



SERVICE STANDARDS AND PERFORMANCE ACCOUNTABILITY

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ACRONYMS

The following acronyms may be used in this policy:

AML.....	Anti-Money Laundering
BOSS.....	Beneficial Owner Secure Search System
CFT.....	Combating the Financing of Terrorism
SAR.....	Suspicious Activity Report
DOI.....	Disclosure of Information
MLA.....	Mutual Legal Assistance
LOR.....	Letter of Request
MOU.....	Memorandum of Understanding
HR	Human Resources
COO.....	Chief Operating Officer
RFI.....	Request for Information
NPO.....	Non-Profit Organisation

INTRODUCTION

The Financial Investigation Agency (the "Agency") has established this Service Standards and Performance Accountability policy to measure service standards within the Agency. This policy will enable the Agency's Board of Directors and Senior Management to evaluate its performance against its delivery of its core functions as set out in the Financial Investigation Agency Act, 2003 and other relevant legislation. This policy will also keep the Agency's counterparts and stakeholders informed about the level of service they should expect from the Agency. As a consequence, this policy will be shared with the various stakeholders by being published on the Agency's website.

The service standards included in this policy relate to a number of activities undertaken by the Agency in its capacity as the Territories' financial intelligence unit and supervisor of non-profit organisations (NPOs) and designated non-financial businesses and professions (DNFBPs) for AML/CFT compliance. These activities require that work be completed in a timely and efficient manner in order to meet stakeholder expectations.

These service standards will work to increase efficiency and provide management with indicators that can identify processes that require review in order to improve effectiveness and responsiveness within the Agency.

SERVICE STANDARDS

Response Times:

The Agency serves as the receiver and processing unit for a number of documents related to the Territory's AML/CFT regulatory framework and international cooperation regime. Efficiency and timeliness are crucial. Through this policy, the Agency commits to timely acknowledgment and processing of the following:

- Suspicious Activity Reports (SAR) submitted by financial institutions and registered agents.
- Requests for Information (RFI) from local and foreign law enforcement agencies.
- Requests for Information (RFI) from foreign financial intelligence units
- Disclosures of Information (DOI) from foreign or domestic law enforcement authorities; regulatory bodies; financial intelligence units; individuals or other sources.
- Mutual legal assistance (MLA) requests from foreign judicial authorities.

- Receipt of compliance manuals from entities that fall under the Agency's AML/CFT supervisory remit including NPOs and DNFBPs.
- Requests for an extension for submission of regulatory or statutory requirements.
- Requests for consent to act in aid of a Law Enforcement function
- On-site inspection reports.
- Complaints made against the Agency.
- Application for employment.
- General email enquiries received.

A complete list of the Agency's response time standards appears at the Appendix.

Professionalism:

Through this policy, the Agency also endeavours to measure the professionalism and courtesy extended by its staff:

- to visitors who visit the Agency's office for scheduled and unscheduled appointments;
- to employees of supervised entities where the Agency conducts on-site compliance inspections; and
- in telephone conversations in the conduct of Agency's business.

APPENDIX

Action	Unit	Decision-Maker	Time Frame*
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Law Enforcement

Acknowledgement of SAR	Analysis	Head of Unit	2 days
Analysis of SAR	Analysis	Analysts	30 Days
Provide feedback on SAR	Analysis	Head of Unit/Director	30 days
Acknowledgement of RFI	Intelligence	Head of Unit	2 days
Respond to RFI	Intelligence	Intelligence Officer	15 days
Acknowledgement of DOI	Investigating	Head of Unit	2 days
Provide feedback on DOI	Investigating	Head of Unit	30 Days
Acknowledgment of MLA/LOR	Investigating	Head of Unit	2 days
Respond to MLA/LOR	Investigating	Investigating Officer	10-14 days
Acknowledgement of BOSSS Requests	Investigating	Head of Unit	24 Hours
Respond to BOSSS Requests	Investigating	Investigating Officer	24 Hours

Supervisory

Acknowledgment of Compliance Manual	Compliance	Head of Unit	2 days
Provide feedback on Compliance manual	Compliance	Head of Unit/Legal	30 days
Respond to extension request	All	Head of Unit/Director	2 days
On-site inspection report	Compliance	Head of Unit/Examiners	30 days
Provide feedback on Onsite Inspection Report	Compliance	Head of Unit	40 Days

General

Acknowledgement of complaint	Operations	COO/Director	2 days
Respond to complaint (if necessary)	Operations	COO/Director	7 days
Acknowledge general email enquiries	Operations	COO	2 days
Acknowledgement of Request for MOU	Administration	Director	2 Days
Respond to Request for MOU	Administration	Director/Legal	21 Days
Acknowledgement of Application	HR	HR Manager	2 Days
Respond to Application	HR	HR Manager	14 Days
Acknowledgement of Request for Consent to act in aid of a Law Enforcement function	Administration	Director/Deputy	2 Days
Respond to Request for Consent to Act	Administration	Director/Deputy	14 Days

* Business days