# remplate for comments

ECB Guide to fit and proper assessments and fit and proper Questionnaire

Institution/Company		
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Contact person		
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Surname		

Heywood

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### **General comments**

As noted in our comments to the F&P questionnaire, we recommend a stronger emphasis on AML/CFT requirements, taking a "fit for future" approach that takes into account both the ambitions set out in the EU AML Package presented in July 2021 by the European Commission and the need for policy coherence across EU institutions in order to strengthen systemic defenses.

# **Template for comments**

ECB Guide to fit and proper assessments

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;

- you indicate the relevant chapter/subsection/paragraph/page, where appropriate;

- you indicate under "Type of comment" whether your comment is a proposed amendment, clarification or deletion.

Deadline:

Midnight of 2 August 2021

ID	Chapter	Section	Paragraph	IPade	Type of comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
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# **Template for comments**

## Fit and proper Questionnaire

### Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;

- you indicate the relevant section/question/page, where appropriate;
- you indicate under "Type of comment" whether your comment is a proposed amendment, clarification or deletion.

#### Deadline: Midnight of 2 August 2021

ID	Section	Question	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
	1. Identity of the supervised entity and appointee	E	7	Clarification	"harmonised risk assessment methodology" to be used by supervisory authoriities in order to	Ensuring policy coherence across existing and future European public authorities with responsibilities for AML/CFT is critical to increase systemic resilience to money laundering threats.	Heywood, Max	Publish
2	3. Experience	G	14	Amendment	terrorist financing". The proposed amendment is to make training in the field of prevention of money laundering and terrorist financing a standalone option on the list, and to include explicit reference in the training content both to the Risk-Based Approach which is the cornerstone of the	The risk of framing anti-money laundering training as a legal and regulatory requirement is that it will result in a box-ticking approach to this area, potentially exposing financial institutions and the financial system as whole to high levels of risk. Senior managers need to have a holistic and risk-based understanding of the latest guidance, technology and policy in order to effectively contribute to the strengthening of anti-money laundering systems.	Heywood, Max	Publish
3	3. Experience	E	12	Amendment	experience with working towards achieving AML outcomes (effectiveness).	The risk of framing anti-money laundering training as a legal and regulatory requirement is that it will result in a box-ticking approach to this area, potentially exposing financial institutions and the financial system as whole to high levels of risk. Senior managers need to have a holistic and risk-based understanding of the latest guidance, technology and policy in order to effectively contribute to the strengthening of anti-money laundering systems.	Heywood, Max	Publish
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