financial intelligence centre

REPUBLIC OF SOUTH AFRICA

USER GUIDE FOR SUBMITTING A SUSPICIOUS ACTIVITY REPORT (SAR) ON THE REGISTRATION AND REPORTING PLATFORM OF THE FINANCIAL INTELLIGENCE CENTRE WITH EFFECT 25 APRIL 2016

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financial intelligence centre

REPUBLIC OF SOUTH AFRICA

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http://www.fic.gov.za/Secure/Queries.aspx

Objective of this user guide

The objective of this user guide is to define and outline the steps to be followed when submitting a Suspicious Activity Report (SAR) to the Financial Intelligence Centre (the Centre) in terms of section 29(1)(a) or (c) of the FIC Act. Please note that the reporter must acquire login credentials on the Centre's registration and reporting platform in order to access the reporting platform. Please refer to Public Compliance Communication 05A for further guidance on registration on the registration and reporting platform.

This user guide is applicable to a person who carries on a business or is in charge of or manages a business or is employed by a business and includes all accountable institutions listed in Schedule 1 to the FIC Act and all reporting institutions listed in Schedule 3 to the FIC Act.

Access to the reporting platform

In order to submit SAR to the Centre, the institution must access the portal provided by the Centre for this purpose on the Centre's website at **www.fic.gov.za**.

Legal Disclaimer

The Centre reserve the right to amend, modify or change the contents of this document.

Definitions

The guideline must be read in conjunction with the FIC Act and the Regulations in relation to the definitions of terms. In this guideline, unless the context indicates otherwise:

"AI/RI" refers to an Accountable Institution (listed in Schedule 1 to the FIC Act) and Reporting Institution (listed in Schedule 3 to the FIC Act).

"Business" refers to organisation or entity (ies) and can be used interchangeably.

"S43CO" refers to person who is tasked to submit reports to the Centre.

''FIC Act'' refers to the Financial Intelligence Centre Act, 2001 (Act No 38 of 2001), as amended.

"Regulations" refer to the Money Laundering and Terrorist Financing Control Regulations made in terms of section 77 of the FIC Act and promulgated in Government Notice 1595 of 20 December 2002 as amended.

"goAML refers to the an integrated software solution implemented by the Centre as its preferred IT platform for registration, reporting, data collection, analysis, case management and secure communications required for the Centre's daily operational functions and requirements.

"SAR" refers to a suspicious or unusual activity report submitted in terms of Section 29(1)(a) or (c) of the FIC Act.

Important information to remember when reporting on the Centre's reporting platform:

- Accountable and reporting institutions must register in terms of section 43B of the FIC Act before a SAR can be submitted. Please refer to Public Compliance Communication 05A and other relevant user guides on registration on the registration and reporting platform.
- All fields with an asterisk (*) are mandatory and should be completed.
- The user needs to consider business rules applicable to the various reports when reporting and apply them along with the applicable regulations and sections of the FIC Act.
- All First Letters must be in Capital Letter;
- Words typed in ALL Capital Letters are not allowed.

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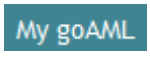
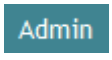
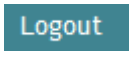
1. Introduction

The Centre is implementing an integrated software solution as its preferred platform for registration, reporting, data collection, analysis, case management and secure communications required for the Centre's daily operational functions and requirements. The new registration and reporting platform is called goAML. A person who carries on a business or is in charge of or manages a business or is employed by a business, including all accountable institutions listed in Schedule 1 to the FIC Act and all reporting institutions listed in Schedule 3 to the FIC Act have an obligation to suspicious activity reports (SAR) to the Centre in terms of section 29(1)(a) or (c) of the FIC Act and must utilise goAML for submitting SAR to the Centre.

goAML is accessible by going to the Centre's website, www.fic.gov.za, and selecting the reporting functionality.

2. goAML Web Icons

Icons	Description
	Add
	Add the captured detail
	Cancel instructs goAML not to capture the detail
	Close
	Preview
	Print
	Refresh
	Remove the uploaded document
	Upload a document
	Save
	Save a report
	Submit a report
	Shows the number of attached documents
	Upload XML and web reports
	Access drafted and submitted reports
	View submitted reports
	Access mail messages on goAML
	**Change password and user details**
	**Access statistics**
	**Logout of goAML**

3. Suspicious Activity Report (SAR) Baseline Scenario

The below process flow diagram demonstrates the end to end process of uploading a Suspicious Activity Report (SAR). This diagram is given greater detail in the content below. Fields in the flow diagram are labelled A to G.

3.1 Field Definitions

- Report type (A) – The type of report (i.e. SAR)
- Reporting Person and Location (B)
    - Reporting Person - Linked to the logged in user details, this is the person uploading the SAR;
- Location - Describes the actual geographical area / branch where the unusual / suspicious activity / transaction(s) occurred. The address of the logged in user, is populated with selected report for capturing. The logged in user must edit or delete the address, if the populated address is not the actual location of where the transaction (series of transactions) and/or unusual/suspicious activity occurred.
- Indicators (C) – Refers to the relevant section of the FIC Act in terms of which the report is being made. An indicator in relation to SAR means the type of report submission.
- Activity (D) - means a transaction has not been concluded between a client and an accountable institution. An activity is based on suspicion.
- Reporting Parties (E) - Can either be a person / Account / Entity
- Person / Entity / Account (F)
    - Person- this refers to a natural person.

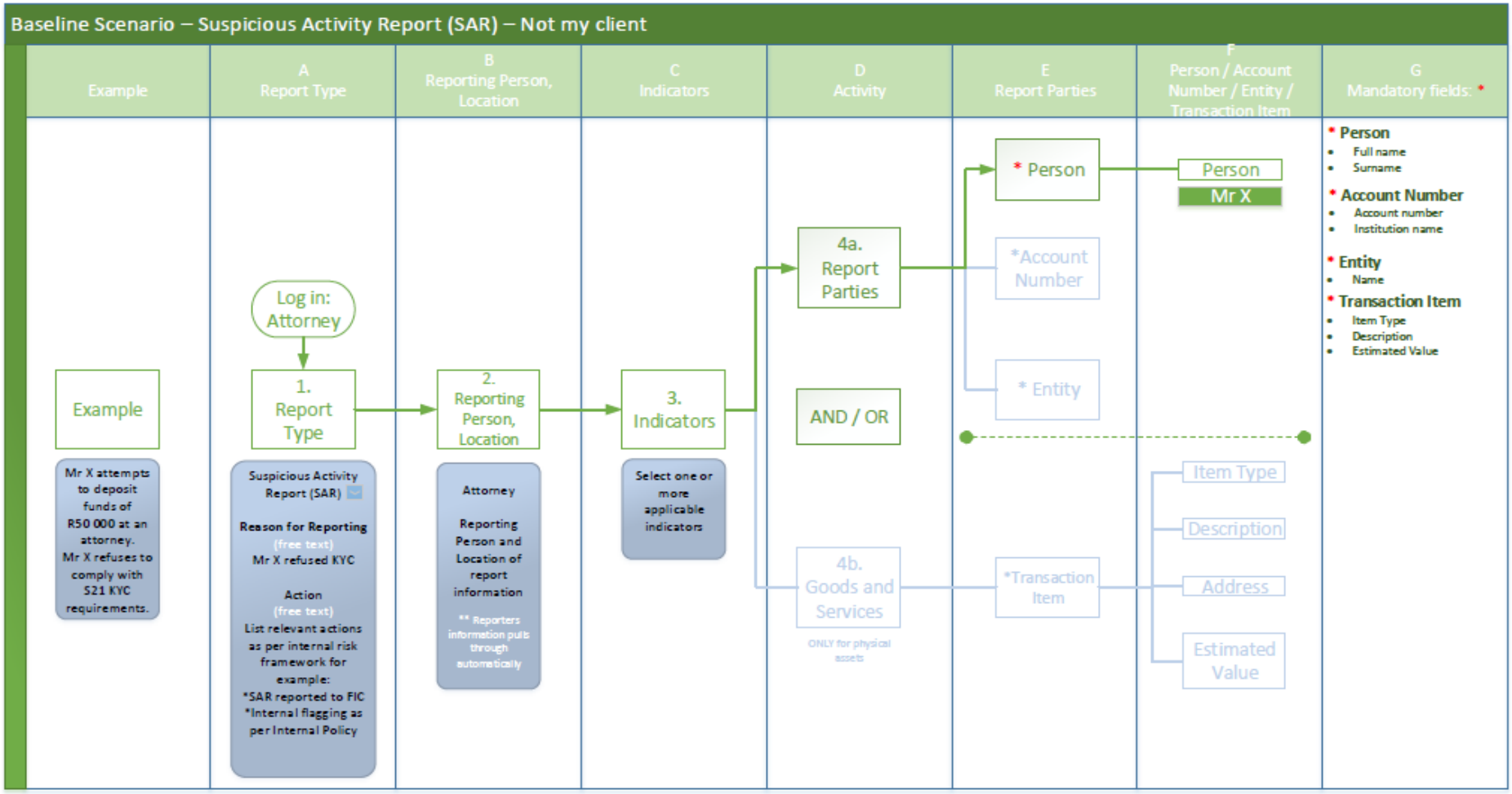
      Note: If a person physically receives or pays cash, “person” is selected
    - Entity- this refers to a legal person. Note that there is a natural person that will always be linked to an entity (i.e. The signatory).

      Note: If an entity physically receives or pays cash, “entity” is selected.
    - Account- this refers to an account held with an accountable or reporting institution (e.g. Cheque account held with a bank).

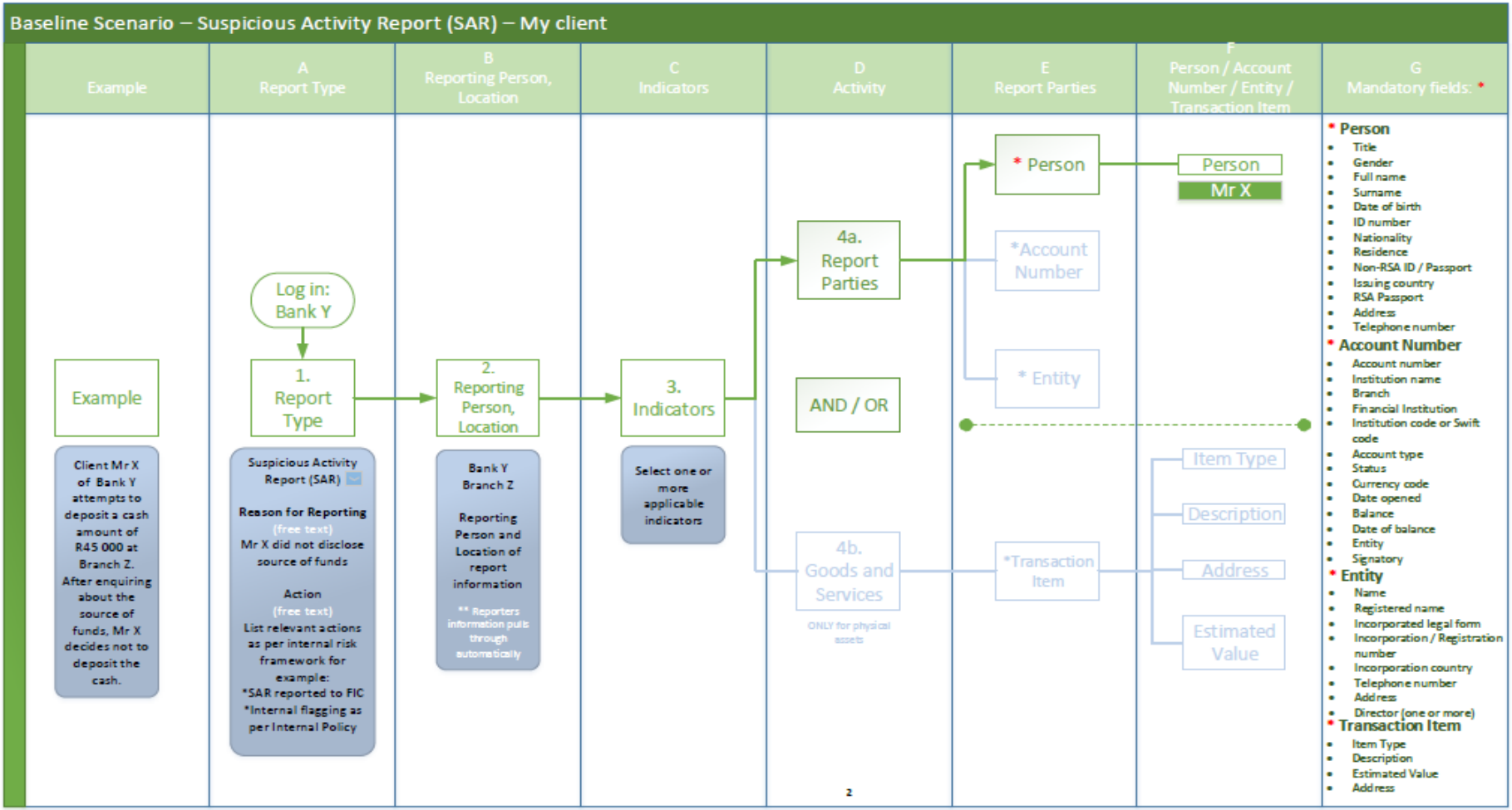
      Note: When cash is deposited or withdrawn to/from an account, then “account” will be selected.

- Mandatory Fields (G) – this refers to the fields that are compulsory to be completed. The information that is required is dependent on the fields selected in field G (i.e. Person / Entity / Account).

3.2 Baseline scenario for submitting suspicious activity report (SAR) to the Centre where the person is NOT the client of the AI/RI – displaying fields A to G to be completed



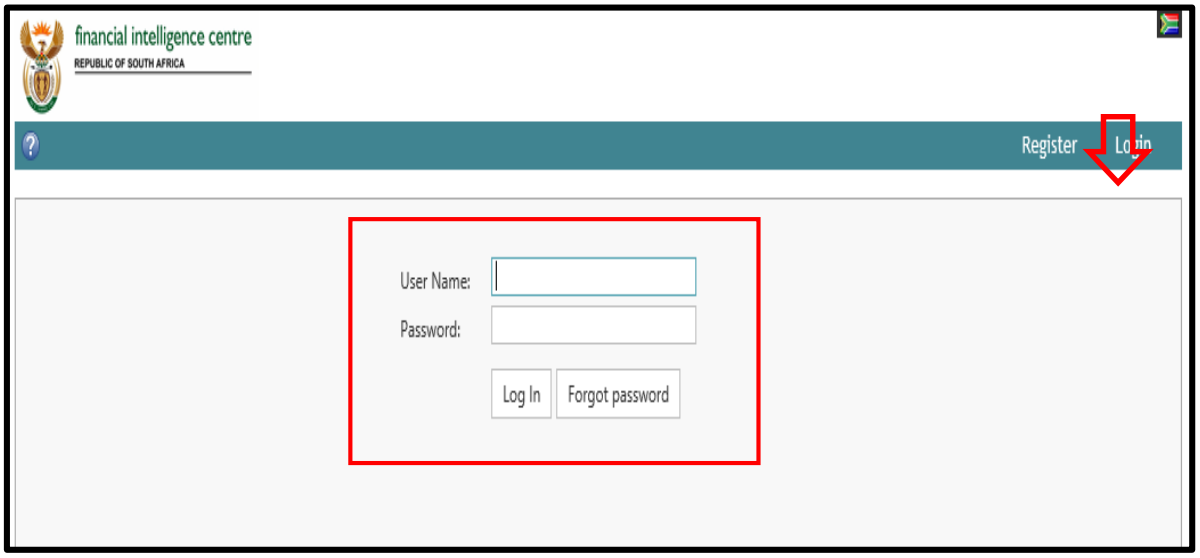
3.3 Baseline scenario for submitting suspicious activity report (SAR) to the Centre where the person is the client of the AI/RI – displaying fields A to G to be completed



4. Accessing goAML

Accountable and reporting institutions can access the goAML platform by utilising the username and password captured during the registration process. Authentication will always be required before gaining access to goAML.

- Go to the Centre's website, www.fic.gov.za
- Access goAML page by clicking on reporting forms; OR access the link directly by using **http://cengoweb01/goAMLWeb_PRD/Home**.
- Click on the **Login** link
- Enter your user name in the standard format captured during registration.
- Enter your password in the standard format of Case sensitive, Alpha Caps, Alphanumeric, numeric & Char e.g. Test12345@ and click **Log In** button to proceed.

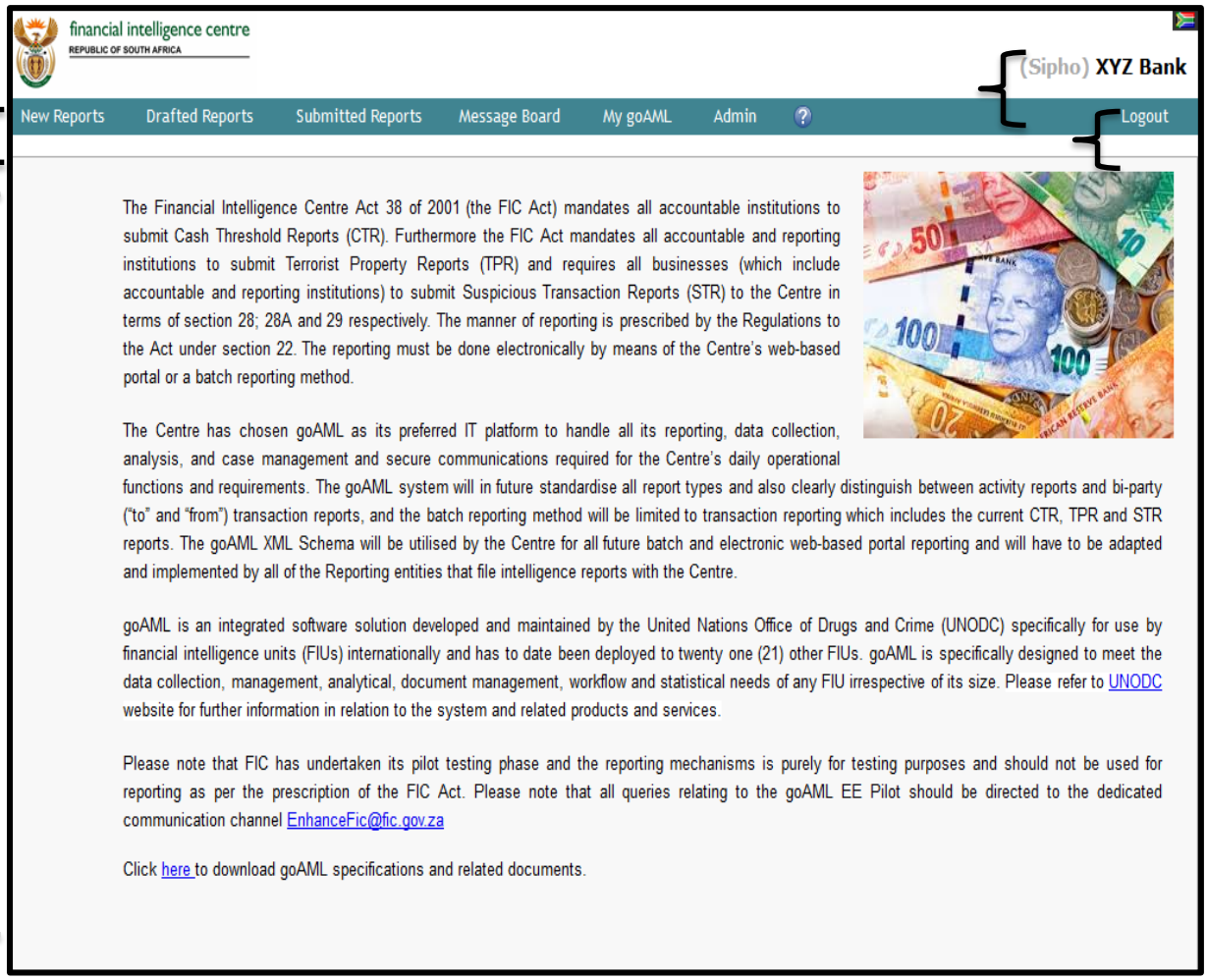


Caution: Remember to keep your username and password safe.

4.1. goAML platform landing page

The landing page has the following visible items

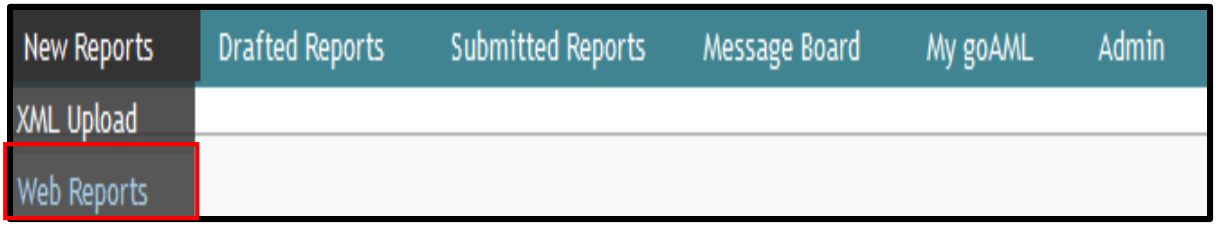
- **Logged in user details** - details which user is logged in for which institution (e.g. Sipho from XYZ Bank).
- **Menu Bar** - contains **New Reports** / Drafted Reports / Submitted Reports / Message Board / MygoAML / Admin / Help / Logout, clicking any of the link item will give a user access to the functionality required (i.e. clicking message board populates the message board).
- **Information Bar –** contains the FIC information with links to download goAML documentation.
- **Logout –** allows you to logout as a user.



5. Capturing a Suspicious Activity Report

5.1 Select a new Report

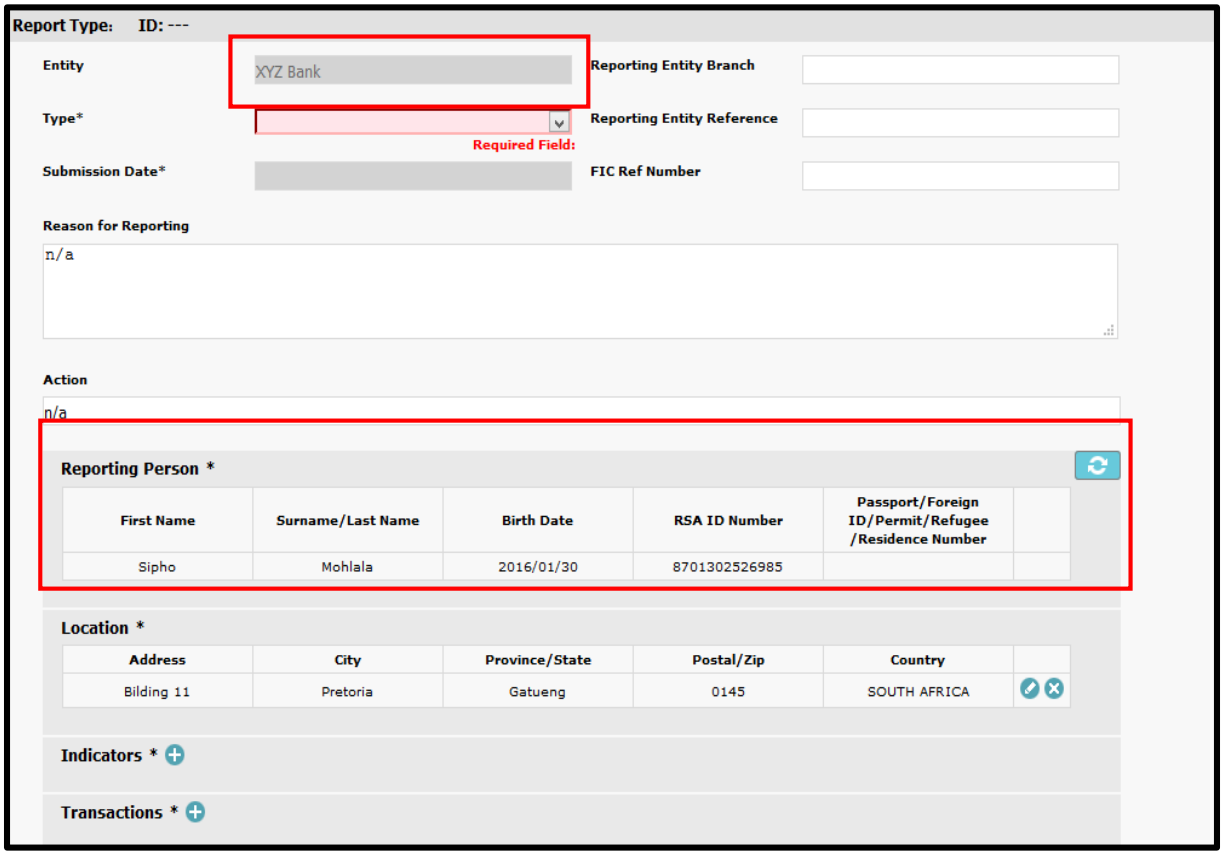
- The link for uploading reports is accessible by hovering the mouse pointer on the menu bar; **New Reports** > click **Web Reports**



- Once selected, a general reporting template will be generated.

5.2 Reporting template- overview

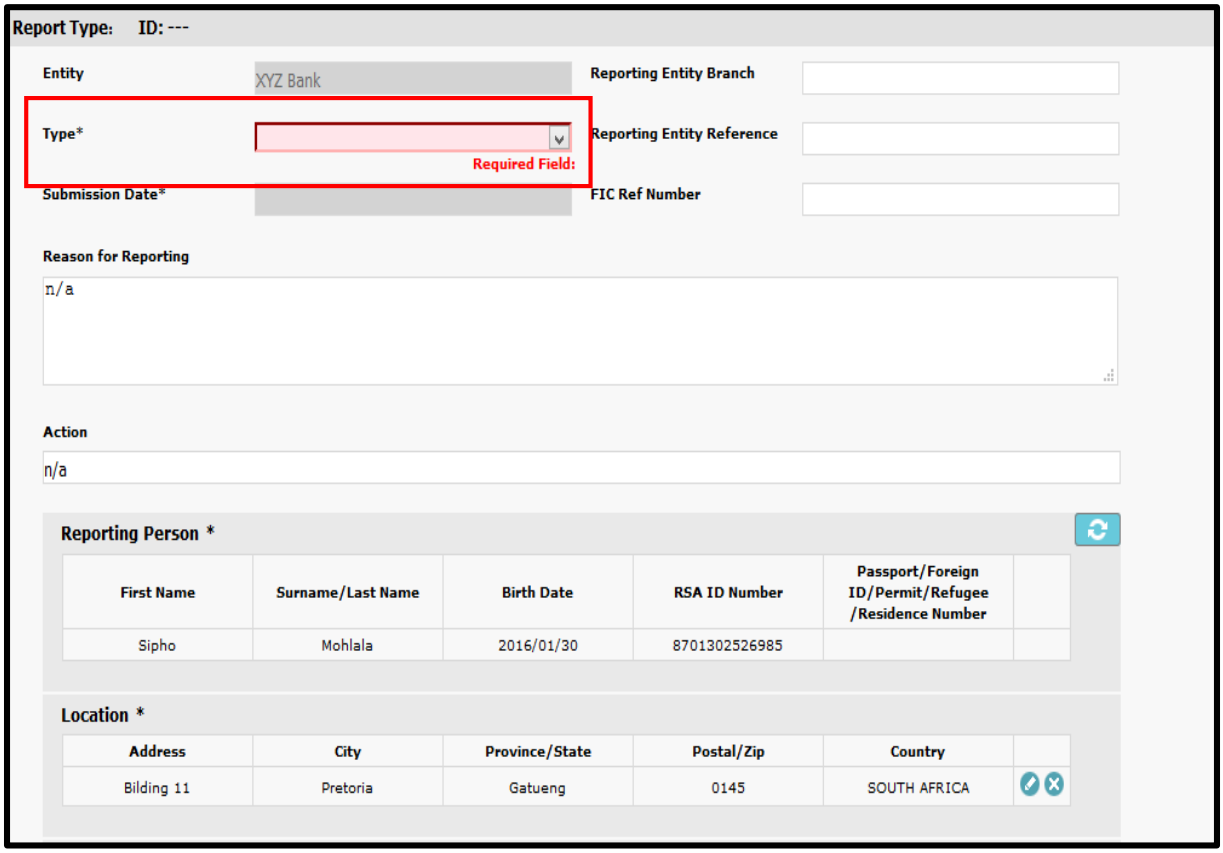
The form for creating new reports is loaded and displayed. The form fields **Entity** and **Reporting Person** are automatically completed and cannot be changed. The Reporting Person details are linked to the logged in user details.



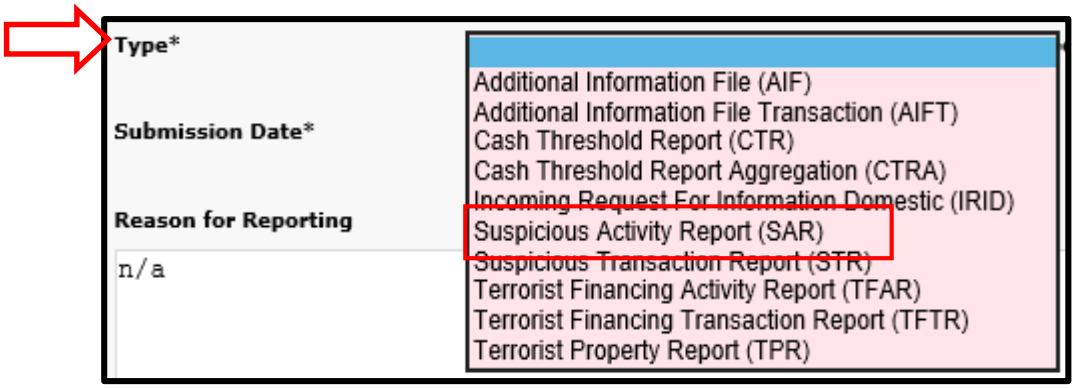
BASELINE SCENARIO FIELD A – REPORT TYPE

5.3 Select Report Type

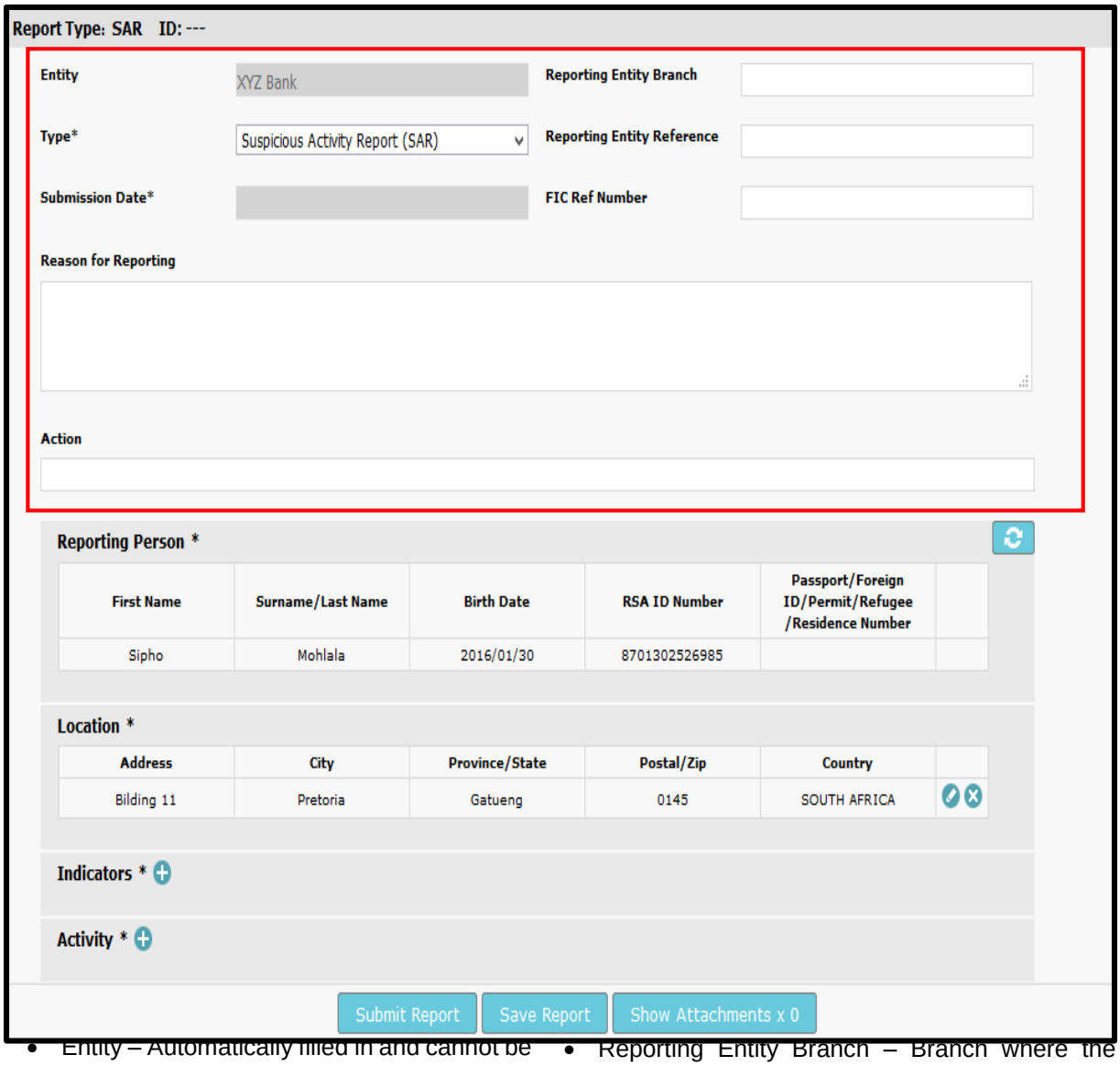
- The type of report to be submitted is selectable from the **Type** drop down list, each report will have unique fields i.e. transactional reports fields will differ from activity report fields



- To capture a SAR, select from the **Type** drop down list > select **Suspicious Activity Report**



Report Type window populates with the following fields:

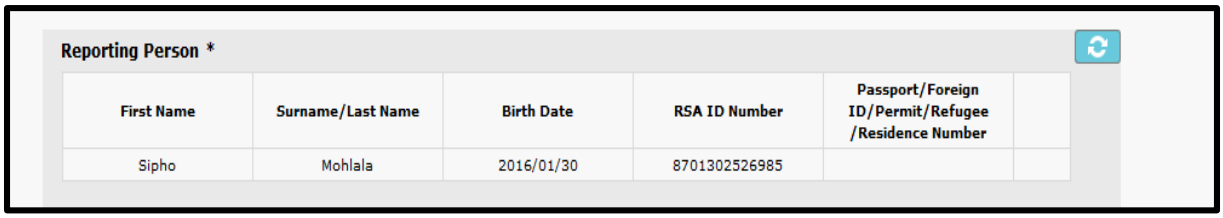


- Entity – Automatically filled in and cannot be changed (Linked to Login ID)
- Type – Type of Report (e.g. SAR)
- Submission Date – Automatically generated once the report is submitted.
- Reason for Reporting (mandatory) - Grounds for suspicion
- Action (mandatory) - Action taken (e.g. Reported the activity to Law Enforcement)
- Reporting Entity Branch – Branch where the transaction took place (mandatory)
- Reporting Entity Reference – Reporting Entity internal transaction reference number
- FIC Ref Number - This field is for resubmitting failed / rejected reports and needs to reference the original report number issued by the FIC

BASELINE SCENARIO B – REPORTING PERSON AND LOCATION

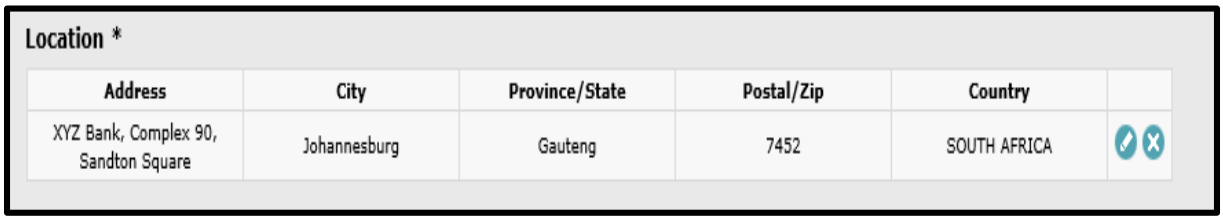
5.4 Reporting Person

- Reporting Person - Full details of the report's reporting person automatically filled in (Linked to Login ID)



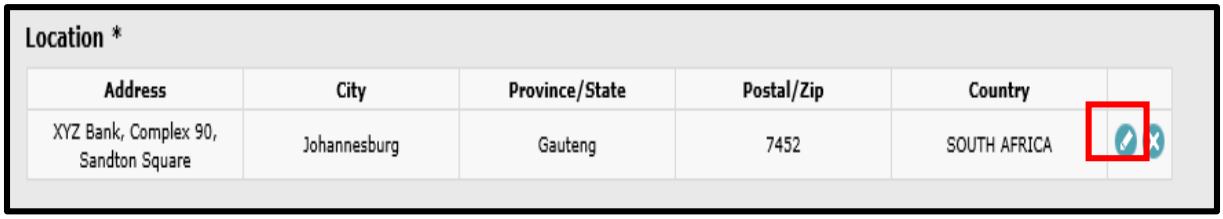
5.5 Location

Describes the actual geographical area / branch where the transaction or series of transactions occurred. The address of the logged in user is pre-populated with the address of the registered profile. The logged in user must edit or delete the address if the populated address is not the actual location of where the transaction (series of transactions) activity occurred.



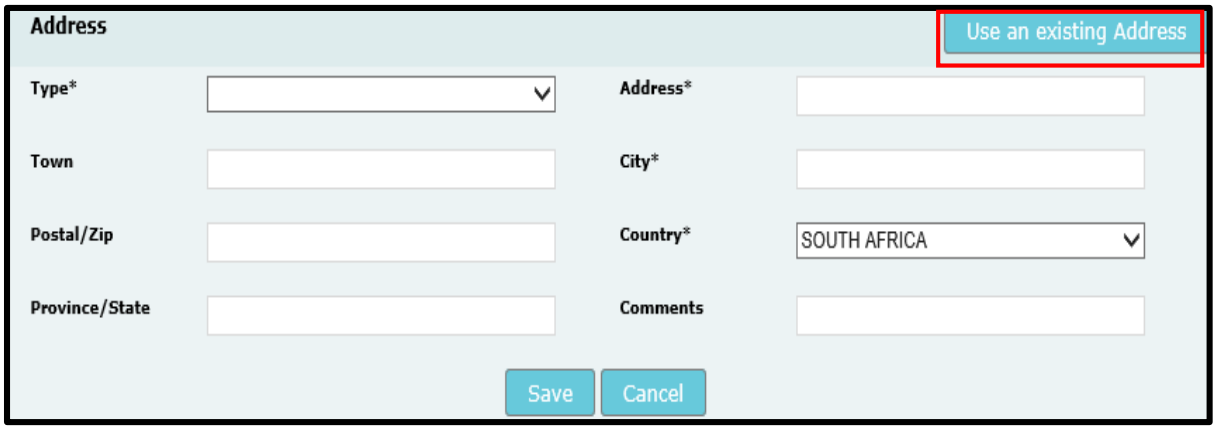
5.6 Editing the location

- Clicking the edit icon



- Address form populates > Edit the fields

The **"Use an existing Address"** button is used to populate Address information that was already captured on the web session on goAML



- Type – It can be Business, Operational, Private, Public, Unknown
- Town – Name of town / district as part of a city Postal / Zip – The postal code of the city
- Province / State – Name of the province
- Address – Physical Address - details like street name, house number etc.
- City – Name of the city
- Country – Name of the country
- Comments – If any

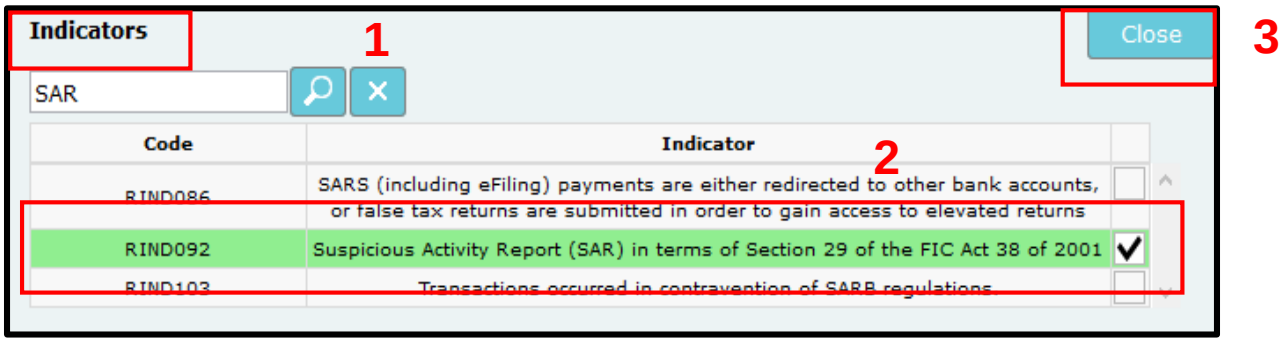
BASELINE SCENARIO FIELD C – INDICATORS

5.7 Indicators

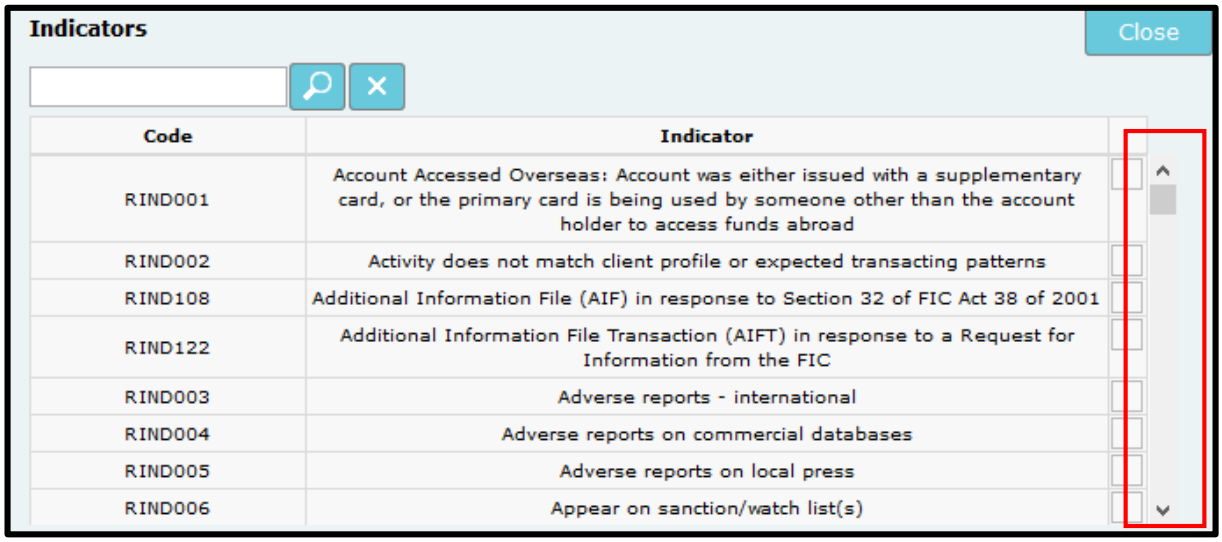
Indicators are classification for the report. More than one "**Report Indicator**" may be provided. To select the appropriate indicator:

- Click **Add** to select the appropriate indicator for the report

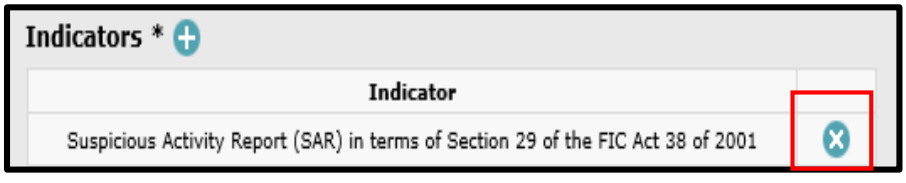
- Type in the **Indicator Code >** click **Search Button** > select by checking the **Indicator** > **Close.**



- Or **Scroll** > select by checking the **Indicator > Close.**



- The selected **Indicator** will be displayed on the form. Click **X** to delete the searched indicator



Whilst multiple report indicators may be provided, a business rule exists that indicates that a minimum of one report indicator per report must be included.

BASELINE SCENARIO FIELD D – ACTIVITY

5.8 Activity

An **Activity** form represents an event where a list of subjects (person / account / entity) and goods and services are related directly to the report without the need of a transaction:

- Click **Add** button to capture activity details for the report and details of the report need to be completed

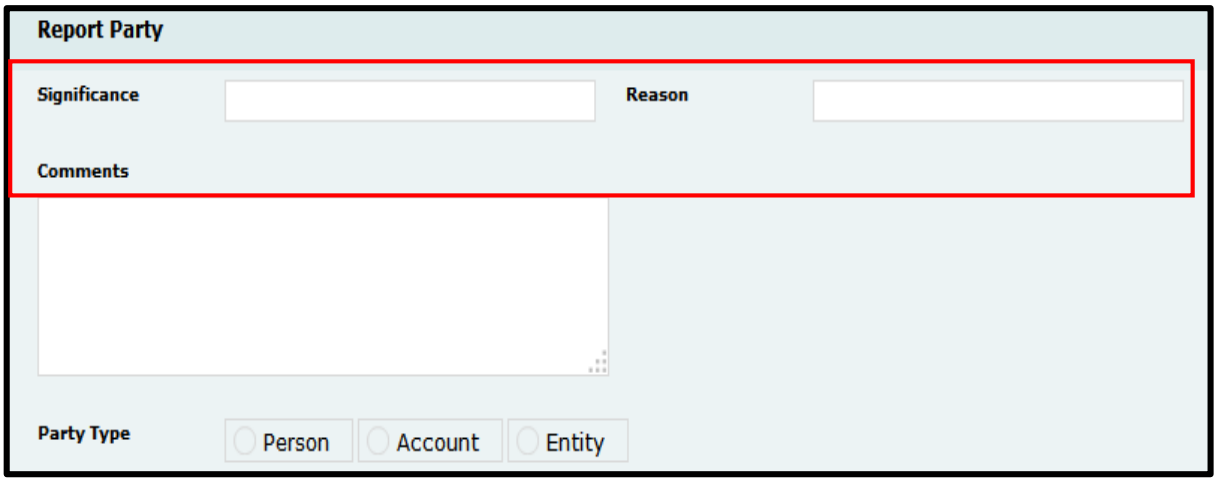
- Clicking the **Activity** add button generates the activity form and details of the report need to be completed. Two fields are generated > **Report Parties** and **Goods and Services**

BASELINE SCENARIO FIELD E – REPORTING PARTIES

5.9 Reporting Parties

Report parties represents a collection of involved subjects (Account (s) / Entity (ies) / Person (s)) for the activity report. To capture the details of the involved parties

- Click **Report Parties** add button > The **Report Party** form populates. Complete the reporting party details, at least one party should be included



- Significance - The significance value refers to the scale of involvement of a person. If a person's significance value is 9, it means this subject is highly involved in a transaction whereas, a subject will value 2 is mildly involved
- Reason – Why the subject is involved in the current report
- Comments – If any

BASELINE SCENARIO FIELD F – PARTY TYPE (PERSON / ACCOUNT / ENTITY)

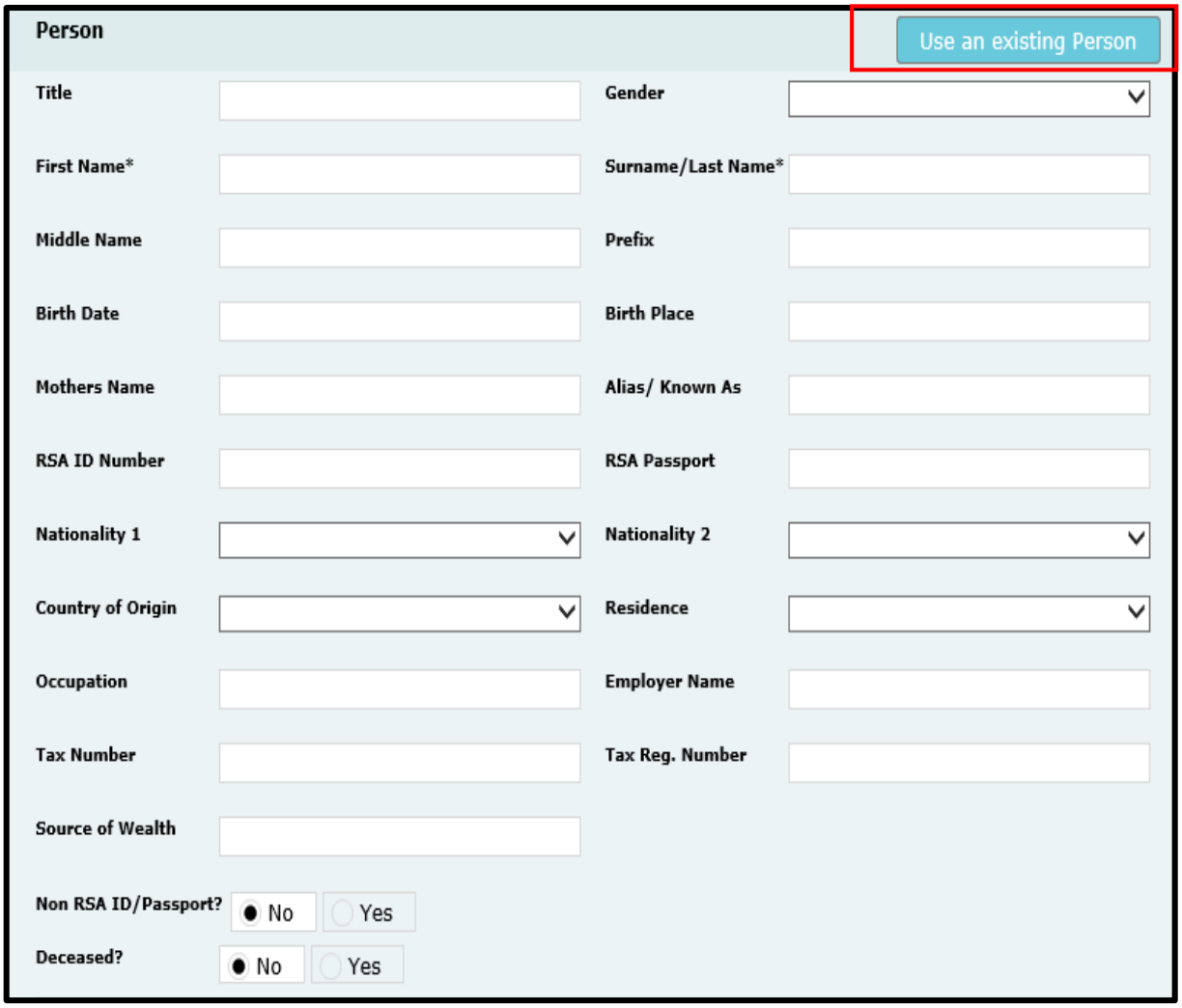
5.10 Party Type

The field party type in an activity report it is mandatory; the reporter must indicate whether the party type is a person, account or entity, as the report does not have a **From** (payee) and **To** (receiver) side like a transactional report. Party Type has three radio button **Person** / **Account** / **Entity** that are discussed next:

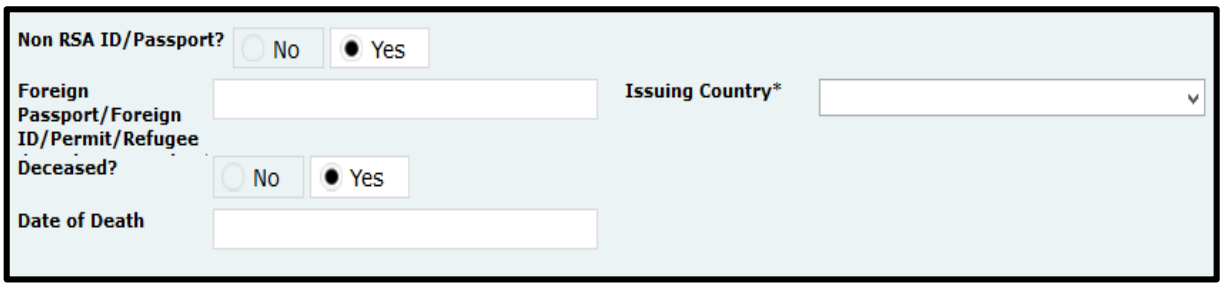
5.11 Person Form

- Click the **Person** radio button > The Person add button displays > Click the Add button > the Person add button, to generate the **Person** form

The below screen will generate once the conductor has been selected. "**Use an existing Person**" button is used to populate Person information that was already captured on the web session on goAML.

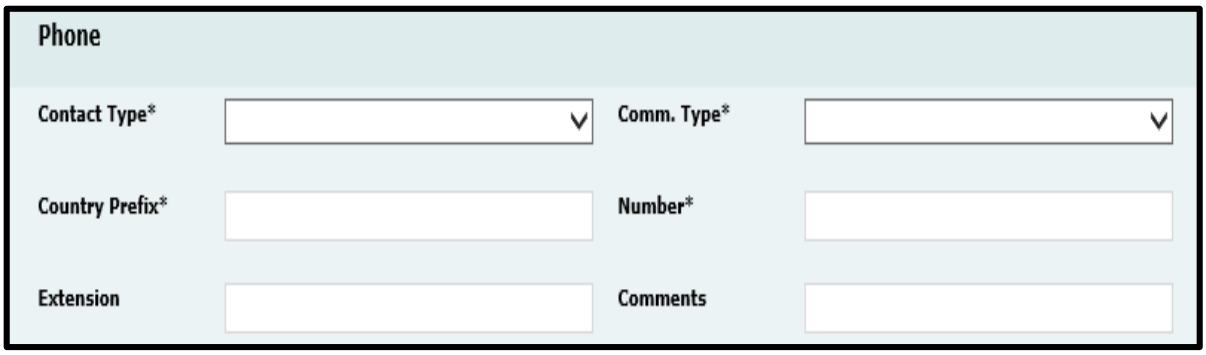


- Clicking the Yes radio button populates additional fields to be completed



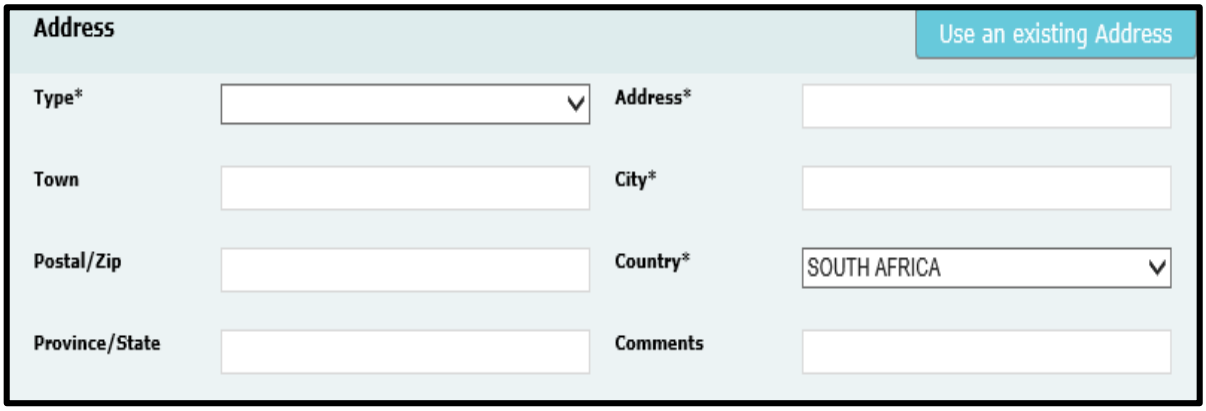
- Title – e.g. Ms / Dr / Mrs
- First Name – First name of the person
- Middle Name – Middle name of the person
- Birth Date –Date of birth/ can be typed in / from calendar in ccyy/mm/dd format
- Mothers Name – Maiden Name
- RSA ID No –13 digit South African ID Number This is a mandatory field in the event that it is my client and said client has a SA ID Number (e.g. 7404080408069)
- Nationality 1 – The status of belonging to a particular nation, whether by birth or naturalisation
- Country of Origin – The country in which a person is deemed to have originated
- Occupation – Job title of the person
- Gender – Male / Female
- Surname / Last Name – Surname of the reported person
- Prefix – Any name prefix (e.g. titles of nobility - Duke)
- Birth Place – Place of birth
- Alias / Known As – Also known as name or other aliases
- RSA Passport – South African passport number
- Nationality 2 – The status of belonging to a particular nation, whether by birth or naturalisation
- Residence – Select the current residence country of the person
- Employer Name – Record of Employer details
- Tax Number – The tax number of the individual whose details are being captured
- Tax Reg. Number – The person's tax registration number issued by tax authorities
- Source of Wealth – The source of wealth / income of the individual whose details are being captured
- Non RSA ID / Passport? – No / Yes
- Foreign Passport / Foreign ID / Permit / Refugee / Residence Number – If reported person is not a South African citizen/resident (thus no SA ID Number and/or SA Passport Number) and thus the Non South African Number/Document field is "Yes", the completion of a Passport / Foreign ID / Permit/Refugee / Residence number is mandatory"
- Issuing Country – The country which issued the respective Foreign Passport / Foreign ID / Permit / Refugee / Residence Number
- Deceased – No / Yes, if the person has passed away
- Date of Death – If the person has passed away, then the date of passing is required in ccyy/mm/dd format

5.12 Phone



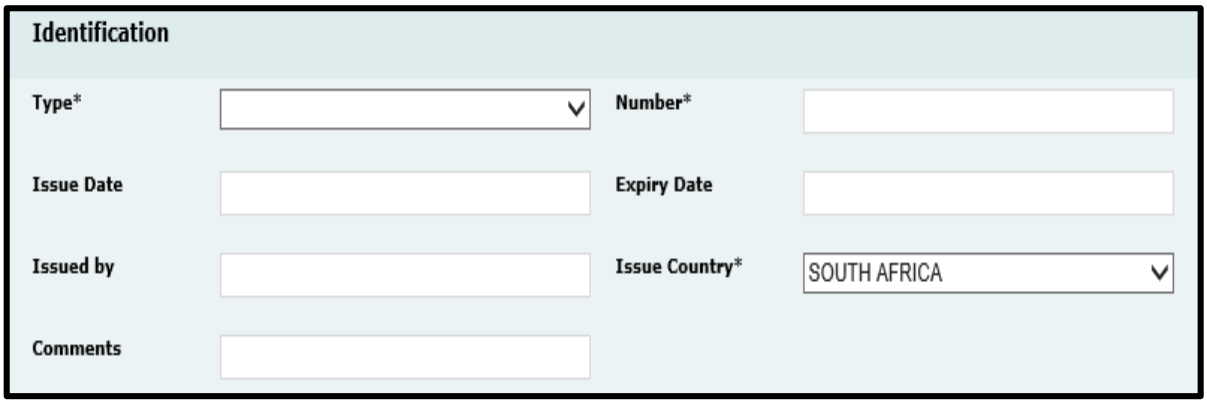
- Contact Type - It can be Business, Operational, Private, Public, Unknown
- Country Prefix - e.g. 27
- Extension - Numeric
- Comm. Type - It can be Landline, Mobile, Satellite
- Number - Numeric, digits (e.g. 0128012556)
- Comments - if any

5.13 Address



- Type - It can be Business, Operational, Private, Public, Unknown
- Town - Name of Town / district as part of a city
- Postal / Zip - the postal code of the city (e.g. 0122)
- Province / State - name of the province (e.g. Gauteng)
- Address - Physical Address - details like street name, house number etc.
- City - Name of the city
- Country - name of the country
- Comments - if any

5.14 Identification



- Type – It can be Travel Document / Permit / Passport etc.
- Issue Date – Identification document issue date
- Issued by - Name of authority that issued the document (e.g. Department of Home Affairs)
- Comments – If any
- Number - alphanumeric value of the ID document (e.g. AT08154711 or 8104226008085)
- Expiry Date - The last date of validity of the Identification document
- Issue Country - Country where the document was issued

5.15 Email

- Email – person's email address

5.16 Employer Address and Employer Phone

Clicking the **Employer Address / Phone** add button generates person's employers form to be completed

Save and Cancel Button

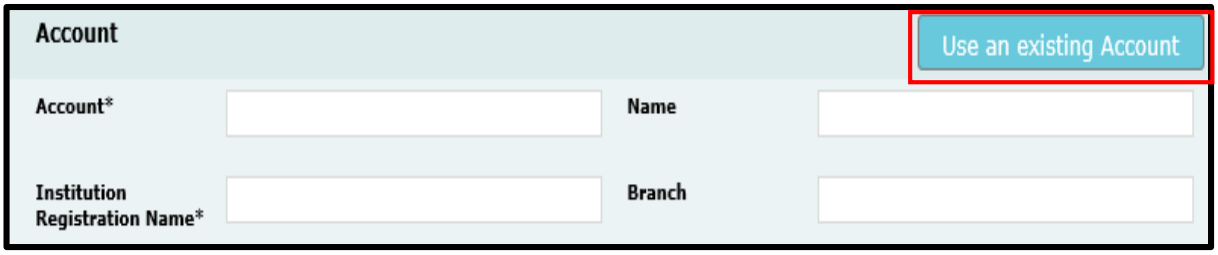
- Save – The save button adds information to the person's form
- Cancel – To cancel or discard the current screen information

5.17 Account

Clicking the Account **radio button generates** Account **field > click the** Add **button to generate the form**

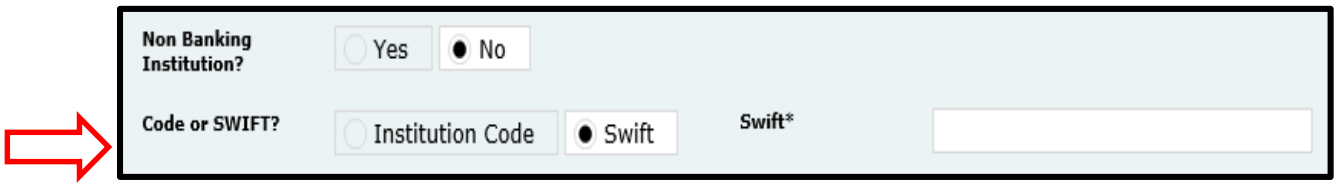
- Whenever the involved **Account** / **Person** / **Entity** is the client of the reporting entity, more details may be demanded on the client, and the reporting entity must have the information as part of the adherence to the "Know Your Customer" (KYC) requirements of the FIC Act.
- In the instance of an account of a minor both the details of the minor and guardian authorised to transact on his/her behalf should be captured.

The "**Use an existing Account**" button is used to populate Account information that was already captured on the web session on goAML



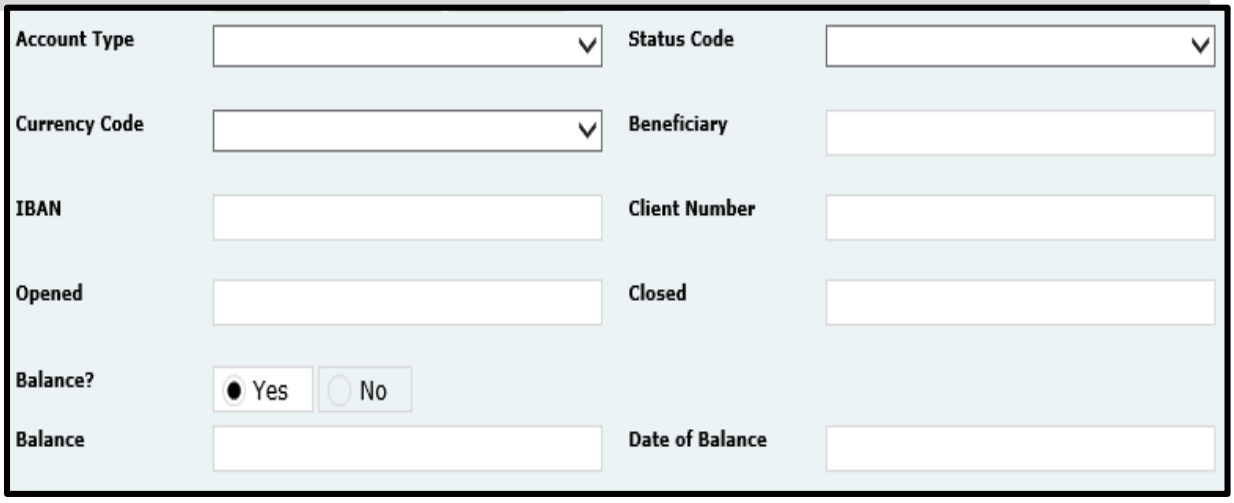
- Account – Account number (for **Non-Banking** institution the account number can refer to the client number/profile number assigned by the institution)
- Institution Registration Name - Name of the institution where account is held
- Name - The type of account that is being referred to (e.g. Trust account, savings account or client account etc.)
- Branch – Branch where the account is held

- Non Banking Institution? – Yes (if institution is **not** a bank) / No (If institution is a bank)
- Code or SWIFT? – Choose Institution Code
- Institution Code - Institution code is the code issued to Reporting Entity by FIC



- Non Banking Institution? – Yes (if institution is **not** a bank) / No (If institution is a bank)
- Code or SWIFT? – Choose SWIFT Code
- SWIFT – SWIFT code according to ISO 9362 (e.g. XYZ001)

Please Note: When a branch / business unit / franchise is reporting an account which belongs to a group / head office or other registered reporting entity on goAML- the relevant goAML Org ID of said group/head office / reporting entity must be listed to ensure that bucket / ledger / suspense accounts are reported properly



- Account Type - Type of account (e.g. Trust or Client)
- Currency Code - Currency the account is kept in
- IBAN (International Bank Account Number) - is a number attached to all accounts, the code identifies the country the account belongs to, the account holder's bank and the account number
- Opened – Date account opened in ccyy/mm/dd format
- Balance - The account balance at the time of reporting
- Status Code - Account status when transaction was initiated (e.g. Active / Closed)
- Beneficiary - Ultimate beneficiary of the account (Should be completed where the beneficiary is different from signatory)
- Client Number - Client number
- Closed - Date account closed
- Date of Balance – The date of account balance

Clicking the **Entity** add button generates the **Entity** form, the form is used to complete the details of the business entity owning the account, for **Entity** form refer to **5.18**

Clicking the **Signatory (ies)** add button generates the **Signatory (ies)** form, the form is used to complete the details of the Person(s) with access to the account

- Is Primary – Identifies the primary account holder. Only one signatory may be marked as is primary
- Role - The role of the signatory (e.g. Beneficiary, Account Holder)
- Person - clicking the person add button populates for person form, for **Person** form refer to **5.11**

Please Note: In instances where an account has multiple signatories all of the signatory details need to be captured.

- Beneficiary Comments – Any special remark on the beneficiary
- Comments - If any

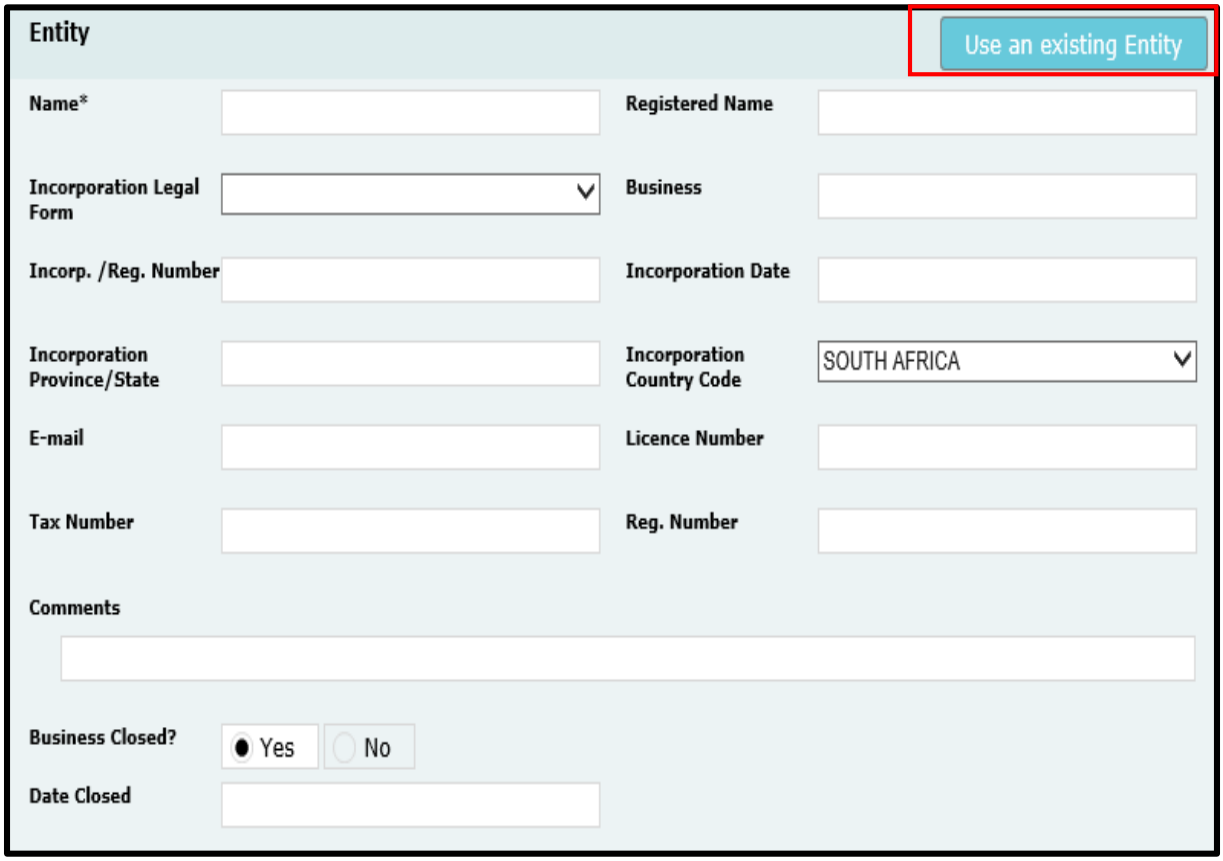
Save and Cancel Button

- Save – The save button adds information to the account form
- Cancel – To cancel or discard the current screen information

5.18 Entity

Clicking the **Entity** radio button generates **Entity** > click the add button to generate the **Entity** form

The "**Use an existing Entity**" button is used to populate Entity information that was already captured on the web session on goAML



- Name – Name of the entity
- Incorporation Legal Form - The legal form of the entity
- Incorporation Number - The registration number of the entity / company in the relevant authority (e.g. Chamber of Commerce/ CIPC etc.)
- Registered Name– The trading name of the entity
- Business - Business area of the entity.
- Incorporation Date - Incorporation registration date in ccyy/mm/dd format
- Incorporation Country Code - Incorporation registration country code, select from a list

- Incorporation State / Province - Name of the province
- E-mail - Entity email address
- Tax Number – The entity tax number
- Comments – If any
- Business Closed? – Yes / No
- Date Closed – If entity is closed, specify the date of closure in ccyy/mm/dd format
- Licence Number - License Number issued by the applicable supervisory body as per schedule 2 of the FIC Act
- Reg. Number - Registration Number provided to the tax authority and also extend to include relevant licensing or supervisory registration / trading number provided to the institution

Clicking the **Phones** add button generates the phones form, for **Phone** form refer to **5.12 Phone**

Clicking the **Address** add button generates the address form, for **Address** form refer to **5.13 Address**

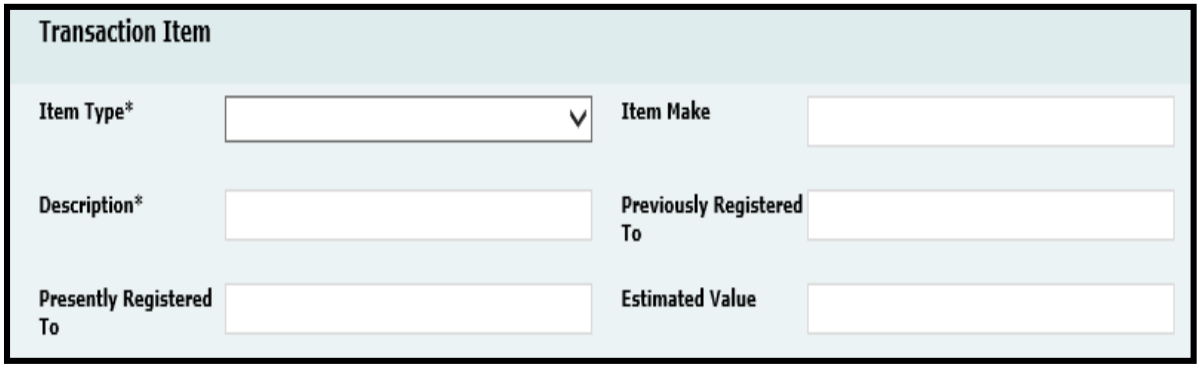
Clicking the **Director(s)** add button generates the Person (s) form, complete the details of the individual authorised as directories, for **Person** form refer to **5.11 Person**

BASELINE SCENARIO FIELD G – GOODS AND SERVICES

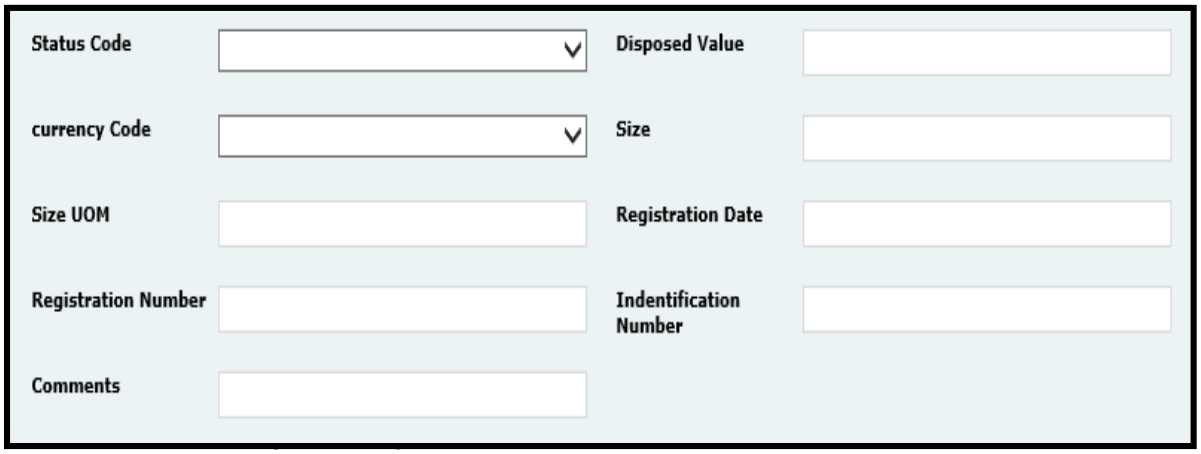
5.19 Goods and Services

Clicking the Goods and Services Add **button generates** Transaction **form**

- The **Transaction** form is used to capture the transaction item details



- Item Type – The type of item (e.g. Vehicle)
- Description – Description of the item (e.g. Luxury Car)
- Presently Registered To - Name of current owner
- Item Make – Item maker (e.g. if the item is a car - BMW)
- Previously Registered To - Name of previous owner
- Estimated Value - Estimated value of the item



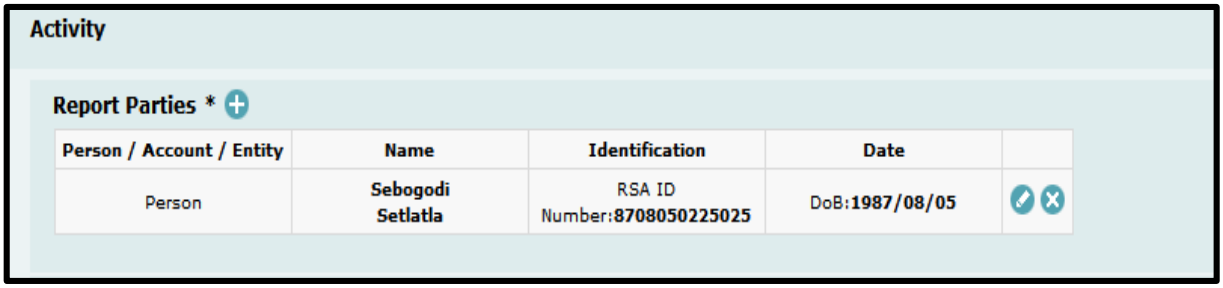
- Size UOM – Unit of measurement (e.g. square meters)
- Registration Number – Official registration number (e.g. Car VIN Number)
- Comments – If Any
- Registration Date - Official registration date in ccyy/mm/dd format
- Identification Number - Any number that can identify the item (e.g. Car Plate Number)

Clicking the Address add button generates the address form, for Address form refer to **5.13 Address**

- Status Comments - If any

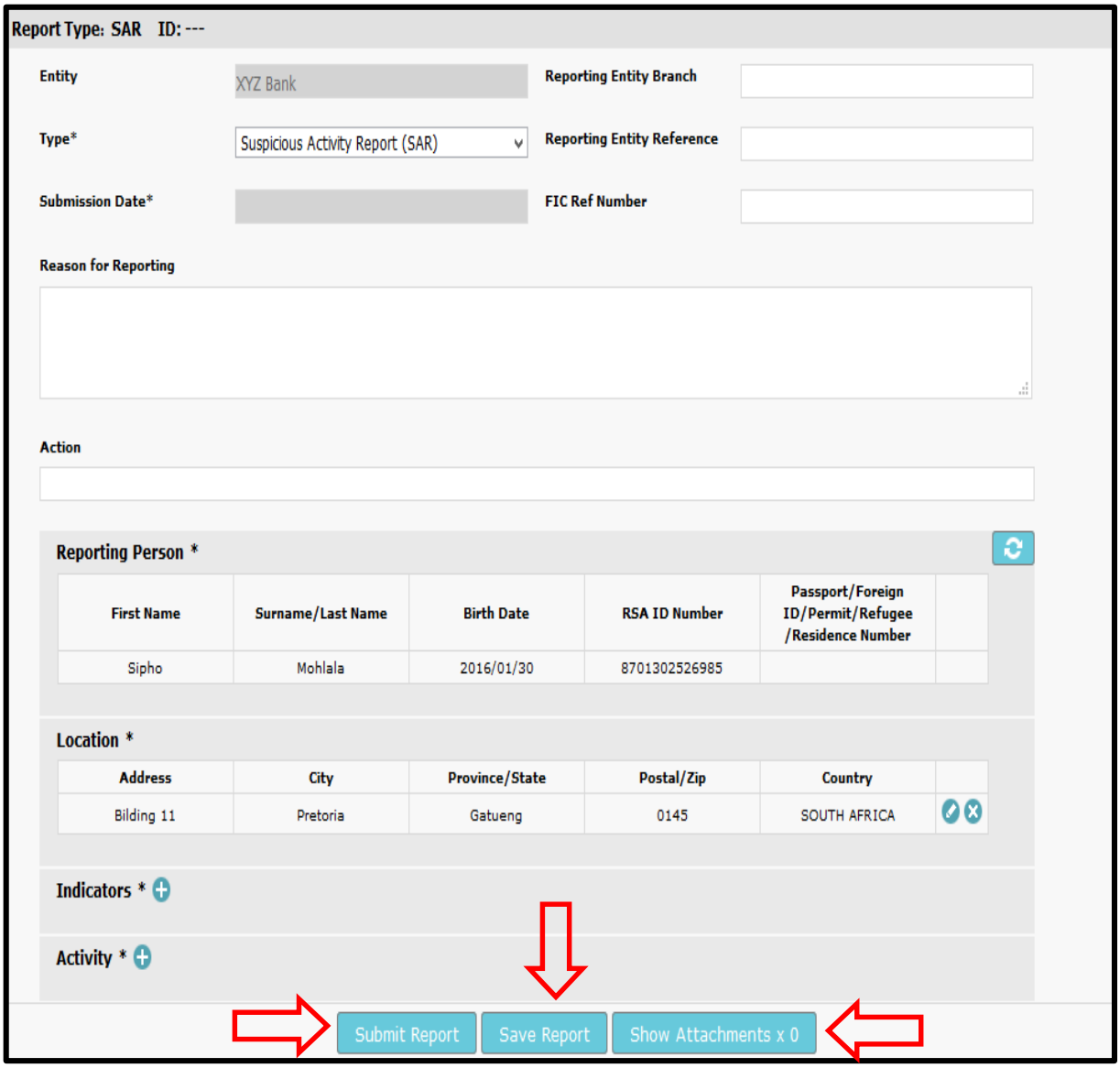
5.20 Adding Multiple Parties to Activity Report

goAML users are able to add multiple parties on a single activity report. To add **Multiple Report Parties**



- **C**lick the **Report Parties Add** button field (refer to **5.9**) > the **Report Party** form will populate > complete the details and Save. Captured report parties are editable by clicking the **Edit** button

5.21 Saving / Submitting the report



Submit Report - SAR reports can be submitted using the **Submit Report** Button.

Save Report - Save the SAR reports for editing later.

Show Attachments x 0 – documents can only be attached after saving the report, this button must be used to attach documents such as identification document (ID), proof of address, deposit slips, multimedia files and client information

Please Note: All activity information must be captured as structured information per report type and **no activity and/or** transactional information that should have been captured as structured data may be attached

--Ends—

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