goAML NOTICE 04

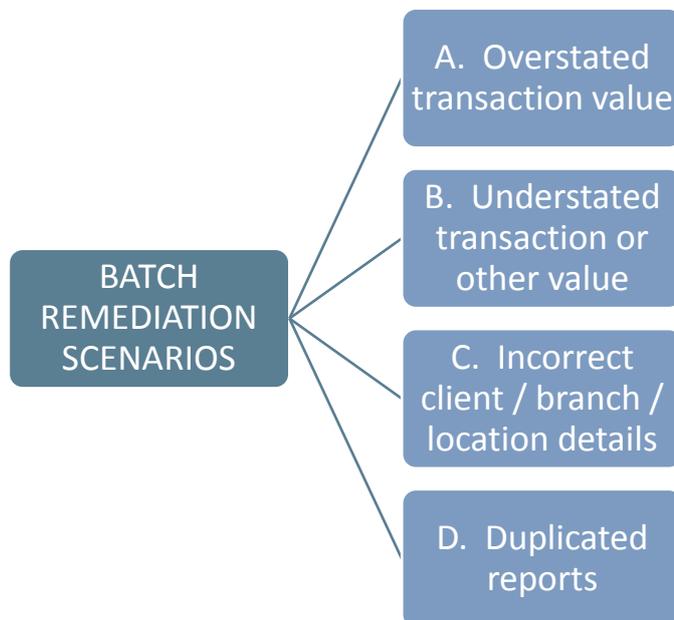**PROCESS TO REMEDIATE BATCH REPORTS ON THE FIC'S REGISTRATION AND REPORTING SYSTEM**

Wednesday, 14 December 2016: This notice applies to accountable institutions, reporting institutions and other businesses (reporting entities) who submit batch reports to the Financial Intelligence Centre (FIC) on its registration and reporting system, goAML. This notice explains the process to be applied by reporting entities when remediating or fixing failed and/or rejected batch reports on goAML.

Pre-Validation

1. In order to prevent failures and/or rejections, pre-validation of batch reports or XML files should be conducted before uploading of batch reports or XML files. This will ensure that accurate information is reported to the FIC within the prescribed format and time period.

2. Reporting entities should pre-validate their batches in-house and <u>may not</u> utilise goAML as a pre-validation tool. In addition reporting entities should remain mindful of adhering to the Money Laundering and Terrorist Financing Control Regulations (Regulations), the goAML schema and business rules.

Quality reviews and assurance processes

3. Reporting entities should follow a multi-disciplinary approach that will enable them to apply adequate quality control measures, and implement assurance processes in order to identify potential issues relating to submission of batch reports to the FIC. This will ensure that issues are identified and rectified timeously in accordance with the FIC defined processes, outlined below.

Process to remediate failed or rejected batch reports

4. This section explains the process to remediate different scenarios of failed or rejected batch reports.

A.   Reported with an overstated transaction value

This applies where a batch report was submitted in terms of section 28 of the FIC Act with an overstated value and the correct transaction value is below the prescribed threshold amount of R24 999.99. The reporting entity must correct the report by submitting a new report with the previously overstated transaction amount and in the **"Comments"** field of the report, the reporting entity must state the correct transaction amount, and describe the reason for the correction being made.

B.   Batch report reported with an understated transaction or other value

This applies where any batch report was submitted with an understated transaction or other value. The reporting entity must correct the report by submitting a new report with the correct transaction or other value and in the **"Comments"** field of the report, the reporting entity must describe the reason for the correction being made. Where a series of transactions are being reported such transactions should be aggregated when applicable, and captured separately.

C.   Batch report submitted with incorrect client/branch/location details

This applies where any batch report was submitted with incorrect client and/or branch and/or location details. In this instance, the reporting entity must correct the report by submitting a new report with the correct client and/or branch and/or location information and in the "Comments" field the reporting entity must describe the reason for the correction being made. Where a series of transactions are being reported such transactions should be aggregated when applicable, and captured separately.

D.   Duplicated reports

This applies where a duplicated batch report was submitted to the FIC. The reporting entity must send formal correspondence to the FIC detailing the reference numbers of the duplicated reports, the transaction dates and values, as well as the reason for the duplication. The FIC will revert to the reporting entity with a resolution on the matter.

Process overview

5.   When remediating reports for all types of batch remediation scenarios (explained above), the reporting entity must specify the previous report number (which is the **"Report ID"** of goAML submitted reports) in the **"fiu_reference_number"** field and include relevant descriptions in the **"Comments"** field which describes the reason for remediation and the action taken.

6.   The reporting entity must formally confirm when the remediation process has been completed, and provide the FIC with the goAML Report ID, report type, the reporter entity's internal reference number, client information (client name and unique discriminator), transaction date and amount is listed. Note that each transaction must be listed individually and may not be grouped or consolidated with others.

7.   Each reporting entity should consult the Regulations together with the goAML schema and business rules to ensure its batch submissions adhere to the prescribed format and are submitted accordingly.

For any further queries on this process, do not hesitate to contact the FIC, as follows:

- By using the Compliance Queries link on the FIC website, http://www.fic.gov.za
- Call the FIC Compliance Contact Centre on 0860 222 200.

Issued by:
The Financial Intelligence Centre
14 December 2016