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# GUIDANCE NOTE 2 OF 2015 SANCTION SCREENING TOOL

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## **1. INTRODUCTION**

This Guidance Note is intended for Accountable Institutions (AI's) and Reporting Institutions (RI's) on schedule 1 and 3 of the Financial Intelligence Act ,2012 (Act No. 13 of 2012) (the Act) as amended, which do not have a screening tool, to screen the transactions against the designated UN sanctions lists and other lists as maybe proscribed domestically by the Security Commission in term section 44 of the Prevention and Combatting of Terrorist and Proliferation Activities Act, (Act No. 4 of 2014).

### **1.1 GENERAL**

The Financial Intelligence Centre (FIC) during its Anti-Money Laundering, Combatting of Terrorism Financing and Combatting of Financing of Proliferation (AML/CTF/CFP) assessments on Accountable and Reporting Institutions realised that the screening procedures were deficient due to a lack of screening systems or tools to screen:

- a) designated persons or organisations;
- b) persons or organisation controlled or owned (directly or indirectly) by a person or organisation mentioned in paragraph (a);
- c) persons or organisation controlled or owned directly or indirectly by a designated country;
- d) persons or organisations acting on behalf of (or at the direction of) a person or organisation mentioned in paragraph (a), or
- e) persons or organisations acting on behalf of (at the direction of) a designated country.

It was further observed that most AI and RI's cannot afford to purchase screening tools. Due to the fact that the FIC issues PDF versions of the designated sanctions lists, there has been a challenge to monitor clients against the sanction lists as it is impractical to do it manually without a screening tool. Due to this challenge, the FIC developed a screening tool which will assist the AI and RI to do the monitoring in an effective and efficient manner.

### **1.2 COMMENCEMENT**

This guidance note shall come into effect on 08 October 2015

### 1.3 DEFINITION OF TERMS

“**Accountable Institutions**” means a person or entity listed in Schedule 1 of the Act;

“**Act**” refers to the Financial Intelligence Act, 2012(Act No. 13 of 2012);

“**FIC**” means the Financial Intelligence Centre

“**PACOTPAA**” Prevention and Combatting of Terrorist and Proliferation Activities Act, (Act No. 4 of 2014)

“**Reporting Institutions**” means a person or entity listed in Schedule 3 of the Act;

“**UN Sanctions List**” means a list issued and maintained by or under the authority of the United Nations Security Council (under Chapter VII of the UN Charter) comprising of persons, groups, undertakings, entities or countries subject to United Nations sanctions, which requires various enforcement measures to be taken by UN member countries.

### 1.4 APPLICATION

The FIC has prepared this Guidance Note to assist the AI’s and RI’s which do not have a screening tool to meet their obligations as described in sections 23 of FIA and section 25 of Prevention and Combatting of Terrorist and Proliferation Activities Act, 2014 (Act No. 4 of 2014), (PACOTPAA). The Guidance Note provides guidance on how to use the screening tool that was developed by the FIC.

## 2. ACCESSING THE UN SANCTIONS LIST SCREENING TOOL:

The UN Sanctions List Screening Tool is located on the secure goAML Web Portal.

In order for an AI/RI to gain access to the goAML Web Portal such AI/RI should be registered with the FIC.

Once registered, you will be provided with a user name and a password.

The **same user name** is used to also access the Sanctions List Screening Tool on the goAML Web Portal.

### 2.1 HOW TO ACCESS THE goAML WEB PORTAL

- Log onto [www.fic.na](http://www.fic.na) - Click [FIC Reporting Portal - PRODUCTION](#)
- Log in to the goAML Web Portal using your logon credentials provided by the FIC.
- Once logged in, click on the UN Sanctions List Screening Tool Link.

- If you have difficulty logging in, please send a message to the [helpdesk@fic.na](mailto:helpdesk@fic.na)

## 2.2 HOW TO USE THE UN SANCTIONS LIST SCREENING TOOL

- The UN Sanctions List Search screen will be displayed
- Log in to the Tool with the same user name that you use to log in to the goAML Web Portal
- You only need to provide a user name to log in.

- The Search screen is displayed.

- The following search options are available:
  - ❖ **Type** – By clicking on type, you can search for an individual or an entity
  - ❖ **Name** – This is a **mandatory** field and must be entered. You may use the full name (name and surname), or part of the name or just the surname to search. To search for an entity you may use the entity’s full name or part of the entity’s name.
  - ❖ It is recommended that when no matches are obtained when searching on full individual name or entity name that you only type in part of the name to check for possible matches.
  - ❖ Address
  - ❖ ID Number
  - ❖ City
  - ❖ Country
- A combination of search criteria can also be used, i.e. Name and ID Number or Name and Address etc. Which may ensure more accurate search results
- Minimum Name Score – Enter a minimum name score between 50 and 100.
- ❖ The minimum name score functionality is used to limit the search results according to the similarity between the entered name and search results name. For example if you would like to see only search results that contain

name matches close to 90%, you would adjust the minimum name score to be 90%.

- ❖ **How do I use the Minimum Name Score field and score slider bar?** The minimum name score field limits the number of names returned by the search. A value of 100 will return only names that exactly match the characters entered into the name field. A value of 50 will return all names that are deemed to be 50% similar based upon the matching logic of the search tool. By lowering the match threshold the system will return a broader result set.

## 2.3 SEARCH RESULTS

- Once the search results are displayed, click on the selected record to obtain more information

The screenshot displays a search interface. At the top, a box titled "Search options entered" shows search details: "Search performed on : 30/04/2015 14:52:43", "Type: Individual", "Address: dumont", "City: dumont", "Country: ", and "Minimum Name Score: 50". Below this is the "Search Results" section, which includes a link "Export current search results view to PDF" highlighted with a red box and a red arrow. Underneath, it states "1 individual found" and "Display 10 records". A search input field is present. The main results are shown in a table with columns: ID, Name, Address, Type, and Score. The table contains one entry: ID "QDi.095", Name "LIONEL DUMONT", Address "France", Type "Individual", and Score "50". A red arrow points to the "Name" column header. At the bottom, it says "Showing 1 to 1 of 1 entries" with a pagination control showing "1".

## 2.4 EXPORTING SEARCH RESULTS

- The search results can be exported by clicking on the link *“Export Current Search results to PDF”*.
- Once exported to PDF, the results can also be printed.
- To clear the current search results click on the search button on the left panel of the screen



## 2.5 REPORTING THE RESULTS TO THE FIC

Once there is positive match (only when most of the information is matching to the list), the Accountable or Reporting Institution must conduct enhanced due diligence (obtain more information) on its client or prospective client. This is to enable the AI/RI to effectively use all the search options i.e. Name (name and surname), ID number, City Address, City and Country) to be able to determine whether the search result is a perfect match to the name on the sanctions list. Once this exercise has been conducted and there is a perfect match (all the search options are used and the client is a perfect match to the name on the list) or if the AI/RI has reasonable grounds to believe that their client is matching to that on the sanctions list, then the AI/RI should file a Suspicious Transaction Report (STR) to the Centre, and take the following actions:

- stop all business dealings with such client,
- where applicable, not make any funds, bulk cash, economic resources or any other assets or financial or related services (directly or indirectly) wholly or jointly available to, or on behalf of, or for the benefit of such clients, and
- inform the FIC within 24 hours of all actions taken in respect of such clients.

If the AI/RI conducts enhanced due diligence and the client is still a half positive match, this is not reportable to the FIC.

### FURTHER INFORMATION

Enquiries can be directed to the FIC Help Desk by:

Email to [helpdesk@fic.na](mailto:helpdesk@fic.na)

Tel: + 264 - 61-2835100

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The guidance provided by the Centre in this guidance note, even though authoritative, is not intended to replace the FIA or PACOTPAA including Regulations issued thereunder.

The information contained herein is current as at the date of this document.

Date issued: **08 October 2015**

**Director: Financial Intelligence Centre**