



Frequently Asked Questions

Employee Screening Procedures

Q1 What are the employee screening requirements for trust or company service provider (“TCSP”) licensees?

Answer: TCSP licensees must assess the risk of money laundering and/or terrorist financing (“ML/TF”) of their businesses, develop and implement policies, procedures and controls on employee screening procedures. TCSP licensees must also have appropriate screening procedures in order to be satisfied of the integrity of any new employees.

Q2 When should a TCSP licensee conduct employee screening and how should it be done?

Answer: Employee screening should be conducted at the recruitment stage (before the employees are appointed to their role) and on an ongoing basis.

Good ethical behaviour should be required of all levels of employees within a TCSP licensee. Employees of the licensee should act with integrity in carrying out their role and responsibilities. Recruitment and performance appraisal systems for employees should be designed so as to include integrity as a key assessment factor. The level of assessment should be proportionate to their role in the licensee and the ML/TF risks they may encounter.