#### WEBINAR

# **KYC** remediation

don't let outdated customer information expose your business to risk

with **David Deane** banking industry advisor to **encompass** 

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## Housekeeping











## **Today's Speaker**



David Deane CEO OPSMATiX

- CEO OPSMATiX Ltd : Intelligent Process Automation Technology Company
- Industry Advisor Encompass Corporation

- Formerly Global Head (MD) Client & Data Services
  Tier 1 Bank
  - Client On-Boarding / KYC Due Diligence
  - Established Global KYC Remediation Programme

A 'loose' definition;

# "the cleaning up of a mess"

- Remediation in context is the large scale cleansing and correction of client KYC files and related Data to bring them up to Regulatory and Enterprise standards
- Usually results in the wholesale 'repapering' or re-performance of KYC Due Diligence to a new standard, and acquisition of new data elements

#### Genesis

- **Regulatory Bite 2010** KYC becomes the top of most CEO's agendas
- New Regulations for Client & Tax Classification;
  - Dodd Frank, EMIR, FATCA, CRS, MiFID2 etc...
- Policies / Risk methodologies / Process / Data Sources often found to not be fit for purpose
- Duplicate / Incomplete KYC files  $\rightarrow$  Lack of Confidence
- Bad Data / Poor Housekeeping / Multiple-duplication / No Proactive Offboarding





### Reaction

- Panic! unprecedented Regulatory Fines and Pressure
- Rush to satisfy Regulators needs led to large scale over-commitment
- Existing organisations split to meet dual needs of RtB and new

formed Remediation programmes

- Teams quickly retrained in existing KYC policies and procedures
- Large scale data remediation programmes commenced



#### Result

• Firms try to solve themselves, underestimating effort & Run the Bank (RtB) impact



- Firms **inadequately informed** on potential solution providers ie. encompass
- Multiple false starts
- KYC remediation gets combined with Reg and Tax Classification collection
- Common mistakes;
  - Inadequate attention to ensuring policies are updated correctly
  - Inadequate staff training
  - Same process, same people, same result
  - Inadequate preparation in Sales / RM, needs dedicated and committed teams to manage client interfaces / doc collection

### **Solutions**

- Big 4 Set up Remediation factories in Near / Off-shore ie
- Accenture Newcastle & Mumbai
- PWC Belfast & Poland
- BPO's Set up Offshore Remediation factories
- Leverage own tech (usually) and lots of poorly trained, high attrition people
- Utilities Reinvented after poor progress in New / PR processes
- KYC.com IHS Markit & Genpact
- Thompson Reuters Combo of Clarient & KYC as a service



#### **Success**

- Policy and **Risk Methodology is up to date**, considers 4 & 5MLD
- Senior / Board level sponsorship long, tough & expensive journey ahead
- Be realistic, not heroic about time & effort required, Regulators do understand
- Understand your end to end process and who can help along the way ie Encompass
- Select your partners wisely, ensure that they do have **experience and capability**, test it and don't just take their word for it
- You need to be organised front to back, not just the Remediation team;
- Account Owners
- Client Outreach
- Compliance Capacity
- Offboarding those that fail to meet new KYC standards, or generate insufficient revenues need to be offboarded

# any questions?

thank you!

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