

Remediated risk in tier 1 wholesale bank

How we helped a Tier 1 wholesale bank improve their KYC remediation process and develop a more efficient operations framework in relation to AML compliance.



With increasing regulatory pressure relating to AML, organisations must have robust policies and procedures in place, as well as highly skilled staff, in order to effectively mitigate the risks associated with financial crime.

Challenge

The bank sought EFI's help to deal with complicated, multi-jurisdictional client files where the KYC had expired. After being reviewed by external auditors, it was identified that these client files were under the bank's required threshold. The Regulator was aware of the problem and expected a remediation plan to be implemented immediately. The bank's internal team was under-resourced, compounded by the fact that the existing team were relatively new to the business and needed more specialised knowledge to uplift the files.

Solution

Our team of experts were swiftly deployed to conduct data analysis and understand the population that needed to be remediated. We engaged with all relevant stakeholders to ensure we truly understood the challenges they faced and the expected outcomes. Effective engagement with stakeholders ensured that we:

- Clearly understood the bank's requirements
- Understood the external audit findings and the Regulator's key concerns
- Agreed an effective delivery plan and governance model
- Defined a realistic timeline for completion
- Formulated an appropriate response to the Regulator

We mobilised a small initiation team, who worked with the bank to:

- review their policies and procedures;
- determine the training schedule for our team; and
- understand the bank's specific AML framework

We implemented our bespoke approach to support the team's workflow and gather relevant management information. This ensured that the client had clear visibility of progress throughout the project and could confidently communicate this progress with the Regulator.

We benchmarked the data collected against the industry standards and re-evaluated the delivery timeline. Our analysis showed that our initial team consisting of 50 people could be reduced to 45, resulting in cost savings and process improvements for the bank.

"The team at EFI helped us understand KYC requirements from a regulatory point of view."

Outcomes

EFI's efficient approach, together with strong engagement from the bank achieved the following results:

01

Major milestones and deadlines were agreed and communicated effectively by the bank to the Regulator

02

The original timeline agreed with the Regulator was met

03

The bank's original remediation process was improved

04

Quality improvements were implemented using our operational knowledge

05

Following the success of the project the bank has asked for continued support from our teams