



BUSINESS REQUIREMENTS DOCUMENT

AUTOMATED DEFERRAL PORTAL

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

There is need to create a portal where all deferrals are logged. This is to enable appropriate monitoring. The portal should also be able to apply auto PND to accounts whose deferral have expired. This is to prevent any non-compliance with Customer Due Diligence (CDD) policy of the bank and Regulators. Deferral's PND should only be removable by compliance team or by the System after regularisation.

Business Purpose, Objectives, and Goals

Amongst other things, the objectives of the project include:

1. To ensure that document deferral process in the bank is not abused.
2. Ensure the right Deferral Authority meant for each document is adequately mapped
3. Prevent unauthorised PND removal from account with incomplete documentation.
4. Eliminate paper cost.
5. Allow ease and virtual review and retrieval of deferred documents for relevant stakeholders.
6. For ease of processing deferral without long process currently experienced.

BRD Category

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

- ☒ Business requirements for major 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	Create a deferral portal where all account documentation deferrals are logged for monitoring and for auto placement of PND on accounts with expired deferrals
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AFFECTS	All Compliance Staff, Relationship Officers and Branch Services.
THE IMPACT OF WHICH IS	Eliminate paper/manual deferral and establish auto placement of PND at the expiration of deferral period
A SUCCESSFUL SOLUTION WOULD	Ensure compliance with Regulators and avoid penalties and risk that may crystallise due to deficient data.

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. Relationship Managers can log in their deferral request through the portal.
2. Deferral Authority can view all deferrals request assigned to them.
3. Dashboard reports and monitor branch positions. The GH Banking Services could view and make comments.
4. Auto PND accounts at the expiration of deferral date (no deferral could stay beyond the maximum period of four weeks before PND is replaced)
5. Automate request from the Relationship Managers or BSM to Conduct and Compliance to lift PND on regularised Accounts.
6. Link Deferral Portal to the Shared Folder to enable Conduct and Compliance review Accounts Opening Package (AOP). Where AOP is not on the Shared Folder, No 5 request cannot be made.
7. Dashboard report on Accounts with incomplete documentation but not on PND with their grace period.

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8. Escalate (through mail) an expired deferral to the Relationship Manager, Branch Service Manager, Approving Authority and Compliance where such remains un-regularised after 24 hours.
9. Daily escalation to the Directorate Head where expired documentation remains unregularized after 72 hours of the deferral period.
10. Customize some '**PND Reasons**' to Compliance and once selected while placing the PND, would require appropriate team to lift.

USER GROUPS IMPACTED

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

S/N	USER CLASSES	DESCRIPTION	ROLE/FUNCTION
1.	Inputter	Relationship Managers, Branch Service Managers	General user group
2.	Approval Authorities	Compliance, Regional and Branch Services Group Head	General user group
3.	Reviewers	Compliance, Internal Audit, BSM (BSM cannot approve his/her input)	General user group
4.	View/Report	MIS	Access Creation and Support

USER EXPECTATIONS

S/N	EXPECTATION
1.	A portal to capture all approved deferrals on accounts with incomplete documentation
2.	Deferral approvals effected on the portal – no paper/manual approval
3.	Auto PND of accounts with expired deferrals with an Email to the RM
4.	Lifting of PND should be done only by Compliance team, if the PND was placed by the team.
5.	User access should be authenticated using active directory and token

AS-IS PROCESS FLOW

Detail the current process step-by step below			
PROC STEP	DESCRIPTION	RESPONSIBILITY	PROCESS OUTPUT
(1)			
1.	Relationship officer initiates request for deferral	RM	
2.	Chief Business Officer approves for 2 weeks deferral	CBO	
3.	If additional deferral is required, an Executive Director approves for additional extension (2 weeks)	ED	
4.	Branch Services Manager documents the approved Deferral Forms.		

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 Logs deferral into the portal (relationship officer or business officer)	RM	
2.	Relationship officer inputs customer account no and other details should be auto loaded. Information such as : Customer's Name, Account No, BVN, Branch, Type of Account and Relationship Manager	RM and Portal	
3.	Request is routed for approval by the chief business officer	CBO	
4.	Once deferral dates expire, portal sends request to CBA to auto PND account where documentation is still incomplete	Portal	
5.	The Customer Service and the Branch Manager should be enabled to upload regularised documents on the portal and update relevant data fields.	CSU, BSM	

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6	Where documentation is Complete, Portal should send an update to CBA to lift PND and alerts Compliance Team.		
7.	Relationship Manager request for 2 weeks extension, the portal lift PND once it is approved by the Executive Director - This is allowed once and a maximum of two (2) weeks.	RM, Portal and Flexcube	
8.	Once deferral extension dates expire, portal sends request to CBA to auto PND account if documentation is still incomplete.	Portal	
9.	Compliance conducts Periodic reviews as recommended	Compliance Team	
10.	User access should be authenticated using active directory and token		

FUNCTIONAL REQUIREMENTS


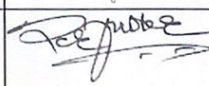
FUNCTIONAL REQUIREMENTS					
S/No	REQUIREMENTS	M	D	O	COMMENTS
1.	User access should be authenticated using active directory and token.	x			
2.	Application must have a workflow approval process	x			
3.	Application must be able to auto place PND on accounts with expired deferrals	x			
4.	Application should have roles and privileges set	x			
5	Usability should be with ease.	x			
6	Application must be linked to the Shared Portal				

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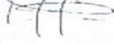
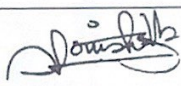
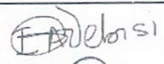
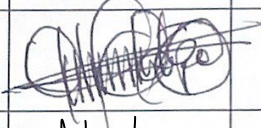

7	<p>Application should list all possible document that could be deferred.</p> <p>Passport Photo Valid ID BVN SCUML Certificate Positive Reference Form Utility Bill Phone No Completed KYC Form Completed CAV Form Credit Check/Returned Cheque History Search Report Board Resolution Letter of Introduction Registration Document- with CAC (Form 001, MEMART) Reg Document from Agency / Ministry Registration Document from Associations Resident Permit. Letter of Introduction Employment Letter Birth Certificate Marriage Certificate Court Affidavit Newspapers Publication for name change. Letter of Admission</p>				
8	There should be Dashboards that summarizes key parameters by inputters and branch.				

M = Mandatory; D = Desired; O = Optional

Document Approval:

S/NO	NAME	ROLE	DEPARTMENT	SIGNATURE	DATE
1.	Akintunmiri Oluwasina	Requester	Compliance Group		07/03/2023
2.	Cosmas Uwaezuoke	Sponsor	Compliance Group		08/03/2023

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3.	Ibukunoluwa Tijani	Project Manager	Project Management Services		13/03/2023
4	Abisola Ogunjulugbe	Business Development Officer	Business Development		21/03/2023
4.	Louis Azegba	Head, Project Management Office	Project Management Services		29/03/2023
5.	Idayat Oshodi	Core Banking	Information Technology		
6.	Tolulope Ogundipe	Group Head Banking Services	Banking Services		
7	Myke Koledoye	Chief Information Officer	Information Technology		11/04/2024

APPROVAL BY THE COO:

APPROVED



DECLINED

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Comments

I approve for speedy execution!

COO's Signature: _____



Date: _____

13/04/23