# Change Request for the update of an External Code Set

Note: this document is to be completed by parties that request to either add new codes or clarify the definition of existing codes or replace existing codes by new one(s) or expire existing codes in one of the [*External Code Sets*](http://www.iso20022.org/external_code_list.page) used in ISO 20022 messages. All change requests conforming to this template that are received prior to the end of a quarter (31 March, 30 June, 30 September, 31 December) will be evaluated by the SEG and, if approved, incorporated in the following quarterly publication cycle of the External Code Sets (respectively, by end of May, August, November and February), unless otherwise specified by the SEG.

# Origin of the request:

## A.1 Submitter:

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| Name of the company, organization, group, initiative or community that submits the change request. | The Mojaloop Foundation |

## A.2 Contact person:

Person that can be contacted for additional information on the request

|  |  |
| --- | --- |
| A.2.1. First name, Last name | Michael Richards |
| A.2.2. Email address | [MRichards@Mojaloop.io](mailto:MRichards@Mojaloop.io) |
| A.2.3. Telephone | +44 7785 360009 |

## A.3 Sponsors:

If the submitter acts on behalf of or has gained support from other organisations, groups, initiatives or communities, these should be listed as sponsors.

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| 1) Africanenda  2) Comesa Business Council  Contact: Dr. Jonathan Pinifolo, [jpinifolo@comesabusinesscouncil.org](mailto:jpinifolo@comesabusinesscouncil.org) |

# Description of the change request:

Specify the request type: creation of new code set, update of existing code set, deletion of existing code set.

For the creation of a new code set or for updating an existing code set, also complete the table in section H below. For the addition of new codes, all the details must be specified, including a proposed code, a proposed code name, a clear definition, and any other indications, such as an example or format to be published with the code set.

|  |  |
| --- | --- |
| Request type: creation, update, deletion | Update |

# Related External Code Set:

For updating or deleting an existing code set, indicate the exact name of the code set as indicated in the [*External Code Sets*](http://www.iso20022.org/external_code_list.page)documents on iso20022.org. For creating a new code set, indicate a proposed name for the new code set.

A specific change request form must be completed for each code set to be updated.

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| ExternalOrganisationIdentification1Code |

# Purpose of the change:

Background, business context, community of users interested by the change and expected benefits/savings.

This section must explain why the existing code set needs to be changed. The reason for the update may be a business reason (e.g., evolution of market practice, or creation of new financial instruments), a technical reason (e.g., automation of the business process, or switch from a batch to a real time process), a regulatory reason (introduction, generally mandatory, of new rule/law) or the extension of the user community (newly identified business requirements).

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| In domestic payment schemes, there is little requirement for participants to establish that the parties to a payment are bona fide customers and not criminals or terrorists. In the case of international payments, however, this is an important consideration. The key resource in this area is the set of [recommendations](https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html) published by the Financial Action Task Force (FATF).  The FATF recommendations provide alternative methods which participants can use to identify their customers to other parties who have a legitimate interest in identifying those customers. In most cases, these methods involve including information about the customer (for instance, their address and their date of birth in the case of natural entities) in the relevant payment message.  The inclusion of information (Personal Identifying Information, or PII) which can be used to identify natural entities (or people, as we call them) is, however, frequently governed by strict rules about privacy, and sometimes also by additional rules prohibiting the export of such information across national boundaries. IIPS schemes may need to apply for special exemptions to these rules in order to include in their messages the information which may be required by FATF.  This is particularly problematic for IIPS schemes, part of whose mission is to encourage the participation of smaller and more informal account-holding institutions. These institutions may find it more onerous than more traditional FIs to meet the security requirements surrounding PII, and their customers may not be required by their regulators to provide, and may not even possess, some of the information that may be required by FATF Recommendation 16.  One of the alternate ways of providing information about a party to a payment provided by FATF is a "customer identification number" (p.81). This is defined as "*a number which uniquely identifies the originator to the originating financial institution and is a different number from the unique transaction reference number referred to in paragraph 7. The customer identification number must refer to a record held by the originating financial institution which contains at least one of the following: the customer address, a national identity number, or a date and place of birth.*" The important point here is that the identification number is meaningful to the issuing FI, and does not need either to be independently significant to other FIs who may be parties to the payment, or contain information which could be used by a third party to identify the FI’s customer. Identifying a party by using a customer identification number would allow an IIPS to meet the stated requirements of FATF without requiring PII to be passed round the system and retained by participants as part of the content of messages.  We propose to extend the list of possible entity identifier types to allow FIs to identify their customers by customer identification number, as defined by FATF. This change will apply to both legal and natural entities. As a general proposition, it seems sensible for the ISO 20022 external code sets to be aligned with FATF recommendations, whether those particular recommendations are followed in particular cases or not. |

# Urgency of the request:

By default, valid change requests, subsequently approved by the SEG will be included in the following quarterly publication of External Code Sets, unless decided otherwise by the SEG.

If there is a need to have the new version of the related code set published earlier, the reason for the urgency and the expected consequences of a delay should be described here. Acceptance of such an unscheduled publication is subject to approval by the SEG.

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| Next quarterly publication |

# Business examples:

Provide examples illustrating usage of the code set and indicate messages where the code set may be used.

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| camt.024, pacs.008, pacs.009 |

# SEG recommendation:

This section will be completed by the SEG in charge of the related External Code Set.

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| --- | --- | --- | --- |
| Accept | |  | Timing |
|  | | Next possible quarterly release | |  |
|  | | Urgent request | |  |

Comments:

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| --- | --- |
| Reject |  |

Reason for rejection: WITHDRAWN – CR1460 has been withdrawn by the submitter. After SEG discussion, they have decided to use the CUST code as it identifies both FI and non-FIs. Submitter confirms he is ok using the CUST code.

# DESCRIPTION OF THE CHANGE REQUEST

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Type | Code Value | Code Name | Code Definition | Replaced By | Additional Information |
| Addition Update Deletion | 4 char |  | Clear and concise definition. Repetition of the code name is not allowed. | Code value (if applicable) | Usage, use case(s) or any additional information useful for the usage of the code. |
| Addition | CUIN | Customer Unique Identification Number | A number used by an FI uniquely to identify one of its customers. |  | This is the customer identification number defined on p.81 of the relevant release of the November 2023 revision of the [FATF recommendations](https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html). |