

# Practical guidance in respect of reporting under the Common Reporting Standard (CRS)

Version 5.0; release date 19 January 2021

This practical guidance is issued to assist Financial Institutions (FI)'s submitting reports under the Common Reporting Standard (CRS). It replaces all previous practical guidance issued and applies to all CRS reports submitted to Jersey from 18 January 2021 until further notice.

This guidance does not replace the requirement for an FI to comply with the [Taxation \(Implementation\) \(International Tax Compliance\) \(Common Reporting Standard\) \(Jersey\) Regulations 2015](#).

The XML sample texts shown in this guidance are for specific illustrative purposes only and therefore is not an exhaustive list all mandatory elements for a valid CRS file.

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## 1. Submission of CRS reports to Jersey

CRS reports must be submitted using the Jersey AEOI portal. A test portal site is available to validate anonymised reports before validating and submitting completed reports through the live portal. Live client data must not be submitted to the test portal.

[Link to live portal](#)

[Link to test portal](#)

## **2. Registering on the live and test portals - Updated**

If you have not already registered on the live portal, complete the online registration application as soon as possible. If you elect to register on either the live or test portal please allow up to 2 working days for your application to be processed.

The test portal site is available to validate anonymised reports before validating and submitting completed reports through the live portal. Live client data should not be submitted to the test portal.

Please note that the live and test portals are separate systems and users must therefore register separately on each. Registration numbers issued from May 2017 onwards in respect of the test portal will begin with the letter "T" in order to assist users to understand which system they have registered for.

Please ensure all contact details are provided when registering on the Jersey AEOI portal. Note that if using a generic inbox, all members of your team who have access to the inbox will be able to view the information on the portal relating to the registration.

All communications regarding errors, penalties and queries about filing will be sent to the email addresses registered to the users on the AEOI portal. Institutions must therefore ensure these are kept up to date to ensure important communications are received.

It is the administrator's responsibility to ensure the registration details as well as the user details and access levels are up to date. If the administrator associated with the account is to change (e.g. exit the company, move departments or roles, etc.) they must ensure a new administrator is registered before the change occurs. It is good practice to have more than one administrator on the system as a contingency.

Guidance has been introduced to assist you with the transfer of an FI when a new third party takes on the responsibility for CRS reporting.

The International Tax team is unable to amend email addresses or user details except under exceptional circumstances.

## **3. Importance of testing all reports**

Testing your reports is an important part of the submission process. Utilising the test site facility will ensure errors are identified prior to submission of the final report, thereby minimising the errors you may be asked to correct at a later date.

#### 4. How to report – the OECD schema - Updated

Reports must be submitted using the OECD's Common Reporting Standard (CRS) schema. Whilst the CRS schema may appear very similar to the schema used for the purposes of reporting under US FATCA, there are important differences.

This document is not intended as a guide to all of the differences between reporting for FATCA and CRS purposes; institutions must ensure that they fully understand their obligations under the CRS Regulations and how to correctly format their reports.

[Download the CRS schema](#)

[Download the CRS Implementation Handbook](#)

[Download the CRS Status Message XML Schema](#)

A new version of the CRS Schema, version 2, has been introduced for all CRS reports exchanged from 1 February 2021. You need to ensure that any reports submitted to the Jersey AEOI portal from 18 January 2021 onwards are compliant with the new reporting format. The updated schema can be found [here](#).

The following is the new data required in the namespace of your reports

```
<?xml version="1.0" encoding="UTF-8"?>  
<CRS_OECD xmlns="urn:oe.cd:ties:crs:v2"  
xmlns:stf="urn:oe.cd:ties:crsstf:v5"  
xmlns:ftc="urn:oe.cd:ties:fatca:v1"  
xmlns:cfc="urn:oe.cd:ties:commontypesfatcacrs:v2"  
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"  
version="2.0">
```

#### 5. Single or multi-jurisdictional reporting

The Comptroller of Revenue will accept reports submitted under the CRS which include data to be reported to multiple jurisdictions (consolidated reports); however, financial institutions may elect to continue to submit single jurisdiction reports.

Regardless of the format of reporting adopted by each institution, it remains the responsibility of that institution to ensure that the jurisdiction to which their clients' information is to be transmitted is correctly identified on the returns.

#### 6. Empty/Blank Data tag

Any XML file containing an empty/blank data tag will fail validation on the Jersey AEOI portal.

**Figure 1** – example of empty data tags

```
<Individual>  
<ResCountryCode>KR</ResCountryCode>  
<TIN issuedBy="IM">abc987</TIN>  
<Name nameType="OECD202"><PrecedingTitle>String</PrecedingTitle>  
<FirstName ></FirstName>  
<MiddleName ></MiddleName>  
<NamePrefix ></NamePrefix>  
<LastName ></LastName>  
<GenerationIdentifier> </GenerationIdentifier>  
<Suffix></Suffix>  
<GeneralSuffix></GeneralSuffix>  
</Name>
```

If a field is optional according to the OECD schema and you are not populating the data tag with any data, it must be removed from the file. However, if a data tag is required for validation as specified by the CRS schema, this element cannot be omitted and must contain valid data.

## 7. Date of Birth

As the collection of date of birth information is mandatory under the Money Laundering (Jersey) Order 2008, all CRS reports submitted through the Jersey AEOI portal must contain valid date of birth information.

The Jersey AEOI portal will not validate any file where the Date of Birth element is omitted.

Where, in exceptional circumstances, an FI is unable to comply with this requirement, they must contact the Jersey Competent Authority at [AEOI@gov.je](mailto:AEOI@gov.je) providing a full explanation, at which point they will be provided further advice. Failure to collect and report a client's Date of Birth will immediately attract a penalty under Regulation 10 of the [Taxation \(Implementation\) \(International Tax Compliance\) \(Common Reporting Standard\) \(Jersey\) Regulations 2015](#).

## 8. Trustee and third party reporting

Unlike FATCA, it is not permissible to report as a sponsor or intermediary under CRS.

Third parties acting on behalf of multiple Jersey financial institutions may however, elect to report in a consolidated manner (akin to how a sponsor reports for FATCA). Trustees reporting on behalf of multiple trusts may also submit consolidated reports.

Third Parties and trustees wishing to submit consolidated reports are reminded that use of the "Sponsor" section of the schema is prohibited for CRS. Reports can however, contain multiple reporting financial institutions so long as there is only one

'ReportingFI' and 'ReportingGroup' in each 'CrsBody' element of the report, as illustrated below:

**Figure 2** – example of multiple CrsBodies in the same report

```
<CrsBody>  
<ReportingFI>  
<Name>TRUST A</Name>  
</ReportingFI>  
<ReportingGroup>  
<AccountReport>  
<AccountHolder>  
<Individual>  
</AccountHolder>  
</AccountReport>  
</ReportingGroup>  
</CrsBody>  
<CrsBody>  
<ReportingFI>  
<Name>TRUST B</Name>  
</ReportingFI>  
<ReportingGroup>  
<AccountReport>  
<AccountHolder>  
<Individual>  
</AccountHolder>  
</AccountReport>  
</ReportingGroup>  
</CrsBody>
```

A reporting FI or a Trustee Documented Trust (TDT) has not discharged its reporting obligations if its name is not shown in the ReportingFI element of the report.

## 9. Nil returns - Updated

The Taxation (Implementation) (International Tax Compliance) (Common Reporting Standard) (Jersey) Regulations 2015 will be amended to include mandatory Nil returns in 2022 in respect of 2021 accounts. It is therefore best practice but not mandatory to report any Nil returns in 2021 in respect of 2020 accounts.

Entities which are registered on Jersey's AEOI portal, have not submitted reports, nor had one submitted on their behalf, will be contacted and queried in relation to non-reporting by the submission deadline.

In order to assist FIs with CRS compliance, they may choose to notify Revenue Jersey via the AEOI portal in one of two ways:

*Option 1: Using the nil return tick box on the upload page of the AEOI portal*

There is an option to tick this box when the registered FI has no reportable accounts.

*Option 2: Completing a nil return using the CRS schema*

Nil returns can also be prepared using the value CRS703 in the MessageTypeId element of a CRS report.

**Figure 3** – example of nil return within the report

```
<MessageSpec>
<SendingCompanyIN> XXXXXX.00000.XX.832</SendingCompanyIN>
<TransmittingCountry>JE</TransmittingCountry>
<ReceivingCountry>JE</ReceivingCountry>
<MessageType>CRS</MessageType>
<Warning>String</Warning>
<Contact>String</Contact>
<MessageRefId>JE2019JEStrng3651VCRS7_33V2</MessageRefId>
<MessageTypeId>CRS703</MessageTypeId>
<ReportingPeriod>2019-08-13</ReportingPeriod>
<Timestamp>2001-12-17T09:30:47Z</Timestamp>
</MessageSpec>
<CrsBody>
<ReportingFI>
<ResCountryCode>JE</ResCountryCode>
<IN INType="String" issuedBy="CM">AD76209</IN>
<Name nameType="OECD201">String</Name>
<Address legalAddressType="OECD301">
<cfc:CountryCode>BQ</cfc:CountryCode>
<cfc:AddressFix><cfc:City>St Helier</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>String</cfc:AddressFree>
</Address>
<DocSpec>
<stf:DocTypeId>OECD1</stf:DocTypeId>
<stf:DocRefId>JE2019JEStrng1234VCRS7_33V2</stf:DocRefId>
</DocSpec>
</ReportingFI>
</ReportingGroup>
</CrsBody>
```

## 10. Data Protection

Data submitted in CRS reports will be extracted by Revenue Jersey and exchanged with the jurisdiction of residence of the individuals and entities, as identified in each report. FIs, and those reporting, must ensure that an appropriate level of due diligence is taken when submitting files to the Jersey AEOI portal, as a failure to correctly identify the jurisdiction of residence of the individuals and entities involved will lead to information being reported to an incorrect jurisdiction. It is therefore the responsibility of the reporting FI to ensure the accuracy of the data submitted.

## 11. Specific aspects of CRS reporting - Updated

### 11.1 Namespace

All reports must use the following namespace in order to be accepted by the Jersey AEOI portal. This has been updated with the implementation of CRS v2 Schema.

**Figure 4** – mandatory namespace for use for Jersey CRS reporting

```
<?xml version="1.0" encoding="UTF-8"?>
<CRS_OECD xmlns="urn:oe.cd:ties:crs:v2"
xmlns:stf="urn:oe.cd:ties:crsstf:v5"
xmlns:ftc="urn:oe.cd:ties:fatca:v1"
xmlns:cfc="urn:oe.cd:ties:commontypesfatcacrs:v2"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
version="2.0">
```

### 11.2 MessageSpec

Information in this section of the report identifies the sender and recipient of the data.

When submitting the data to the Assessor, Jersey FIs must ensure that the 'TransmittingCountry' and 'ReceivingCountry' elements are both set to 'JE' as illustrated below.

**Figure 5** - example of TransmittingCountry and ReceivingCountry

```
<MessageSpec>
<SendingCompanyIN> XXXXXX.00000.XX.832</SendingCompanyIN>
<TransmittingCountry>JE</TransmittingCountry>
<ReceivingCountry>JE</ReceivingCountry>
<MessageType>CRS</MessageType>
```

### 11.3 MessageRefId and DocRefId

Each 'MessageRefId' and 'DocRefId' used must be unique in space and time therefore, to ensure that this is the case, Jersey FIs must follow one of the two

prescribed formats detailed below. Regardless of the option chosen, the 'MessageRefId' and 'DocRefId' must begin with JE20XXJE, i.e. for reporting in 2018 in respect of 2017 accounts use JE2017JE, for reporting in 2019 in respect of 2018 accounts use JE2018JE, etc.

*Option 1:* The format currently used for US FATCA with GIIN

Jersey FIs can elect to use a similar format to that prescribed by the US for FATCA filing. This requires the FI to use its US issued GIIN (Global Intermediary Identification Number) followed by a full stop and a unique number/character combination). For CRS purposes, this must also start with "JE20XXJE", where XX is the last two digits of the year to which the data relates.

Example using a US GIIN format:

**JE20XXJE000000.00000.XX.832.123abc**

*Option 2:* Format with no GIIN

Alternatively you may create your own number/letter format, provided it begins with "JE20XXJE", where the last two digits of the year to which the data relates.

Example:

**JE20XXJE.123abc456def789**

## 11.4 Reporting FI

Information in this section of the report identifies the reporting FI. The 'ResCountryCode' element for Jersey FIs must be JE. If, after attempting to validate a report, you receive the error message "ReportingFI ResCountryCode must match SendingCompanyIN", this indicates that the Residential Country code of the Reporting FI does not match the Transmitting Country code, which in both cases should be JE.

The following elements within Reporting FI must not be left blank:

- Name
- ReportingFI.IN
- Address - Addresses can be provided in a structured format using either "AddressFix" or "AddressFree". If using AddressFree, the 'City' element of AddressFix must be populated and cannot be blank as this is required for schema validation.

**Figure 6** – example of how the address should be structured using AddressFree

```
<Address legalAddressType="OECD301">  
<cfc:CountryCode>JE</cfc:CountryCode>  
<cfc:AddressFix>
```



```
<cfc:City>St Helier</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>FULL ADDRESS</cfc:AddressFree>
</Address>
```

**Figure 7** – example of how the address should be structured using AddressFix. Please note defaults in the City element will no longer be accepted. A city name is mandatory.

```
<Address legalAddressType="OECD301">
<cfc:CountryCode>JE</cfc:CountryCode>
<cfc:AddressFix>
<cfc:City>St Helier</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>String</cfc:AddressFree>
</Address>
```

## 11.5 Taxpayer Identification Numbers (TINs)

**Entities** – It is recommended that where a GIIN has been issued, it is used. Alternatively, use of a TIN a company registration number, an EIN (Global Entity Identification Number) or any other identifying number specified by the tax administration of the jurisdiction receiving the information may be used.

**Individuals** – Each jurisdiction has published details of the TIN format, which is maintained by the OECD. ([View details of TIN formats](#)).

If the TIN is unknown, the Jersey portal will now only allow the default 'NOTIN' to be included in the TIN element for CRS purposes. Reports will also be rejected if the TIN element is omitted.

## 11.6 Date of Birth

The data format for Date of Birth is YYYY-MM-DD. Validation will fail on the Jersey portal if dates of birth are outside the valid range i.e. they may not be before 1900 or after the current year. If the element is omitted completely, validation will also fail.

## 11.7 AccountNumberType

This allows an FI to identify the type of account being reported.

Where an IBAN or ISIN is available, it should be provided and the appropriate information concerning the account number type supplied. The acceptable options are:

|                |   |             |
|----------------|---|-------------|
| OECD601 – IBAN | – | (Fig.8 (a)) |
| OECD602 – OBAN | – | (Fig.8 (b)) |
| OECD603 – ISIN | – | (Fig.8 (c)) |

OECD604 – OSIN – (Fig.8 (b))  
OECD605 – Other – (Fig.8 (b))

**Figure 8 (a)** – example of IBAN - OECD601 – must be between 15 and 31 digits starting with country code

```
<cf:AccountNumberAcctNumberType="OECD601">CCXXXXXXXXXXXXXXXXXXXX</cf:AccountNumber>
```

**Figure 8 (b)** – example using codes OECD602, OECD604 and OECD605 – no specific length or format for the account number

```
<cf:AccountNumber AcctNumberType="OECD605">5678</cf:AccountNumber>
```

**Figure 8 (c)** – example of ISIN - OECD603 – must be 12 digits starting with country code

```
<cf:AccountNumberAcctNumberType="OECD603">CCXXXXXXXXXX</cf:AccountNumber>
```

## 11.8 Prohibited fields

Jersey FIs should note that the ‘Sponsor’, ‘Intermediary’ and ‘Pool Report’ elements of the schema **are not allowable** for CRS.

## 11.9 Undocumented accounts – to be used when residence cannot be established.

Undocumented accounts must be reported.

Where there is more than one party to an account and some are documented and others are not, then separate AccountReport elements should be completed in respect of each group.

Where a party to an account is undocumented, this must be stated in the AccountNumber element and the ResCountryCode must be shown as JE. You must also populate the address as “undocumented”.

**Figure 9** - example of an undocumented account

```
<AccountReport>  
<DocSpec>  
<stf:DocTypeIndic>OECD1</stf:DocTypeIndic>  
<stf:DocRefId>JE2019JESstring1237VCRS7_285V2</stf:DocRefId>  
</DocSpec><AccountNumber UndocumentedAccount="true"  
AcctNumberType="OECD605">123456789</AccountNumber>  
<AccountHolder>
```

```

<Organisation>
<ResCountryCode>FR</ResCountryCode>
<IN issuedBy="FR">NOTIN</IN>
<Name nameType="OECD207">ABC Company</Name>
<Address legalAddressType="OECD304">
<cfc:CountryCode>GY</cfc:CountryCode>
<cfc:AddressFix><cfc:City>St Helier</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>String</cfc:AddressFree>
</Address>
</Organisation>
<AcctHolderType>CRS101</AcctHolderType>
</AccountHolder>
<ControllingPerson>
<Individual>
<ResCountryCode>JE</ResCountryCode>
<TIN issuedBy="JE">NOTIN</TIN>
<Name nameType="OECD202"><PrecedingTitle>String</PrecedingTitle>
<FirstName xnlNameType="text">String</FirstName>
<MiddleName xnlNameType="text">String</MiddleName>
<NamePrefix xnlNameType="text">String</NamePrefix>
<LastName xnlNameType="text">String</LastName>
<GenerationIdentifier>String</GenerationIdentifier>
<Suffix>String</Suffix>
<GeneralSuffix>String</GeneralSuffix>
</Name>
<Address legalAddressType="OECD301">
<cfc:CountryCode>JE</cfc:CountryCode>
<cfc:AddressFix><cfc:City>Undocumented</cfc:City>
</cfc:AddressFix><cfc:AddressFree>Undocumented</cfc:AddressFree>
</Address>
<Nationality>JE</Nationality>
</Individual>
<CtrlgPersonType>CRS807</CtrlgPersonType>
</ControllingPerson>

```

## 11.10 Reporting Group

There can only be one ReportingGroup for each CrsBody in any one CRS report, however a single report may contain multiple CrsBodies in the same report.

## 11.11 Controlling Persons

Where an Account Holder is identified as an Individual, Controlling Persons cannot be added to the Account Report. This option is only available when the Account Holder is an Organisation.

## 11.12 Correction (OECD2) and VOID (OECD3) (Updated)

Within the MessageSpec of the report, a CorrMessageRefId must be populated with the MessageRefId of the original file containing the Account Holder information. This element cannot be removed or left blank.

New guidance on the correction and voiding of CRS report can be located on the [gov.je website](http://gov.je).

### a) Message Type Indicator

This element will be mandatory in all new, correction and void and Nil reports.

CRS701 – The message contains new information (OECD1 report)

CRS702 – The message contains corrections or deletions for previously sent information.(OECD2 or OECD3 report)

CRS703 – The message advises there is no data to report (Nil report).

#### <MessageSpec>

```
<SendingCompanyIN>String</SendingCompanyIN>  
<TransmittingCountry>JE</TransmittingCountry>  
<ReceivingCountry>JE</ReceivingCountry>  
<MessageType>CRS</MessageType>  
<Warning>String</Warning>  
<Contact>String</Contact>  
<MessageRefId>JE2020JE1234V.JEVCRS7_288V2</MessageRefId>  
<MessageTypeIndic>CRS701</MessageTypeIndic>  
<ReportingPeriod>2020-12-31</ReportingPeriod>  
<Timestamp>2020-12-17T09:30:47Z</Timestamp>  
</MessageSpec>
```

### b) CorrMessageRefId

When completing a correction or void report, it will necessary to include a CorrMessageRefId in the Message Spec. The CorrMessageRefId is the Message RefId from the file where the original data was reported.

#### <MessageSpec>

```
<SendingCompanyIN>String</SendingCompanyIN>  
<TransmittingCountry>JE</TransmittingCountry>  
<ReceivingCountry>JE</ReceivingCountry>  
<MessageType>CRS</MessageType>  
<Warning>String</Warning>  
<Contact>String</Contact>  
<MessageRefId>JE2020JE1234V.JEVCRS7_CORR</MessageRefId>  
<MessageTypeIndic>CRS702</MessageTypeIndic>  
<CorrMessageRefId>JE2020JE1234V.JEVCRS7_288V2</CorrMessageRefId>  
<ReportingPeriod>2020-12-31</ReportingPeriod>  
<Timestamp>2020-12-17T09:30:47Z</Timestamp>  
</MessageSpec>
```

## 12. Validation and Submission of files – Warning Notice

A common indicator that data has been incorrectly input into a CRS report is where there is a mismatch between the address and the jurisdiction(s) of tax residence reported. As a result, an additional check has been added to files, both at the validation and submission stage on the AEOI Portal. The system will now check your file to identify if any Account Holder's AddressCountryCode element fails to match at least one of the Residential Country Codes (ResCountryCode) reported.

Revenue Jersey appreciates that there may be genuine reasons why an account holder's address may not be in the jurisdiction(s) of tax residence. As such, where mismatches are identified, the file will not be rejected and you will see the following warning:

*"[XXX number] of Account Holders within the file do not have an Address Country Code that matches at least one of their Residential Country Codes.*

*Before proceeding please confirm that you are satisfied that the reporting within your file is correct."*

The DocRefId's of the first 100 Account Holders affected will then be listed and you will be given the option to select "Yes" or "No".

Selecting "No" will give you the chance to review your file and make further checks on the quality of the data reported, as necessary.

Selecting "Yes" indicates that you are satisfied that the reporting is correct and will proceed.

As some FIs choose to submit their reports before validation, this check will be performed at both the validation and submission stage. If you are answering the question at the validation stage, please note that the file still is required to be submitted, at which point you will be asked the question again.

If the person validating the files is not the person who ultimately submits them, it is recommended to advise all relevant parties of these instances prior to the submission of your files. This will ensure enable confirmation that these account holders have been reported correctly.

Deputy Director – International Tax  
19 January 2021