



BUSINESS REQUIREMENTS DOCUMENT

PREVENTION OF UNAUTHORISED PND REMOVAL

Author:	Compliance Group
User Group:	Compliance Group
Sponsor:	Chief Compliance Officer
Project Manager:	Ibukunoluwa Tijani
Status:	
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INTRODUCTION

There is need to control the way that Post No Debit (PND) is being lifted from Accounts which were restricted based on Court Order, Regulatory Instruction, Accounts without BVN and Law Enforcement.

CBA should create some specific 'Reasons' and 'Functionalities' in the PND module on Flexcube that when selected in the process of placing a PND, could only be lifted by Conduct and Compliance Team members alone.

Business Purpose, Objectives and Goals

Amongst other things, the objectives of the project include:

1. To ensure that Regulatory, Law Enforcement and Court Orders are complied with.
2. Helps Compliance Group to adequately monitor accounts with incomplete documentation and accounts without BVN.
3. Prevents unauthorised PND removal.
4. Protect the bank from sanctions, fines and penalties.
5. Help the bank against litigation risk

BRD Category

This section describes the purpose of the Business Requirements. Check the boxes as appropriate.

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- Business requirements for enhancements to an existing application.
- Business requirements for new application development.
- Business requirements for replacement of an existing application.
- Business requirements for a Request for Proposals/Quote (RFP/RFQ).

PROBLEM / OPPORTUNITY STATEMENT

THE NEED TO	To ensure that Regulatory Restriction orders, Law Enforcement and Court Orders including Garnishee Order are fully complied with.
AFFECTS	All Compliance Staff and Branch Services.
THE IMPACT OF WHICH IS	To restrict the removal/lifting as directed by CBN, NFIU, NDIC, EFCC, NPF, Court Order, Garnishee Order , and other Regulatory/LEA to Conduct and Compliance Team members only.

**A SUCCESSFUL SOLUTION
WOULD**

Make available additional 'Reasons' and Special Functionalities' in the PND module on Flexcube that address Regulatory/Statutory issues such as **CBN, NFIU, NDIC, EFCC, NPF, Court Order, Garnishee, Accounts without BVN and Accounts with Incomplete Documentation.**

PROJECT SCOPE

The scope of the project is defined within the limits:

FUNCTIONALITIES OF THE NEW SYSTEM

The proposed service is expected to have the under listed functionalities:

1. Customize some '**PND Reasons**' to Compliance and once selected while placing the PND, would require Compliance team to lift.
2. Restrict other staff from lifting PND that were placed using those 'Reasons and Special Functionalities' customised for Conduct and Compliance Team.
3. A Compliance staff should have dual rights which would enable him input while another authorises or authorises while another compliance staff inputs. However, he/she should not be able to authorise what he/she has inputted.

USER GROUPS IMPACTED

The structure of the Application recognises three (3) broad categories of users on this platform, based on the level of users access rights granted:

S/N	USER CLASSES	DESCRIPTION	ROLE/FUNCTION
1.	Inputter/Authoriser	Compliance Team members	General user group
2.	Inputter/Authoriser	Branch Services	General user group
3.	Super Admin	CBA Support	Request Creation and Support

USER EXPECTATIONS

S/N	EXPECTATION
1.	Prevent unauthorised removal of PND placed at the instance of Regulators/Court/LEA or due to KYC exceptions.
2.	Helps Conduct and Compliance Group to adequately monitor PND that are under their purview.

AS-IS PROCESS FLOW

Detail the current process step-by step below			
PROC STEP	DESCRIPTION	RESPONSIBILITY	PROCESS OUTPUT
(1)			
1.	Inputter Log in to Core Banking App (Compliance or Branch Service staff)		
2.	Navigate using the Menu Option: STDSTCHN		
3.	Select 'Reason' to place account on PND.		
4.	An Authoriser logged in to authorise the Inputter's pending work (Compliance or Branch Service staff)		
5.	Authorises PND with Compliance related 'reason'		
	Lifting of PND		
6.	Attempt to lift PND with compliance related 'reason' (Compliance or Branch Service staff)		
7.	Both the Compliance and Branch Service Staff the right to lift PND on Compliance related freeze (with Compliance 'reason')		

DETAILED TO-BE PROCESS FLOW

Detail the process step-by step below			
PROC STEP	DESCRIPTION	RESPONSIBILITY	PROCESS OUTPUT
	Adding PND with Compliance reasons		
1.	Inputter Log in to Core Banking App (Compliance or Branch Service staff)	Inputter	
2.	Navigate using the Menu Option: STDSTCHN	Inputter	
3.	Select a 'Reason' which is Compliance/Regulatory related.	Inputter	
4.	An Authoriser logged in to authorise the Inputter's pending work (Compliance or Branch Service staff)	Inputter	
5.	Authorises PND with Compliance related 'reason'	Inputter	
	Lifting PND with Compliance Reasons	Inputter	

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7.	Deny Branch Service Staff the right to lift PND on Compliance related freeze (with Compliance 'reason')	Admin	
8.	Grant Compliance Team members (only) the right to lift PND on Compliance related freeze (with Compliance 'reason')	Admin	
9	When a branch staff attempts to lift a PND with the identified Compliance reasons, system should throw an error message 'Privilege not available. Contact Compliance'	System	
	Lifting of PND with Compliance Customised Reasons		
10	Branch User attempts to lift a PND	Branch user	
11	System checks if it was placed by a Compliance officer. If yes, system declines with 'Privilege not available. Contact Compliance'	System	
12	Only Compliance officers can lift PND placed by another compliance officer. All compliance officers should be able to lift and authorize PNDs.		

FUNCTIONAL REQUIREMENTS







FUNCTIONAL REQUIREMENTS					
S/No	REQUIREMENTS	M	D	O	COMMENTS
1.	The existing workflows must be developed as detailed above	x			
2.	Create specific PND 'reasons' based on CBN, FIRS, NFIU, NDIC, EFCC, NPF, Court Order, Accounts without BVN and Incomplete Documentation. Exclude the possibility of lifting PND on these reasons to Conduct and Compliance Team only	x			
3.	Application must identify Compliance Staff sign-on and grant the PND lifting role to Compliance related PND	x			
4.	Application should deny other staff from lifting Compliance related PND.	x			
5	Usability should be with ease.	x			

M = Mandatory; D = Desired; O = optional

Document Approval:

S/NO	NAME	ROLE	DEPARTMENT	SIGNATURE	DATE
1.	Akintumiri Oluwasina	Requester	Compliance Group		03-03-2023

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2.	Cosmas Uwaezuoke	Sponsor	Compliance Group		06/03/2023
3.	Ibukunoluwa Tijani	Project Manager	Project Management Services		06/03/2023
4.	Louis Azegba	Head, Project Management Office	Project Management Services		07/03/2023
5.	Idayat Oshodi	Core Banking	Information Technology		14/03/2023
6.	Tolulope Ogundipe	Group Head Banking Services	Banking Services		16/03/2023
7	Myke Koledoye	Chief Information Officer	Information Technology		

APPROVAL BY THE COO:

APPROVED



DECLINED

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Comments

Please note that even at Compliance level, the maker-checker rule on PND removal must still apply in line with due diligence enforcement.

COO's Signature:  Date: 17/03/2023