TCC

020 3772 7230
hello@tcc.group
tcc.group

CASE STUDY

AML customer due diligence review

The challenge

A leading global bank was coming under regulatory scrutiny on its AML processes. To understand the scope of the problem and ensure it could stand up against the FCA investigation, we recommended the bank review its customer due diligence procedures. Independent assurance was a must in this case. Trusting our expertise, our client asked us to undertake a comprehensive review.

The solution

Due to our deep understanding of the FCA standards, we knew our review needed to consider both the initial customer due diligence undertaken and also the process for monitoring the ongoing client relationship and transactions. We took a phased approach:

- **Phase one** – We started by reviewing past cases to find out whether our client was collecting sufficient information. Did our client fully understand their customer intentions? Had they properly verified identities, including identifying the beneficial owner(s)? Do they enter into, or continue, relationships even if they can't conduct customer due diligence?

- **Phase two** – We reviewed the customer due diligence procedures and processes, testing them against what we were seeing in practice. In particular, we wanted to know whether the procedures were flexible enough to cope with customers who needed enhanced due diligence, such as PEPs or those who can't provide the most common forms of ID.

We left no stone unturned. And thanks to the depth of our review, our client had a complete view of their customer due diligence processes, inherent weaknesses, and the outcomes they resulted in.

We then suggested a number of improvements they could make to ensure their processes could stand up to regulatory scrutiny and reduce risk.

The TCC difference

- We're experts in FCA regulation. We used our in-depth knowledge to target the areas we know the FCA cares most about, uncovering areas for improvement in the most efficient way possible.
- Thanks to our comprehensive review, our client gained a true picture of the risks of inadequate customer due diligence, plus steps they could take to reduce it. Ultimately, this means less chance of falling foul to money laundering and regulatory action.

TCC