



Anti-money laundering and combatting the financing of terrorism (AML/CFT)

High-Value Dealers (HVDs) Survey 2017

Purpose of this survey

The Office of Fair Trading has been appointed as a supervisory authority under the Proceeds of Crime ACT 2015 (POCA). The OFT is required to monitor compliance by HVDs with AML/CFT obligations set out in the POCA. In order to set appropriate regulatory measures in place it is collecting information from HVDs and businesses who are open to accepting large cash payments.

Purposes for which data is collected and processed

The OFT will be analysing the information submitted in this survey in order to obtain data about how HVDs operate and to determine the current level of awareness by HVDs of AML/CFT matters. This information will be used to put systems in place to effectively regulate HVDs.

The OFT will not take AML/CFT enforcement action as a direct result of information obtained from this survey, but it may note a failure to respond to this survey as an indicator of non-compliance with AML/CFT and other requirements.

Data processing and sharing

All personal data collected as part of this survey shall be processed by the OFT in compliance with data protection and other relevant legislation for the purposes of carrying out the OFT's regulatory functions.

In order to maximise engagement and cooperation with other regulatory and enforcements entities, the OFT may share the data submitted in this Survey to other regulators or law enforcement agencies for statistical purposes in relation to compliance by businesses with AML/CFT requirements generally and for the deterrence of criminal activity.

Consent

By submitting this information you hereby consent to the processing of the data submitted and the sharing of information by the OFT with other regulatory and enforcement authorities.



Who should complete the survey?

This survey should be completed by the manager/director of the business.

If you do not consider the business to be a HVD, you have the opportunity to state reasons for your views at the bottom of the survey. The definition of a HVD is set out in the HVD Guidance Notes which can be found on the OFT's website: <http://www.oft.gov.gi/index.php/aml-cft>.

If your business is open to receiving cash payments equal to, or higher than, £8,000 please complete this survey whether the business is a HVD or not.

Survey

Fill in this survey carefully to the best of your ability. Should the information not fit in space provide use a separate sheet. If you have any questions or queries about any of the information requested please do not hesitate to contact us.

Business Details

1	Business name:	
2	Business address:	
3	e-mail address:	
4	Telephone No.:	
5	Business License No.: Or details of other licence/registration.	
6	Nature of Business:	
7	How long has the Business been operational for?	
8	Director(s)/Manager(s): Please provide name(s) and contact details of the person(s) who runs the business.	
9	Shareholder(s) / Owners(s): Please provide name(s) and contact details of the beneficial owner(s) of the business.	

Receiving payments in cash (excluding card payments and bank transfers)

10	What percentage of payments received are in cash?	
11	What does the business consider to be a large cash payment?	
12	Does the business receive large cash payments? If so, how often?	
13	How many cash payments above £8,000 does the business receive annually?	
14	Are large cash payments normally made by regular or new customers?	
15	Are records of large cash transactions kept? Please provide details:	
16	Is customer due diligence carried out before receiving large cash payments? (see 3.4 in HVD Guidance Notes) Please provide details:	

Employees

17	Number of employees:	
18	Have employees received any anti-money laundering training? Please provide details:	
19	Have employees ever identified any conduct that may indicate the business is being used to launder money? Please provide details:	
20	Is there a nominated anti-money laundering compliance officer?	



Not a High-Value Dealer?

The definition of a HVD is set out in the HVD Guidance Notes on the OFT's website: <http://www.ofg.gov.gi/index.php/aml-cft>. If you do not consider the business to be a HVD please state reasons for your views below.

If your business is open to receiving cash payments equal to, or higher than, £8,000 please complete this survey even if the business is not a HVD.

Signature

I hereby confirm that I have completed this survey to the best of my knowledge and ability and that the information contained herein is correct and not misleading:

Date: _____

Signature: _____

Name: _____

Director / Manager
(delete as appropriate)

Please submit the completed and signed survey to the OFT:

1. by post to:
Office of Fair Trading
Suites 975
Europort;
2. by e-mail to: business.support@gibraltar.gov.gi
3. at the OFT's public counter at Suites 975, Europort.