorist organisations and terrorists and terrorist organisations may be located in countries/territories where there have been no reported terrorist acts.</p>
<p>If the NPO has a written and up-to-date risk assessment in place, does it consider the local context in areas where the NPO operates?</p>	<p>If your NPO does not have a risk assessment in place, please leave the automatic response as No.</p> <p><i>Please bear in mind that this form has been sent to a number of NPOs with very different purposes, objectives and activities, hence we are anticipating that the answers may vary considerably.</i></p> <p>Multiple choice – may select more than one answer:</p> <ul style="list-style-type: none"> › No › Yes, it considers local infrastructure › Yes, it considers power dynamics › Yes, it considers local need › Yes, it considers proximity to terrorists, terrorist organisations and their sympathiser › Yes, it considers whether the non-profit organisation, or any Partner it works with, operate(s) in or close to a conflict zone.

Systems and controls (including policies and procedures)*

*Please note that these systems and controls may include those of the Jersey trust company business that is administering a non-profit organisation

<p>What written policies and procedures does the NPO have in place to:</p> <ul style="list-style-type: none"> (i) deter the threat of divergence from manifesting the risk (ii) detect if the risk has materialised and (iii) respond to any materialised risk? 	<p>These system and control questions have been created in order to assist us in gaining a better understanding of the policies and procedures that your NPO/the non-profit sector has in place, <i>or does not have in place</i>, at this time. This information will assist our understanding of the sector, and will be of vital importance when we come to prepare for future supervision/monitoring of non-profit organisations that are considered as vulnerable NPOs (i.e. those higher risk entities that may be vulnerable to terrorist financing abuse).</p> <p>The questions are also a reflection of the need and want of the non-profit sector to satisfy themselves about the integrity of the persons and organisations that they are engaging, or are associated with.</p> <p><i>Please bear in mind that this form has been sent to a number of NPOs with very different purposes, objectives and activities, hence we are anticipating that the answers may vary considerably.</i></p> <p>There may be no requirement for your NPO to have a risk assessment in place.</p> <p>The NPO has the following policies and procedures in place:</p> <p>Multiple choice – select all that apply:</p> <ul style="list-style-type: none"> › The NPO has no such policies and procedures in place › Includes incident reporting › Includes an anti-diversion policy › Includes a quick response plan › Other
<p>If you have selected “Other”, please let us know what they are</p>	<p>Free text – max 300 characters</p>
<p>If funds are being disbursed abroad*, especially to conflict zones or close to such conflict zones, are there additional safeguards in place (e.g. enhanced monitoring and supervision procedures)?</p> <p>* The term abroad includes countries forming part of the United Kingdom</p>	<p>Yes/No</p>

<p>If you have selected “yes”, what additional safeguards are in place?</p>	<p>Free text – max 300 characters</p> <p>[Please also add information in this answer box, if any of the question below do not apply to your NPO, explaining why]</p>
<p>What screening/vetting/due diligence is undertaken in terms of the non-profit organisation's Board/Senior management and Officer(s)? Please select all that apply</p>	<p>Multiple choice – please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Copy passport/identification document › Copy utility bill › Police checks › Verification of previous experience (e.g. obtaining references/curriculum vitae) › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Obtaining assurances that the person is not a member of an organisation mentioned in the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Other checks
<p>What screening/vetting/due diligence is undertaken in terms of the non-profit organisation's Trustee(s)? Please select all that apply</p>	<p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Copy passport/identification document › Copy utility bill › Police checks › Verification of previous experience (e.g. obtaining references/curriculum vitae) › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Obtaining assurances that the trustee is not a member of an organisation mentioned in the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Other checks.

<p>What screening/vetting/due diligence is undertaken in terms of the NPO's Beneficial owner(s) and Controller(s)? Please select all that apply</p>	<p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Copy passport/identification document › Copy utility bill › Police checks › Verification of previous experience (e.g. obtaining references/curriculum vitae) › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Obtaining assurances that the person is not a member of an organisation mentioned in the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Other checks.
<p>What screening/vetting/due diligence is undertaken in terms of the NPO's Staff/Volunteer(s)? Please select all that apply</p>	<p>We appreciate that the answer to this question can be very different in terms of where staff are engaged, their seniority and their location.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Police checks › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Obtaining assurances that the person is not a member of an organisation mentioned in the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Other checks.
	<p>It is not unusual for NPOS to work with local Partners (in partnership with) in order to, more effectively, carry out the organisations objectives, for example by increasing capability and capacity. Partners can take many different forms, by way of</p>

<p>What screening/vetting/due diligence is undertaken in terms of the NPO's Partners, including their Beneficial Owners, Controllers and associates? Please select all that apply</p>	<p>example, a Jersey non-profit organisation may (i) work closely with another charity or NPO when providing humanitarian aid abroad, (ii) engage with Partners that can assist with logistics/security, or (iii) chose to work closely with a Partner for any other reasons.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › We don't work with any partners › No checks are undertaken › Police checks › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Checks against the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Obtaining assurances that the person is not a member of an organisation mentioned in the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Research a partners track record for delivering on projects › Consulting with other non-profit organisations/charities that may have worked with the partner › Verifying that the partner complies with legislative/regulatory requirements in their own country › Other checks.
<p>How many non-Jersey residents form part of the NPO's Board/Senior management and Officer(s)?</p>	<p>Drop down – numeric</p>
<p>If there are non-Jersey residents acting as Board/senior management and officer(s), which countries are they from?</p>	<p>Drop down – countries list</p>
<p>How many non-Jersey residents form part of the NPO's Trustee(s)?</p>	<p>Drop down – numeric</p>
<p>If there are non-Jersey residents acting as Trustee(s), which countries are they from?</p>	<p>Drop down – countries list</p>

How many non-Jersey residents form part of the NPO's Beneficial owner(s) and Controller(s) ?	Drop down – numeric
If there are non-Jersey residents acting as Beneficial owner(s) and Controller(s), which countries are they from?	Drop down – countries list
How many non-Jersey residents form part of the NPO's Staff/volunteer(s) ?	Drop down – numeric
If there are non-Jersey residents acting as Staff/Volunteer(s), which countries are they from?	Drop down – countries list
How are your non-Jersey Partners selected?	<p>Please write “N/A” if you do not work with any Partners.</p> <p>It is not unusual for NPOs to work with local Partners (in partnership with) in order to, more effectively, carry out the organisations objectives, for example by increasing capability and capacity. Partners can take many different forms, by way of example, a Jersey non-profit organisation may (i) work closely with another charity or non-profit organisation when providing humanitarian aid abroad, (ii) engage with Partners that can assist with logistics/security, or (iii) chose to work closely with a Partner for any other reasons.</p> <p>Free text – max 300 characters</p>
What controls are in place in order to ensure that your non-Jersey Partners are undertaking work only in line with your expectations and agreements (e.g. ensuring that donations only are made to legitimate beneficiaries only)? Please select all that apply	<p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › We enter into contract clearly setting out the terms of engagement › We undertake spot checks to verify › Other checks.
What screening/vetting/due diligence is undertaken in terms of non-Jersey based beneficiaries? Please select all that apply	<p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List <a 790="" 879="" 934="" 950"="" data-label="Page-Footer" href="https://www.gov.uk/government/publications/financial- </td> </tr> </table> </div> <div data-bbox="> <p>Page 9 of 14</p>

	<p>sanctions-consolidated-list-of-targets/consolidated-list-of-targets)</p> <ul style="list-style-type: none"> › Checks against the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Other checks
<p>How are non-Jersey based beneficiaries selected?</p>	<p>Free text – max 300 characters</p>
<p>What screening/vetting/due diligence is undertaken in terms of parties providing services to the NPO? E.g. vendors, suppliers and consultants. Please select all that apply</p>	<p>We are looking for information in terms of any non-Jersey resident service providers only.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken [Please tick this box if the question is not applying to your NPO and add further detail in the free text section above that speaks of safeguards] › Police checks › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List <a #"="" href="https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets)) › Checks against the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Obtaining assurances that the person is not a member of an organisation mentioned in the UK proscribed terrorist › Open source/Google searches › Credit checks › Other checks.
	<p>The ability to follow the audit trail for criminal funds and transactions is a vital law enforcement tool for not just money laundering purposes, but also for financing of terrorism investigations. Understanding the identity of and, at times, the source of funds of, <i>material</i> Donors (i.e. not every Donor) can assist in this respect. Material Donors include, for example, Donors that provide substantial funding to the NPO.</p> <p>In times of hardship, this may also mean that the non-profit organisation may come to rely upon the <i>material</i> Donor’s funding in order for the organisation to continue with its activities.</p> <p>Source of funds, e.g. the nature and details of occupation or employment. It is the activity that generates the funds for the Donor that is of relevance. Information concerning the</p>

<p>What checks are undertaken in terms of <i>material</i> Donor's identity?</p>	<p>geographical sphere of the activities that has generated the funds may also be relevant.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) › Checks against the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Other checks › We don't have any material donor(s).
<p>What checks are undertaken in terms of a <i>material</i> Donor potentially being connected to a higher risk jurisdiction(s)?</p>	<p>Examples of higher risk jurisdictions can be found in Appendix D1 appendix-d1-22102021.pdf (jerseyfsc.org) and D2 appendix-d2-22102021.pdf (jerseyfsc.org) of the Jersey Financial Services Commission's AML/CFT Handbook.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken › Open source/Google searches › Other checks › We don't have any <i>material</i> Donor(s).
<p>What checks are undertaken in terms of <i>material</i> Donor's source of funds?</p>	<p>The ability to follow the audit trail for criminal funds and transactions is a vital law enforcement tool for not just money laundering purposes, but also for financing of terrorism investigations. Understanding the identity of and, at times, the source of funds of, <i>material</i> Donors (i.e. not every Donor) can assist in this respect.</p> <p>Source of funds, e.g. the nature and details of occupation or employment. It is the activity that generates the funds for the Donor that is of relevance. Information concerning the geographical sphere of the activities that has generated the funds may also be relevant.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › No checks are undertaken › Requesting where funds emanate from › Sanctions checks (against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list and the OFSI Consolidated List https://www.gov.uk/government/publications/financial-

	<p>sanctions-consolidated-list-of-targets/consolidated-list-of-targets)</p> <ul style="list-style-type: none"> › Checks against the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Open source/Google searches › Asking questions as to whether funds emanate from crowdfunding activities › Other checks › We don't have any <i>material</i> Donor(s).
Other (free text)	<p>If answer "No checks are undertaken" or "Other checks" in the question above, provide a further explanation in the Free text field marked "Other"</p> <p>Free text – max 300 characters</p>
If the NPO has collected funds/assets/services which are being disbursed to a third party, what controls are in place to ensure that the non-profit organisation's funds/assets/services/reputation are safeguarded and reach their intended destination/legitimate beneficiaries?	Free text – max 300 characters
Does the NPO provide its staff (also including its Board/senior management/volunteers) with anti-diversion training?	Yes/No
If yes, how often is the training provided?	<p>If your NPO does not provide anti-diversion training, please leave the automatic response as No.</p> <p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › Upon recruitment › Annually › Less frequently than annually.
How does the NPO keep itself aware of potential sanctions applying or proscribed parties operating?	<p>Multiple choice - please select all that apply:</p> <ul style="list-style-type: none"> › Automated screening against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list, the OFSI Consolidated List https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets and the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Manual screening against the UK Sanctions List: https://www.gov.uk/government/publications/the-uk-sanctions-list, the OFSI Consolidated List https://www.gov.uk/government/publications/financial-

	sanctions-consolidated-list-of-targets/consolidated-list-of-targets and the UK proscribed terrorist groups or organisations list: Proscribed terrorist groups or organisations - GOV.UK (www.gov.uk) › Other.
If Other, please explain how	Free text – max 300 characters

Reporting of suspicious activities/transactions and suspicious sanctions breaches

Who should suspicions of crimes, such as money laundering and terrorist financing, be reported to?	<p>This question may appear as an “online training test”, however, this is not the intention. Instead, your answer will assist us when considering future guidance and training needs.</p> <p>Drop down (multiple choice) - please select all that apply:</p> <ul style="list-style-type: none"> › N/A - Not required to report suspicions of crime › The Minister for External Relations and Financial Services › The Joint Financial Crimes Unit (an arm of the States of Jersey Police) › The Jersey Financial Services Commission › The Jersey Charities Commissioner.
Who should you report it to if you have been approached by a sanctioned person, or by a party acting for and on behalf of a sanctioned person, or if you suspect that sanctions legislation may have been breached?	<p>This question may appear as an “online training test”, however, this is not the intention. Instead, your answer will assist us when considering future guidance and training needs.</p> <p>Drop down (multiple choice) - please select all that apply:</p> <ul style="list-style-type: none"> › N/A - Not required to report suspicions of crime › The Minister for External Relations and Financial Services › The Joint Financial Crimes Unit (an arm of the States of Jersey Police) › The Jersey Financial Services Commission › The Jersey Charities Commissioner

Financial statements, financial records and audit

Does the NPO produce annual financial statements?	Yes/No
Does the NPO have an auditor to review its financial statements or financial records?	Yes/No
If an auditor has been used, has there ever been any issues identified as part of an audit?	We are looking for any issues identified during 2018, 2019 and 2020 only. Yes/No
If there ever has been any issues identified, please describe the issue(s)	We are looking for any issues identified during 2018, 2019 and 2020 only. If there has not been any issues identified in that period, please write N/A. Free text – max 300 characters
If an auditor has been used, is the auditor regulated or supervised by a recognised trade body or regulator?	Yes/No/I don't know
If yes, who is the auditor regulated or supervised by?	Free text – max 300 characters