

goAML NOTICE 04A

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

Tuesday, 10 November 2020: This notice applies to accountable institutions, reporting institutions and other businesses (reporting entities) who submit web and 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 reports on goAML. This notice also explains the process to be applied by reporting entities when they discover that the report they submitted to the FIC and was accepted by the FIC system contains incorrect/inaccurate information. This notice replaces goAML Notice 4 which was previously issued by the FIC.

Pre-Validation

1. Reports submitted to the FIC on goAML cannot be changed after being submitted. The reporter must check the report before submitting it to the FIC to ensure that all the information captured in the report is correct and accurate.
2. Reporters should ensure that the reports they submit to the FIC adhere to the Money Laundering and Terrorist Financing Control Regulations (Regulations), the goAML schema and business rules.
3. 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.
4. Reporting entities should pre-validate their batches in-house and may not utilise goAML as a pre-validation tool.

5. The FIC has a testing environment (Staging UAT environment) which can be used by reporters to test their reports before they start submitting reports on the FIC's Production environment.

Quality reviews and assurance processes

6. 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 reports to the FIC. This will ensure that issues are identified and rectified timeously in accordance with the FIC defined processes.
7. Reporting entities should also conduct post submission quality reviews on an ongoing basis to ensure that their submitted reports have indeed been processed/accepted, and the client information and transactional data reported meets the requirements outlined in the regulations, and (correlates with the information held by the entity).

Process to remediate rejected reports on goAML

8. All the reports submitted to the FIC through the goAML system must adhere to the Money Laundering and Terrorist Financing Control Regulations (Regulations), the goAML schema and business rules. If the report does not meet these requirements, it might be rejected by the FIC system (goAML). If a report is rejected by goAML then the reporter has an obligation to remediate that report. There is no additional period given to reporters for remediation. A report is only considered reported to FIC once it is successfully processed by the FIC system and contains correct and accurate information.
9. Once a report is submitted on goAML, the reporter will receive a notification through the message board whether that report was successful or rejected. If the report is rejected, the reporter has an obligation to remediate it.

Process to remediate rejected reports submitted on goAML web

10. If the rejected report was submitted as a web report the reporter must follow these steps to remediate:
 - Login to goAML

- Access the rejected report through the Submitted Reports menu on goAML
 - Select **revert** on the report, which will move the report to the Drafted Reports menu on goAML.
 - The reporter must then access the report on the Drafted Reports menu and then **edit and correct** the relevant information as per the reasons and specifications provided by the FIC through the message board and **re-submit** the report to the FIC.
11. If a web report is rejected, the reporter must remediate that rejected report and not submit a new report as this will create a duplicate on the FIC system.

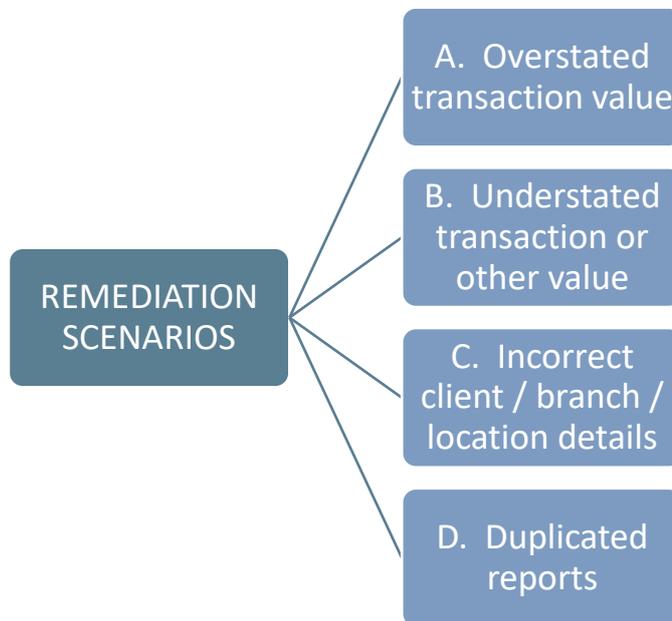
Process to remediate rejected batch reports

12. If the rejected report was submitted as a batch report, the reporter must follow these steps to remediate:
- The reporter must correct the relevant information in the XML file they originally submitted as per the reasons and specifications provided by the FIC through the message board.
 - The reporter must ensure that they list the “**Report ID**” allocated to the rejected/failed batch report in the “**fiu_ref_number/FIC Ref Number**” field.
 - The reporter must also ensure that they complete the “**comments**” field per transaction to describe the reason for remediation and the action taken
 - The reporter must then **re-submit the report as a new report** to the Centre.

Process to remediate successfully processed reports with incorrect information

13. The FIC considers a report to be successfully received by the FIC, if it is accepted by the FIC system, adheres to the Money Laundering and Terrorist Financing Control Regulations (Regulations), the goAML schema and business rules and it contains correct and accurate information.
14. It is very important that before a reporter submits any report to FIC to check it for correctness and accuracy.
15. Sometimes after a reporter submits a report and it is successfully processed by the FIC system, the reporter might find that the information reported is not correct or accurate.

16. This section explains the process to remediate different scenarios of reports successfully submitted and processed by the FIC system but contain incorrect or inaccurate information.



A. Report submitted with an overstated transaction value

This applies where a report was submitted with an overstated value. The reporting entity must correct the report by submitting a new report with the correct transaction amount and in the “**Comments**” field of the report, the reporting entity must state the previously overstated transaction amount and describe the reason for the correction being made. If the correct transaction amount is less than the threshold amount, and the report was not supposed to be reported, then the reporting entity must send formal correspondence to the FIC detailing the reference numbers of the report, the transaction date and value, as well as the reason for the correction.

B. Report submitted with an understated transaction or other value

This applies where a 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. Report submitted with incorrect client/branch/location details

This applies where any 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 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.

Process to remediate the reports submitted with incorrect/inaccurate information

17. When remediating reports for all types of 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.
18. 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.
19. Each reporting entity should consult the Regulations together with the goAML schema and business rules to ensure its 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 012 641 6000 option 1

Issued by:
The Financial Intelligence Centre
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