

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

Version 3.0; release date 5 April 2019

These guidance notes have been issued to assist entities to prepare reports under the Common Reporting Standard (CRS). They replace all previous practical guidance notes issued and apply to all CRS reports submitted to Jersey from 5 April 2019 until further notice.

These notes are intended to provide practical guidance and do not replace the requirement for a reporting Financial Institution (“FI”) to ensure it complies with all of the relevant provisions of the [Taxation \(Implementation\) \(International Tax Compliance\) \(Common Reporting Standard\) \(Jersey\) Regulations 2015](#).

The XML sample texts shown in this guidance are for illustrative purposes only, and therefore do not contain 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 trying to validate and submit completed reports through the live portal. Live client data should 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, please complete the online registration application as soon as possible. If you wish to register on either the live or test portal please allow time for your application to be processed.

The test portal site is available to validate anonymised reports before trying to validate and submit 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 completely separate systems, and users must 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 what system they have registered for.

Updated

When registering on the Jersey AEOI portal please ensure all contact details are provided. Please note 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 are sent to the email addresses registered to the users on the AEOI portal. Institutions must therefore ensure these are kept up to date otherwise they risk missing important communications.

It is the administrator's responsibility to keep the registration details as well as the user details and access levels up to date. If the administrator associated with the account is to change (eg if they leave the company, change departments etc) then they must ensure they register a new administrator before leaving. It is good practice to have more than one administrator on the system to avoid any issues.

The International Tax team will not be able 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 help ensure that errors are picked up prior to the submission of the final report. This should minimise the amount of errors that you may be asked to correct at a later date.

4. How to report – the OECD schema

Reports must be submitted using the OECD’s Common Reporting Standard schema. Where at a glance it looks very similar to the schema used for the purposes of reporting under US FATCA, there are some 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](#)

5. Single or multi-jurisdictional reporting

The Comptroller of Taxes will accept reports submitted under the CRS which include data to be reported to multiple jurisdictions (consolidated reports).

Financial institutions which wish to do so may continue to submit single jurisdiction reports.

In order to facilitate consolidated reporting, the “namespace” element of all reports must use a specific “namespace” element, which is set out in Section 12.1 below.

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 their return.

6. Empty/Blank Data tag

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

Fig.1 – example of empty data tags

```
<Individual>
<ResCountryCode>JE</ResCountryCode>
<TIN issuedBy="JE">NOTIN</TIN>
<Name nameType="OECD202">
<PrecedingTitle></PrecedingTitle>
<FirstName xnlNameType>Jane</FirstName>
<MiddleName xnlNameType></MiddleName>
<NamePrefix xnlNameType></NamePrefix>
```

```
<LastName xnlNameType>Doe</LastName>
<GenerationIdentifier></GenerationIdentifier>
<Suffix></Suffix>
<GeneralSuffix></GeneralSuffix>
</Name>
```

If a field is optional as per 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, then this element cannot be omitted and must contain valid data.

7. Date of Birth (Updated)

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

Updated

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

Where, in exceptional circumstances, a financial institution is unable to comply with this requirement, they must contact the Jersey Competent Authority providing a full explanation, at which point they will be given further instructions. 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 (Updated)

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 report in a consolidated manner (akin to how a sponsor reports for FATCA) if they wish. 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:

Fig.2 – example of multiple CrsBodies in the same report

```
<CRS_OECD>
<MessageSpec>
```

```

<TransmittingCountry>JE</TransmittingCountry>
<Contact>Name and Number</Contact>
</MessageSpec>
<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>
</CRS_OECD>

```

Updated

A reporting FI or a 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 Jersey CRS Regulations are to be amended shortly to call for mandatory Nil returns in 2020 in respect of 2019 accounts. It is therefore best practice to report any Nil returns in 2019 in respect of 2018 accounts.

Entities which are registered on Jersey's AEOI portal and which have not submitted reports, or have not had one submitted on their behalf, will be contacted and asked to explain why they have not reported by the submission deadline.

In order to make it easier for institutions to demonstrate their compliance with the CRS, 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 financial institution 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.

Fig.3 – example of nil return within the report

```
<MessageSpec>
<SendingCompanyIN>XXXXXX.00000.SL.832</SendingCompanyIN>
<TransmittingCountry>JE</TransmittingCountry>
<ReceivingCountry>JE</ReceivingCountry>
<MessageType>CRS</MessageType>
<Warning>String</Warning>
<Contact>String</Contact>
<MessageRefId>JE2017JEString</MessageRefId>
<MessageTypeId>CRS703</MessageTypeId>
<ReportingPeriod>2016-08-13</ReportingPeriod>
<Timestamp>2001-12-17T09:30:47Z</Timestamp>
</MessageSpec><CrsBody>
<ReportingFI>
<ResCountryCode>JE</ResCountryCode>
<IN issuedBy="CM" INType="String">xxxxxx.00000.SL.832</IN>
<Name nameType="OECD201">String</Name>
<Address legalAddressType="OECD301">
<cfc:CountryCode>JE</cfc:CountryCode>
<cfc:AddressFix>
<cfc:City>City</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>String</cfc:AddressFree>
</Address>
<DocSpec>
<stf:DocTypeId>OECD1</stf:DocTypeId>
<stf:DocRefId>JE2017JEString1234</stf:DocRefId>
</DocSpec>
</ReportingFI>
<ReportingGroup>
</ReportingGroup>
</CrsBody>
```

10. Data Protection

Data submitted in Common Reporting Standard reports will be extracted by Revenue Jersey and sent to the jurisdiction of residence of the individuals and entities identified in each report. Financial institutions and those reporting must ensure that due care and attention 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 their information being reported to the wrong jurisdiction. The Jersey Taxes Office takes no responsibility for reviewing the correctness of the data submitted to it.

11. Specific aspects of CRS reporting

11.1 Namespace

All reports must use the following namespace in order to be accepted by the Jersey AEOI portal.

Fig.4 – mandatory namespace for use for Jersey CRS reporting

```
<CRS_OECD xmlns="urn:oe.cd:ties:crs:v1" xmlns:stf="urn:oe.cd:ties:stf:v4"
xmlns:ftc="urn:oe.cd:ties:fatca:v1"
xmlns:cfc="urn:oe.cd:ties:commontypesfatcacrs:v1"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" version="1.0">
...
</CRS_OECD>
```

11.2 MessageSpec

Information in this section of the report identifies who is sending the data and to whom.

When submitting the data to the Assessor, Jersey Financial Institutions should ensure that the 'TransmittingCountry' and 'ReceivingCountry' elements are **both** set to 'JE' as illustrated.

Fig.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 completely unique in space and time so, to ensure that this is the case, Jersey financial institutions **must** follow one of the two prescribed formats detailed below. Regardless of the option you choose 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 and so on.

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

Jersey financial institutions can 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 ReportingFI

Information in this section of the report identifies the reporting financial institution. The ‘ResCountryCode’ element for Jersey financial institutions 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
- 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.

Fig.6 – example of how the address should be structured using AddressFree

```
<Address legalAddressType="OECD301">  
<cfc:CountryCode>JE</cfc:CountryCode>  
<cfc:AddressFix>  
<cfc:City>City</cfc:City>  
</cfc:AddressFix>  
<cfc:AddressFree>The Full Address</cfc:AddressFree>  
</Address>
```


Fig.7 – example of how the address should be structured using AddressFix

```
<Address legalAddressType="OECD301">
  <cfc:CountryCode>BQ</cfc:CountryCode>
  <cfc:AddressFix>
    <cfc:Street>String</cfc:Street>
    <cfc:BuildingIdentifier>String</cfc:BuildingIdentifier>
    <cfc:SuiteIdentifier>String</cfc:SuiteIdentifier>
    <cfc:FloorIdentifier>String</cfc:FloorIdentifier>
    <cfc:DistrictName>String</cfc:DistrictName>
    <cfc:PostCode>String</cfc:PostCode>
    <cfc:City>City</cfc:City>
    <cfc:CountrySubentity>String</cfc:CountrySubentity>
  </cfc:AddressFix>
</Address>
```

11.5 Taxpayer Identification Numbers (TINs) (Updated)

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

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

Updated

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 completely.

11.6 Date of Birth (Updated)

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.

Updated

If the element is omitted completely, validation will also fail.

11.7 AccountNumberType

This allows a financial institution to identify the type of account being reported.

Where an IBAN or ISIN is available, it should be provided and the appropriate information about 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))

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

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

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

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

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

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

11.8 Prohibited fields

Jersey Financial Institutions 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”.

Fig.9 - example of undocumented account

```
<AccountReport>
<DocSpec>
<stf:DocTypeIndic>OECD11</stf:DocTypeIndic>
<stf:DocRefId>JE2017JEStrng123736</stf:DocRefId>
</DocSpec>
<AccountNumber AcctNumberType="OECD605" UndocumentedAccount="true"
>123456789</AccountNumber>
<AccountHolder>
<Organisation>
<ResCountryCode>JE</ResCountryCode>
<IN issuedBy="FR">a</IN>
<Name nameType="OECD207">ABC Company</Name>
<Address legalAddressType="OECD304">
<cfc:CountryCode>FR</cfc:CountryCode>
<cfc:AddressFix>
<cfc:City>City</cfc:City>
</cfc:AddressFix>
<cfc:AddressFree>String</cfc:AddressFree>
</Address>
</Organisation>
<AcctHolderType>CRS101</AcctHolderType>
</AccountHolder>
<ControllingPerson>
<Individual>
<ResCountryCode>JE</ResCountryCode>
<TIN issuedBy="JE">a</TIN>
<Name nameType="OECD202">
<PrecedingTitle>String</PrecedingTitle>
<Title>String</Title>
<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>CG</Nationality>
<BirthInfo>
<BirthDate>1957-08-13</BirthDate>
<CitySubentity>String</CitySubentity>
```

```
<CountryInfo>  
<CountryCode>JE</CountryCode>  
</CountryInfo>  
</BirthInfo>  
</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.

Director – International Tax
5 April 2019