



## **Publication of 2016 Compliance Reports**

The Registrar of Financial Services Providers (Registrar) has published the compliance reports, determined under section 17(4) of the Financial Advisory and Intermediary Services Act, 2002 (Act), for the 2016 reporting period on the official web site of the Financial Services Board.

The content of the reports are informed by the 2015 compliance reports.

The following minor changes were made to the content of the reports:

- Amendments where there is reference to repealed or amended legislation;
- Deletion of questions for which the Registrar has record of on its database and can be verified by the Registrar;
- Rephrasing of questions to align to the wording in the Act; and
- Modification of questions which caused confusion when completing the reports.

It must be noted that, as per the previous reporting periods, category I FSPs that render financial services in respect of financial products belonging to long-term insurance sub-category A and/or friendly society benefits only, are excluded from submitting the 2016 compliance reports.



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### **Disclaimer**

*The FAIS Newsletter must not be construed as a substitution of the FAIS Act and subordinate legislation. The newsletter is aimed at addressing specified areas and provides a quick reference to the reader. It does not take away the obligations that are imposed on FSPs, key individuals, representatives, compliance officers or any person involved in the rendering of financial services to acquaint himself or herself with the provisions of the FAIS Act.*

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## THE DO'S AND DON'T'S OF DOFA ENQUIRIES

The [FAIS.Dofa@fsb.co.za](mailto:FAIS.Dofa@fsb.co.za) inbox is the dedicated inbox that has been established by the FAIS Division to deal with any Date of First Appointment (DOFA) related enquiries. This is more commonly referred to as the "DOFA inbox".

The inbox in question deals with exceptionally high volumes of e-mails on a monthly basis and there are certain Do's and Don'ts that the FAIS Division would like to communicate with the industry to ensure that all enquiries are dealt with as quickly and efficiently as possible.

Firstly, we would like to provide our readers with some insight into the number of enquiries dealt with by the DOFA team on a monthly basis:

Period	Number of e-mails received	Number of DOFA reports e-mailed
01/10/2015 – 31/10/2015	4 273	3 002
01/11/2015 – 30/11/2015	3 333	2 397
01/12/2015 – 31/12/2015	1 638	1 223
01/01/2016 – 31/01/2016	3 347	2 250
01/02/2016 – 29/02/2016	4 632	3 116
01/03/2016 – 31/03/2016	3 927	2 183
01/04/2016 – 30/04/2016	4 277	3 629

The **number of e-mails received** refers to the total number of e-mails that are submitted to the inbox on a monthly basis. An e-mail may have one or many enquiries included in the e-mail e.g. an individual may be requesting their own DOFA or an FSP may submit one e-mail with a list of DOFA reports that they require.

The **number of DOFA reports e-mailed** refers to where the individual concerned has been employed by a FSP in the past and has a DOFA. These figures do not include the queries that we receive where the person has not been employed by a FSP in the past (those without a DOFA).

All DOFA enquiries must be submitted to the DOFA inbox in order for the enquiry to receive attention. In instances where DOFA related enquiries are sent through to an administrative staff member's personal inbox these queries will be forwarded on the DOFA inbox in order for them to receive attention. Where requests are sent to an inbox other than the DOFA inbox it could result in a delay in responding to the e-mail.

It is important to note that all DOFA enquiries are dealt with on a strict First in First Out (FIFO) basis. This is done to ensure that no individual or organisation receives preferential treatment of any sort (each DOFA enquiry that is submitted is just as important as the next).

We would therefore request that persons making use of the DOFA inbox refrain from submitting the same DOFA enquiries multiple times as this will in no way result in a request being attended to faster – in reality it actually increases the response time as the administrative team are required to attend to the same query multiple times.

We do ask that where an individual is requesting their own DOFA information that they include their full names and identity number in the body of the e-mail. We often receive requests where the persons only provide their first names and surname and this is insufficient in order for the required checks to be done as there may be many individuals on the central representative register with the same or similar first name and surname.

Where a third party is requesting the DOFA information of a representative or key individual:

- they must **always** attached a signed consent letter wherein the individual concerned grants permission to the FAIS Division to release their DOFA information to the third party.
- we ask that the ID number and full names of the individual concerned are either reflected in the subject line or the body of the e-mail as the handwriting on the consent forms is not always legible which can result in an incorrect response



The DOFA team has found in the past that certain FSPs (generally the banks and insurers) instruct their employees to submit individual e-mails to the DOFA inbox in order for the employees to obtain a copy of their own DOFA record. We have no objection to FSPs instructing their employees to obtain their DOFA record however it does result in a delay in the turn-around time for responding to the DOFA other enquiries as there is an influx of enquiries.

We would like to remind compliance officers and key individuals that there is a DOFA report that can be generated by way of the FAIS online reporting system which will provides the DOFA date(s) for all key individuals and representatives of the FSP, and which also confirms whether the individual has passed their first level regulatory examination or not. Such a DOFA report can also be generated by the DOFA team if an e-mail request is sent to the DOFA inbox.

Generating this report would be a much more efficient method for the FSPs to obtain confirmation of their representative(s) and key individual(s) DOFA dates.

An example of the report is included below:

FINANCIAL SERVICES BOARD					
DATE	25/04/2016				
FSP 123: FOR DEMONSTRATION PURPOSES					
ID NO	NAME	DOFA	Key Individaul Examination	Representative Examination	Comment
1234567890123	Test Person 1	KI : 30/09/2004 Rep : 30/09/2004	RE1 : Passed	RE5 : Passed	
4567890123456	Test person 2	KI : 30/09/2004	RE1 : Passed	RE5 : Passed	
7890123456789	Test person 3	KI : 21/10/2008 Rep : 31/01/2005	RE1 : Passed	RE5 : Passed	

**IN A NUTSHELL:**



**Do's:**

- Send all DOFA related enquiries to [FAIS.Dofa@fsb.co.za](mailto:FAIS.Dofa@fsb.co.za) and not any other inbox
- Include the ID number and full names of the individual concerned in either the subject line or body of the e-mail (third party enquiries)
- Include your full names and identity number (where you are requesting your own DOFA information)

**Don'ts:**

- Submit a request for an individual's DOFA record without attaching a signed consent letter
- Send DOFA requests through to the administrative staff member's personal inboxes
- Submit the same DOFA request multiple times

# BULK TRANSFERS BY FSPs AND INSURERS

## BACKGROUND

The Office of the Registrar of Financial Services Providers (“Registrar”) has received a proliferation of queries and complaints relating to a business practice in the financial services industry, wherein Financial Services Providers (FSPs) have allegedly been moving books of policies between each other and/or between insurers, often without the consent and/or knowledge of policyholders.

In light of the above this Office conducted an investigation into the aforementioned allegations and the findings were that there were large numbers of policies moved in bulk between FSPs with no change in insurer and there were also large numbers of policies moved from one insurer to the next. It was noted however that the movement of books between FSPs did not always result in the movement of books between insurers. Conversely, it was also observed that the movement of books between insurers were not in all instances linked to a movement of books between FSPs.

Furthermore, according to the findings, in most cases the policyholders were merely notified of the movement of their policies without being provided with the option as to whether or not they want to move. Therefore in the aforementioned cases no consent was obtained from the policyholders prior to the transfers in question. In other cases policyholders did not receive any notifications nor did they provide consent to transfer their policies.



## APPLICABLE LEGISLATION

- **Financial Advisory and Intermediary Services Act (“FAIS Act”)**

In instances where the transfer of clients resulted in the change of the insurer it meant that there was a replacement of a financial product. The provision of section 8(1)(d) of the General Code of Conduct for Authorised Financial Services Providers and Representatives (“General Code”) applies which states that, *“a provider other than a direct marketer, must, prior to providing a client with advice where the financial product (“the replacement product”) is to replace an existing financial product wholly or partially (“the terminated product”) held by the client, fully disclose to the client the actual and potential financial implications, costs and consequences of such a replacement,…”*

According to the above provision it is obvious that a movement of a policy by the intermediary without the policyholder’s consent is prohibited even if the policy remains materially unchanged after the transfer. The FSP is required to obtain consent and disclose the implications to the client prior to moving the policy. Section 20(a)(ii) of the General Code in support of the above states that in relation to where the client makes the request on the advice of the provider to terminate the policy, the provider must take reasonable steps to ensure that the client fully understands all the implications of the termination of the policy.

Furthermore, in terms of section 3(3) of the General Code; *“a provider may not disclose any confidential information acquired or obtained from a client or, subject to section 4(1), a product supplier in regard to such client or supplier, unless the written consent of the client or product supplier, as the case may be, has been obtained beforehand or disclosure of the information is required in the public interest or under any law.”*

It is inevitable that confidential client's information will be disclosed to the insurer or the FSP during the process of transfer however this is prohibited, in terms of the aforementioned section, without the client's written consent.

*In terms of section 4(1) of the General Code "a provider other than a direct marketer must at the earliest reasonable opportunity, and only where appropriate, furnish the client with full particulars of the information about the relevant product supplier and, where such information is provided orally, must confirm such information within 30 days in writing.*

During the bulk transfer process, which results in a change of the insurer and in an instance where the consent of the client was not obtained, the client will in all probability not be aware of the new insurer. The above section therefore makes it mandatory for the clients to be informed regarding the insurer.

- **Long-term Insurance Act, No. 52 of 1998 ("LTIA") and Short-term Insurance Act, No. 53 of 1998 ("STIA")**

It is imperative that insurers ensure that all policyholders are aware of the cancellation of, or movement of, any policy by the insurer, underwriting manager, or intermediary. There are various different sections applicable to the cancellation and/or movement of policies in the LTIA, STIA and subordinate legislation. The insurance division within the FSB has done some investigations into current market practices relating to cancellations and the movements of policies.

It was concerning to find not only inconsistent interpretations of the requirements under the current legislation, but to also discover the confusion that still exists between insurers in respect of when to follow which procedure. It was therefore decided that an Information Letter in this regard will be issued

### ***Transfer of business***

Where an insurer transfers all or a part of its business to another insurer, such a transfer is governed by sections 36 and 37 of the LTIA and STIA, respectively. The transfer includes the transfer of assets and liabilities. An emerging practice has been noted whereby an insurer will bring an application to transfer all or part of its business even though no assets or liabilities are being transferred from that insurer to another. It appears that insurers sometimes adopt this approach to circumvent or avoid certain requirements, including the requirement to notify each individual policyholder of the impending cancellation and/or to obtain explicit consent for new cover with a new insurer.

Where policies are "moved" (in bulk or otherwise) from one insurer to another and no assets or liabilities are being transferred, any policies terminated by the existing insurer as part of the "moving" of such policies is subject to other legislative requirements (see below).

### ***Cancellation of assistance business group schemes***

The legislative requirements for the cancellation of policies by long-term insurers can be found in Rules 11 to 15 of the Policyholder Protection Rules ("PPRs") under the LTIA insofar as they relate to Assistance Business Group Schemes.

These Rules require, amongst other things, that cancellation of an agreement between either party (i.e. the insurer or an assistance business group scheme or administrator) is void unless the new insurer taking over the assistance business group scheme has issued a written confirmation to the previous insurer that the new insurer will underwrite the scheme.

For a cancellation to be effective, the parties must have informed the Registrar of the cancellation, before the cancellation took place, and all the individual policyholders (members of the group scheme) must have been notified of the cancellation.

### ***Unilateral cancellation of policies by a short-term insurer***

The requirements for the unilateral cancellation of policies by short-term insurers are set out in Rule 7.3 of the PPRs under the STIA. In terms of Rule 7.3, a short-term insurer may only cancel a policy unilaterally if it complies with the “notice requirement”. The notice requirement entails that an insurer must notify a policyholder that the insurer will unilaterally cancel the policyholder’s policy. This notice must be provided to the policyholder 30 days prior to the cancellation date. An insurer can provide this notice in one of three ways –

- (i) giving notice directly to the policyholder;
- (ii) relying on an independent intermediary to give the notice to the policyholder, in which case the insurer must be satisfied that the notice has indeed been given to the policyholder in accordance with the notice requirement; or
- (iii) if the options in (i) or (ii) is not possible, an insurer can issue a publication of the proposed cancellation in two editions of a newspaper circulating in all areas in which it is reasonably believed that relevant policyholder(s) reside. The insurer must forward the proposed publication to the Registrar of Short-term Insurance prior to publication.

### ***Unilateral cancellation of policies related to the cancellation of a binder agreement***

Section 49A under the LTIA and section 48A under the STIA, read together with Part 6 of the Regulations under the LTIA and STIA, refers to binder agreements and speaks to, amongst other things, the requirements relating to oversight by insurers, the process of sharing information and the process of cancelling binder agreements that may result in the cancellation and subsequent movement of policies.

In terms of Directive 151 A.i (ST) dated 31 March 2010, it is the responsibility of the short-term insurer to submit information contained in Annexure A of Directive 151.A.i (ST) to the FSB 60 days prior to cancelling a binder agreement. If the cancellation of the binder agreement will also result in the unilateral cancellation of policies by the short-term insurer, additional information set out in Annexure B of Directive 151.A.i (ST) must be submitted to the FSB. These additional reporting requirements are also relevant to long-term insurers notwithstanding the fact that a specific Directive has not been issued under the LTIA.

It is expected that pursuant to the new Information Letter referred to above, Directive 151 A.i (ST) will be withdrawn and new notification forms for long- and short-term insurers will be introduced.

#### **• Protection Of Personal Information Act**

Furthermore the FSPs will be required to comply with Protection of Personal Information (“POPI”) Act, which demands identifying Personal Information and taking reasonable measures to protect the data. This will likely reduce the risk of data breaches and the associated public relations and legal ramifications for the organisation.

The purpose of the POPI Act will be to ensure that all South African institutions conduct themselves in a responsible manner when collecting, processing, storing and sharing another entity's personal information by holding them accountable should they abuse or compromise your personal information in any way.

Section 12c of the General Code states that a provider, excluding a representative, must, without limiting the generality of section 11, structure the internal control procedures concerned so as to provide reasonable assurance that all applicable laws are complied with. Therefore non-compliance with the POPI Act will result in the FSP’s failure to comply with the provisions of the FAIS Act.

## **PROCESS TO BE FOLLOWED DURING TRANSFER OF POLICIES IN TERMS OF FAIS**

The FSP is required in terms of the General Code to have appropriate procedures and systems in place to record verbal and written communications relating to the financial service rendered to a client. Therefore, in order to mitigate risk and to protect the rights of the clients, the client's consent should be obtained in writing or through voice recordings if the transaction occurs telephonically.

The outcomes contained in the Treating Customers Fairly ("TCF") Framework should be incorporated by all, the FSP and the Insurers in order to ensure that the policyholders are adequately protected when there is a transfer.

### **ADDITIONAL INSURER'S DUTIES AND TCF CONSIDERATIONS**

If the cancellation of policies results in the "movement" of policies to a new insurer, the new insurer must ensure that each policyholder has explicitly consented to entering into a new policy with the new insurer.

Record should be kept of all movements in the books of the insurer, including transfers of books of business from and to the insurer.

In future, it is envisaged that insurers will be required to formally report on the movement of books of policies in the proposed Conduct of Business Returns which are planned to be introduced during 2016.



## **RETAIL DISTRIBUTION REVIEW**

The FSB's status update on the Retail Distribution Review ("RDR") published in November 2015 also proposes additional requirements to be implemented in respect of short-term insurance cover cancellations. The proposed requirements will affect both intermediaries and insurers.

From an intermediary perspective it is proposed that explicit customer consent (as opposed to tacit, assumed or "negative" consent) will be required when a policy is cancelled.

From an insurer's perspective it is proposed that where an insurer cancels a policy the existing insurer will remain on risk for the shorter period of –

- (i) a period of 30 days after the date on which the existing insurer receives proof that the policyholder becomes aware that the policy will be cancelled; or
- (ii) the period until the existing insurer receives proof that the customer has secured a new policy.

### **REGULATORY ACTION**

FSPs who do not comply with the requirements of the General Code will be in contravention of the FAIS Act and regulatory action will ensue.

When POPI Act comes into effect, non-compliance with the Act could expose the Responsible Party to a penalty of a fine and / or imprisonment of up to 12 months. In certain cases the penalty for non-compliance could be a fine and / or imprisonment of up to 10 years.

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# THE REGISTRAR ISSUES A WARNING: COMPLY WITH THE “15 DAYS” NOTIFICATION REQUIREMENT

In terms of **section 8(10)(a)(ii) of the FAIS Act**,

*“Where a provider is a corporate or unincorporated body, a trust or a partnership, the provider must – within **15 days** of the appointment of a new director, member, trustee or partner, inform the Registrar of the appointment and furnish the Registrar with such information on the matter as the Registrar may reasonably require.”*

Furthermore licencing condition 1 clearly states *“The financial services provider must inform the Registrar in writing, by facsimile or in an appropriate electronic format, within **15 days** after the change has taken place, of any change in respect of business information of the financial services provider as provided in Form FSP1, FSP3, FSP4, FSP9, FSP10, FSP10A or FSP11, respectively, of the Application Form which was submitted by the provider for purposes of obtaining a licence, and in particular relating to the provider's representatives, auditor, compliance officer or any foreign clearing firm or foreign forex service provider involved (if any) and nominee company or independent custodian involved or the shareholders, directors or trustees of any such company or custodian (If any).”*

It has been noted that a number of FSPs do not notify the Registrar of the above changes within the prescribed period. Such non-compliance is often picked up during the course of processing other license amendments (“profile changes”) on the request of the FSPs. The office of the Registrar then engages the FSPs concerned on the non-compliance and it is only then that the FSP’s records are duly updated.

One of the key responsibilities of the FAIS department is to monitor, on an on-going basis, compliance with the requirements of the FAIS Act. The office of the Registrar has made available various convenient platforms to enable FSPs to update their records with ease; and these include:

- The online representative register;
- Email facility: [faispfc@fsb.co.za](mailto:faispfc@fsb.co.za) ;and
- The online profile change system.

Non-compliance with this requirement is viewed in a serious light. As such, the industry is hereby informed that the Registrar of FSPs will henceforth, **impose a penalty** on the FSPs who fail to adhere to this requirement as she deems fit. We therefore urge all FSPs to comply with the requirement in order avoid such penalties.





# COMPETENCY FRAMEWORK REVIEW

The consultation process regarding the competency framework is still in progress. The objective of this review is to build on the existing FAIS “fit and proper” competency requirements by establishing an effective and proportionate regulatory framework to ensure advisers and other intermediaries have the right levels of competence, namely product related knowledge, appropriate standards of professionalism and undergo continuous professional development where necessary.

The development of appropriate standards for different levels of technical knowledge – including standards for financial planners and standards for advisers in so-called simple products models – will also be dealt with through this work.

Wider industry consultation will take place as soon as the FSB has developed a draft for further discussion.



## CONTINUOUS PROFESSIONAL DEVELOPMENT (CPD)

CPD is one of the components currently under discussion in the review process, and it certainly is an interesting topic. It is evident from the various definitions for CPD, that there are various interpretations, and that the terminology used going forward will be important to ensure that the CPD requirements set by the FSB is interpreted correctly.



Most professionals regard CPD as a series of various activities (formal and informal) that takes place after competency in a specific field was achieved, with the only purpose to keep the acquired knowledge and skills up to date with any changes that may take place over time.

This could include attending industry specific seminars or reading articles on relevant topics.

Other definitions are broader with reference made to “life-long learning” which suggest that the initial learning process where competency was achieved, simply continues. This could include completing a post-graduate qualification, or attending relevant workshops.

So it is therefore important to bear in mind what should be achieved with CPD, i.e. to maintain, enhance or develop existing competencies throughout a professional career in order to meet the needs of the profession and the industry.

When one really think about all the various opportunities through which knowledge and skills could be maintained, enhanced, or developed, then the possibilities of what type of activities could be recognised for CPD purposes, are endless. It is therefore important that CPD should be planned as a structured process where one systematically addresses specific focus areas of knowledge and skills over a specified period.

We look forward to the consulting with industry regarding this topic, and we are confident that the consultation process will contribute to a more robust CPD framework for financial advisors.



## REGULATORY EXAMINATION CERTIFICATE FRAUD



The FSB has encountered numerous cases of regulatory examination certificate fraud over the last five years. Regulatory action was taken against each of these individuals and they were debarred for breaching the honesty and integrity requirement.

It is important to note that the security measures in place to detect regulatory examination certificate fraud is of the highest standard, and no fraudulent certificate will go undetected once the certificate is used for compliance or job application purposes.

It is therefore important to consider the consequences before attempting to commit certification fraud, and what impact this would have on possible job opportunities and a career in the financial services sector.

## CONTACT DETAILS

### FSB Call Centre:

Are you aware that the Financial Services Board has a Call Centre / Contact Centre that is dedicated to resolving all your queries? The following toll free numbers may be used to contact the FSB Call Centre:

- 0800110443
- 0800202087

### Website :

All the important information applicable to financial services business is posted on our website. You are encouraged to frequently visit our website for latest information and updates. Our website address is [www.fsb.co.za](http://www.fsb.co.za).

On the FSB homepage select "FAIS" from the drop down list of departments.

E-MAIL INBOX	PURPOSE
<a href="mailto:Faisinfo@fsb.co.za">Faisinfo@fsb.co.za</a>	General FAIS related enquiries.
<a href="mailto:Faispfc@fsb.co.za">Faispfc@fsb.co.za</a>	Submission of profile change requests specifically relating to FSPs.
<a href="mailto:Reps@fsb.co.za">Reps@fsb.co.za</a>	Submission of the excel rep import spread sheet. This e-mail address should <b>only</b> be used where the person submitting the excel spreadsheet is registered to submit on behalf of the FSP.  Where the person is not registered to submit an excel spreadsheet on behalf of the FSP then the request should be sent to the <a href="mailto:faispfc@fsb.co.za">faispfc@fsb.co.za</a> inbox.
<a href="mailto:Fais.Lapse@fsb.co.za">Fais.Lapse@fsb.co.za</a>	Submission of any requests to lapse licenses and enquiries relating to lapse requests that have been submitted.
<a href="mailto:Fais.Licensecopies@fsb.co.za">Fais.Licensecopies@fsb.co.za</a>	Requests for duplicate copies of FAIS licenses and annexures. Please ensure that proof of payment accompanies the request for a duplicate license copy.
<a href="mailto:Fais.Newlicense@fsb.co.za">Fais.Newlicense@fsb.co.za</a>	E-mail submissions of new license applications for FSPs.
<a href="mailto:Fais.COapprovals@fsb.co.za">Fais.COapprovals@fsb.co.za</a>	E-mail submissions for application for phase 1 approval of compliance officers.
<a href="mailto:Fais.Mandates@fsb.co.za">Fais.Mandates@fsb.co.za</a>	Submission of specimen mandates for approval.

E-MAIL INBOX	PURPOSE
<a href="mailto:Fais.Exams@fsb.co.za">Fais.Exams@fsb.co.za</a>	All queries relating to the regulatory examinations e.g. queries related to duplicate certificates, how to register for exams, authentication etc.
<a href="mailto:Fais.Qualifications@fsb.co.za">Fais.Qualifications@fsb.co.za</a>	Queries relating to qualifications e.g. credits, recognition of qualifications.
<a href="mailto:Fitandproper@fsb.co.za">Fitandproper@fsb.co.za</a>	Queries relating to the Fit and Proper Requirements e.g. new entrants wanting to know what competency requirements they have to meet.
<a href="mailto:Fais.Compliance@fsb.co.za">Fais.Compliance@fsb.co.za</a>	Submission of documents and queries in response to an intention to suspend or suspension letter sent to an FSP.
<a href="mailto:Faisfins2@fsb.co.za">Faisfins2@fsb.co.za</a>	Extension requests for the submission of annual financial statements.
<a href="mailto:Faisfins3@fsb.co.za">Faisfins3@fsb.co.za</a>	Extension requests for the submission of annual financial statements.
<a href="mailto:Faiscomp1@fsb.co.za">Faiscomp1@fsb.co.za</a>	Queries on compliance reports and queries related to the FAIS online reporting system.
<a href="mailto:FaisComplaints@fsb.co.za">FaisComplaints@fsb.co.za</a>	Submission of FAIS related complaints against key individuals, representatives and FSPs.
<a href="mailto:Debarment@fsb.co.za">Debarment@fsb.co.za</a>	Submission of debarment notifications relating to representatives.
<a href="mailto:Fais.Exemptions@fsb.co.za">Fais.Exemptions@fsb.co.za</a>	Submission of exemption applications for exemptions specific to a person or FSP.
<a href="mailto:Fais.Examexemptions@fsb.co.za">Fais.Examexemptions@fsb.co.za</a>	Submission of excel spread sheets to register for the regulatory examination exemptions that published under Board Notice 102 of 2012.
<a href="mailto:Fais.conditions@fsb.co.za">Fais.conditions@fsb.co.za</a>	Submission of proof that conditions associated with exemptions that were granted have been complied with.
<a href="mailto:Fais.Dofa@fsb.co.za">Fais.Dofa@fsb.co.za</a>	Submission of DOFA related enquiries and requests for DOFA reports.