

Outcome of organisation's own propriety assessment

Both the bank or insurer and DNB assess the propriety of second-tier senior officers. You are responsible for carrying out an assessment on propriety of second-tier senior officers yourself. Please record the outcome on this form and submit it to us.

The form lists various sources of information that can be used to carry out the assessments. You can tick the sources that you consulted. There is also room to write down the outcome of your own investigation.

Sources of information

You may use the following sources of information:

Assessment form

The senior officer to be assessed has completed the Second-tier Management Propriety Assessment Form. The form explains what is relevant to DNB in assessing propriety. Please check whether the senior officer has completed the form fully and correctly. You should check the correctness of the answers with the means available to you. You will not be able to check all answers for correctness, as you are not authorised to request information from certain bodies. However, we have this authority and will make additional inquiries into tax law, supervisory and criminal antecedents.

Your organisation's own systems

Your organisation may have information on the senior officer that could be relevant to the propriety assessment, e.g. an incidents register listing breaches of integrity such as non-compliance with internal compliance regulations.

Data banks and public sources

You can use data banks and public sources to examine matters such as the private and commercial antecedents of the senior officer. For example, the Land Registry will list any property attachments. Other data banks may also reveal indications of financial problems. You can consult liquidation reports and search through court rulings. The trade register of the Chamber of Commerce will show secondary activities of the senior officer which may lead to conflicts of interest with your organisation. Using the senior officer's CV, you can check whether any of the senior officer's previous positions was at organisations that received negative publicity in recent years.

Interview with the senior officer

You can investigate other relevant circumstances in an interview with the senior officer. Holding an interview is not mandatory, but it may shed more light on the results of your investigation. If your assessment gives us reason to do so, we may interview the person to be screened.

Please note that the time we need to perform our assessment also depends on the quality of your own integrity assessment. If we believe your assessment was sufficiently detailed and comprehensive, we will be able to complete our assessment more quickly.

Name of organisation	
Attachment to the Integrity Screening Form 2nd echelon of	
First names of senior officer	
Initials	
Prefixes and surname	
Official position at the organisation	

Which sources did you consult for your organisation's own propriety assessment?

Own systems
 Land registry
 Trade Register of the Chamber of Commerce
 Company Info
 Graydon
 Experian
 Lexis Nexis
 Google
 Other, please specify _____

What were the results of your organisation's own assessment?

No particulars to report
 We found the following particulars _____

Did you take any follow-up action further to these findings?

No
 Yes, interview with the senior officer in question
 Yes, other, please specify _____

Other relevant information _____

Please print this form and have it signed by one (or, if necessary, two) of the institution's authorised signatories.

Name	_____	Name	_____
Position	_____	Position	_____
Date	__ _ _ _ _ _ _ _	Date	__ _ _ _ _ _ _ _
Signature	_____	Signature	_____