

## MEMORANDUM

**From:** Clare Guile, Head of CARA

**Date:** 2 February 2023

**To:** Tiffany Ebanks, Chief Financial Officer

**Cc'd:** J. Lemuel Hurlston, Chair of CARA Board

**RE:** Purchase Agreement between CIG and CILPA dated 31 December 2021

1. Under the terms of the Purchase Agreement, the outputs purchased by Cabinet and to be delivered by CILPA (delegated to its sub-committee, CARA) during the fiscal year 2022 are as follows –

<b>MEASURES</b>	<b>2022 1 Jan to 31 Dec 2022</b>
<b>QUANTITY</b>	
<ul style="list-style-type: none"> <li>• Number of applications for registration and cancellations of registration processed</li> <li>• Number of ML/TF/PF/TFS risk assessments conducted</li> <li>• Number of supervisory activities and or enforcement actions applied to supervised firms</li> <li>• Number of outreach events and activities delivered to supervised firms</li> <li>• Number of meetings held, and presentations made to other supervisory authorities, LEAs, and relevant stakeholders</li> <li>• Number of public notices, publications, advisories, press releases and responses to industry queries in which CARA provided technical advice, guidance, information, and support to the legal sector</li> </ul>	<p>2-8</p> <p>50-65</p> <p>30-60</p> <p>2-4</p> <p>12-15</p> <p>5-10</p>
<b>QUALITY</b>	
<ul style="list-style-type: none"> <li>• Regulatory and supervisory functions carried out in accordance with applicable legislation, CARA Guidance, policies and procedures and Board directives</li> </ul>	95-100%
<b>TIMELINESS</b>	
<ul style="list-style-type: none"> <li>• Conduct supervisory and enforcement activity according to established timelines</li> </ul>	85-100%

2. The following table shows outputs/ deliverables budgeted per the Purchase Agreement compared to actual deliverables.

Purchase Agreement 2022-2025		2022						YR END TOTAL	
Measurables	QTY	ACTUAL	ACTUAL	ACTUAL	ACTUAL				
		Q1	Q2	Q3	Q4				
		(JAN - MAR)	(APR - JUN)	(JUL - SEPT)	OCT	NOV	DEC		
1	No. of applications for registration and cancellation of registration processed.	2-8	2	6	3	2	0	1	14
2	No. of ML/TF/PF/TFS risk assessments conducted.	50-65	0	53	0	0	0	0	53
3	No. of supervisory activities and or enforcement actions applied to supervised firms.	30-60	1	22	48	1	0	0	72
4	No. of outreach events and activities delivered to supervised firms.	2-4	1	0	0	1	0	0	2
5	No. of meetings held, presentations made to other supervisory authorities, LEAs, and relevant stakeholders.	12-15	9	6	4	2	2	2	25
6	No. of public notices, publications, advisories, press releases, and responses to industry enquiries, in which CARA provided technical advice, guidance, information, and support to the legal sector.	5-10	6	7	17	3	2	1	36

### 3. Measurable #1

3.1. Actual outputs achieved in Q4 totaled three.

3.2. During this period one new firm was onboarded and registered, and two firms were de-registered as no longer providing 'relevant financial business' ("RFB").

3.3. The required budgeted output is 2-8 for 2022. Total outputs achieved at year end totaled 14. The measurable has therefore been exceeded.

### 4. Measurable #2

4.1. This measurable relates to CARA's annual AML Return exercise in which all firms conducting RFB are required to complete and submit a detailed questionnaire on their ML/TF/PF risks and compliance with the Anti-Money Laundering Regulations ("AMLRs"). This data is used by CARA to risk profile each firm which in turn drives CARA's risk-based approach to supervision.

4.2. The required budgeted output is 50-65 for 2022. Actual outputs totaled 53. This measurable has therefore been met.

4.3. There are no figures reported for Q3 and Q4 as the AML Return exercise was completed in Q2.

**5. Measurable #3**

5.1. Actual outputs achieved in Q4 totaled one.

5.2. The required budgeted output is 30-60 for 2022. At the end of 2022, actual outputs achieved totaled 72. This measurable has therefore been exceeded.

**6. Measurable #4**

6.1. Actual outputs achieved in Q4 totaled one.

6.2. The required budgeted output is 2-4 for 2022. At the end of 2022, actual outputs totaled two. This measurable has therefore been met.

**7. Measurable #5**

7.1. Actual outputs achieved in Q4 totaled six.

7.2. The required budgeted output is 12-15 for 2022. At the end of 2022, actual outputs achieved totaled 25. This measurable has therefore been exceeded.

**8. Measurable #6**

8.1. Actual outputs achieved in Q4 totaled six.

8.2. The required budgeted output is 5-10 for 2022. At the end of 2022, actual outputs achieved totaled 36. This measurable has therefore been exceeded.

ENDS.