

# goAML

## TRAINING EVENT REPORT

19<sup>th</sup>, 20<sup>th</sup> & 24<sup>th</sup>, 25<sup>th</sup> November 2020

Ivys Hotel



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## TRAINING EVENT REPORT

### Introduction

The training session was organized and coordinated by the Financial Intelligence Authority (FIA), a regulatory body established by an Act of Parliament to monitor and investigate cases of money laundering and terrorist financing in Uganda. FIA is looking to upgrade the mode of communication between itself and the Accountable Persons victim to these cases by transcending from a system where emails and physical reports are tendered to the use of a web-based program termed as goAML (Go Anti Money Laundering System). The training was carried out in form of a two-day workshop designed to teach and train representatives of various institutions on registration and use on the application of goAML.

### Purpose of the training

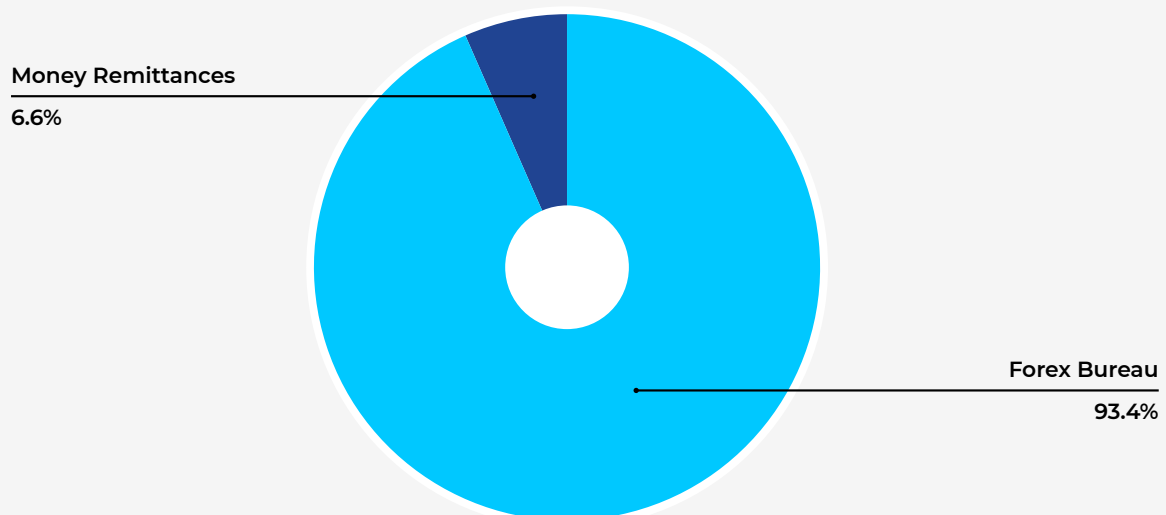
To train different forex bureaus on the registration, use and application of the goAML web-based program as a platform of communication when reporting to the FIA cases of money laundering and terrorist financing in their respective institutions.

Overall, the training was organized for 80 forex bureaus, with the first batch of 40 participants attending on the 19<sup>th</sup> & 20<sup>th</sup> November 2020 and the second batch of 40 participants attending on the 24<sup>th</sup> & 25<sup>th</sup> November 2020.

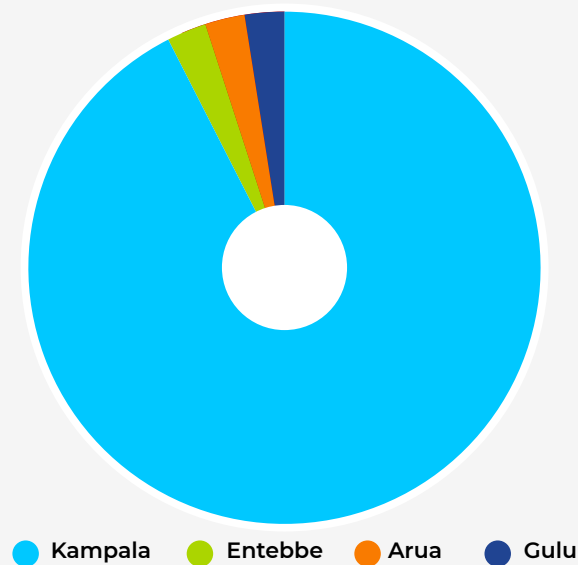
### Details about the participants

Majority of the participants who took part in the training were from Forex Bureaus

Composition of participants



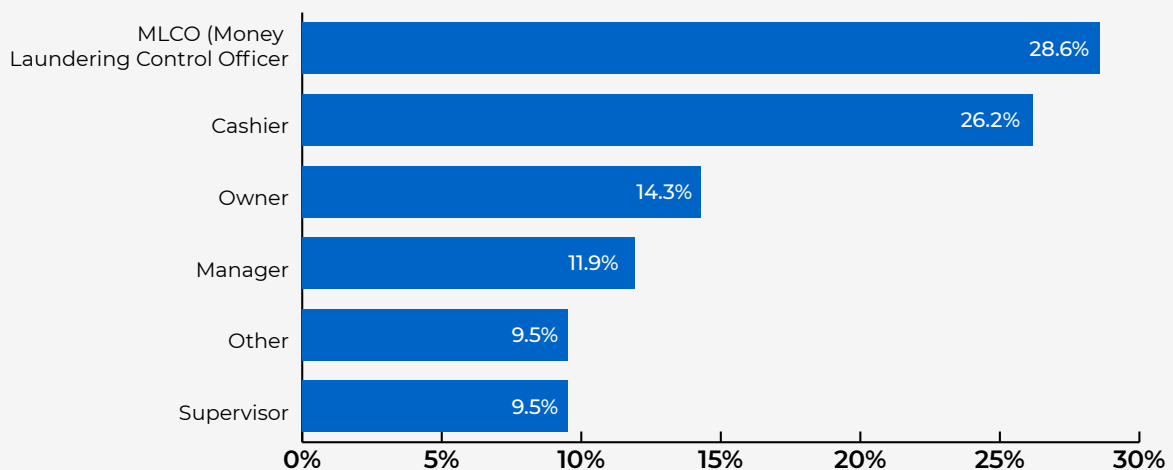
Participants' areas of operation



around Kampala. There were also a few participants from money remittances and those who were from areas outside of Kampala city.

Most of the participants identified themselves to be the Money Laundering Control

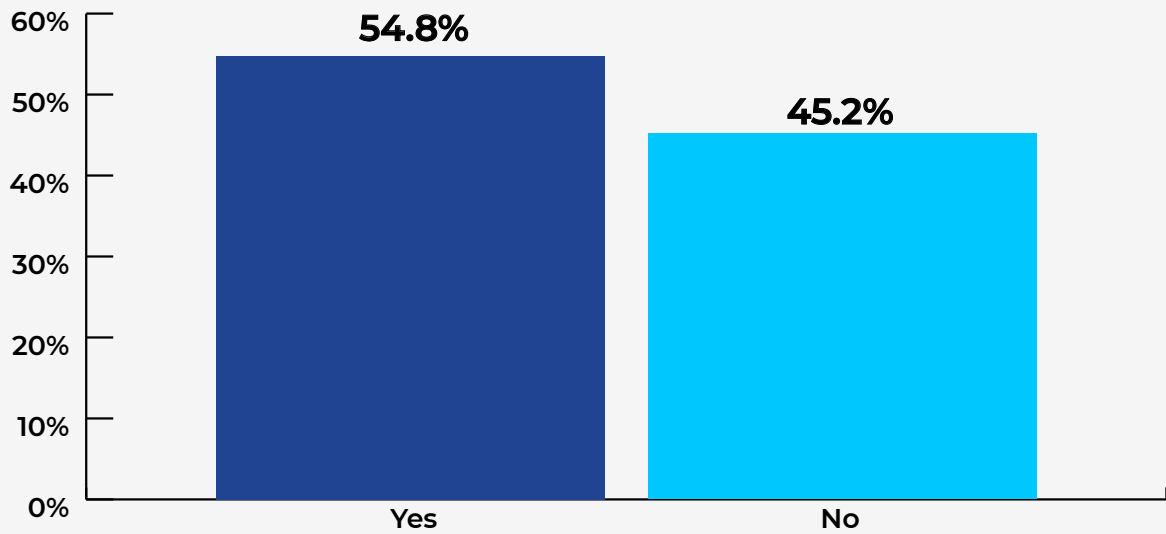
Participants' roles in their organizations



Officers in their organizations, with the second largest group identifying themselves as the cashiers or owners of the establishments. Other groups present were managers, supervisors, trainees and compliance officers.

## How different participants monitored money

Participants who have tools for detecting ML



## laundering before the training

- Manual monitoring of transactions
- Identity mind
- Detective machine
- Large cash reports to Bank of Uganda
- Money detector or UV Light
- Through use of ML and TF operational manual
- Customer due diligence
- Trainings
- Compliance department
- UN checklist and personal judgment
- Websites and training

## PROCEEDINGS

### 1. Welcome remarks from the project manager

*Presenter - Ms. Sherifah Tumusiime*

The presenter spoke about the importance of the training and the need for this training to be incorporated within financial institutions underlining why the training was especially important to employees of forex bureaus. She also mentioned that if the training was not sufficient then handbooks were to be provided in order to make the training effective.

She introduced the FIA as an authority established and mandated under the law to act as an investigative body to tackle money laundering and terrorist financing. She expressed how this could be achieved through communication from financial institutions in the form of reports informing the FIA of any suspicious transactions and activities. She noted that the current means of communication mostly composes of emails and physical reports delivered to the FIA but that the FIA is looking to phase these out in favor of an automated system, goAML. She concluded by assuring all attendees that they would be able to navigate and use the goAML system at the end of the workshop.

### 2. Opening Remarks from the Director System Administration and Security

*Presenter - Mr. Barigye Cyrus*

The presenter introduced himself, welcomed the trainees and, using a PowerPoint presentation, gave an overview on what is to be achieved and talked about during the workshop. He explained what FIA is, spoke extensively about the legality of FIA under statute and its role in tackling money laundering and terrorist financing, explaining how this is achieved on a trust basis and mandated responsibility (under law) for information on suspicious transactions and actions to be exchanged between FIA and financial institutions such as forex bureaus so that investigations are carried out in that respect. The presenter went on to explain that money laundering constitutes money obtained from illegitimate sources and is washed through legitimate businesses and financial institutions and why it was important to stop this practice. He showed that this vice affects security and stability within an economy, tarnishes a country's reputation, affects integrity of financial institutions and reduces tax revenue.

The discussion then went on to the stages of money laundering giving an acronym, PLI i.e. **Placement, Layering and Integration**. **Placement** being criminals coming through with large chunks of 'dirty money' to be exchanged for clean money, **layering** constituting the transfer of the same income into different financial



institutions in a bid for the money trail to be lost within the system and **integration** which constitutes putting the already said income into active units such as real estate. The presenter stated that the training would be putting emphasis on the Placement phase and why forex bureaus were targeted for this exercise since they are engaged in Money Value Transfer Systems and are targets for transfer of money for criminal organizations. He concluded by mentioning that the FIA is mandated to evaluate and investigate information from financial institutions with the generated Intelligence Reports being submitted to the respective Law Enforcement Agencies for further action when required.



## The goAML system

*Presenter - Mr. Ivan Bwire*

### 3. Introduction to goAML

The presenter explained that goAML, which stands for 'go Anti Money Laundering', is an integrated online software solution developed by the United Nations Office on Drugs and Crime (UNODC) and designed for use by Financial Intelligence Units such as FIA to collect, analyze and disseminate high volumes of reports on suspicious transactions or actions of warranted nature. He went on to state the importance attributed with this program like simpler data collection, rule based analysis, secure communications, escalate dissemination to law enforcement as FIA is only established to investigate and handover to law enforcement like police and rapid exchange of information while ensuring confidentiality.

The speaker went on to explain that as many financial institutions have their own detection systems, there is a need to integrate those systems with FIA's goAML to



make reporting easier and automated. The features incorporated within goAML were briefly explained such as it is a web based system that does not require new installation within an institution but rather access to the internet, registration for reporting entities, role management for user access rights, a message board which is an email like platform within goAML for communication, statistical reporting i.e. the ability to view statistical data on transactions such as submitted reports, how many were accepted, partially accepted or rejected, etc.

He then mentioned that there were deadlines to be met by all entities in regard to the implementation of goAML i.e. 11<sup>th</sup> January 2021 as registration timeline, February 2021 for the follow-up technical visits to the respective Forex Bureaus and by March 2021 to go live.

## 4. Registration on goAML

This part of the training was practical and the presenter asked all attendees to make use of the wifi provided by the hotel. He did warn people that the wifi had instances or points in time when it becomes slow so he advised those who had data on their mobile phones to use that for smooth practice runs. The requirements prior to registration into the goAML platform i.e. Certificate of Incorporation for the entity, letter from Executive authorizing system users and scanned National ID/ passport were discussed as these would be required during the registration process.

(There was a delay before the start of the registration exercise due to internet connectivity issues and, since some participants did not attend with their laptops, connecting to the platform via phones.)

### 4.1 Financial entity information

This initial part of the registration process required the input of the financial entity's information i.e. entity name, the acronym to the name, incorporation number, the commercial name to the entity, city, and country of establishment, name of holding company if the entity is part of a group of companies, the contact, email incorporated legal power which basically calls for the nature of business (i.e. sole proprietorship, partnership, company) so as to avail its legal capacity, website and the





contact person who is one who receives information and communicates with the FIA which could vary depending on the entity. It was noted that some responses are compulsory (those with a \* symbol) while others are not (those without a \* symbol) however, the trainees were encouraged to capture as much available information as possible.

Equally, there were additional forms to be filled in and these could only be accessed by clicking the plus (+) sign next to them. These include information on the forex phone, the type i.e. mobile or landline, country prefix and the actual contact number. At this point, one is required to save their information.

Parties were advised to provide as many genuine answers as they could to prove the authenticity of the transaction.

Questions at this stage related mainly to procedural issues to which the attending speaker was clear and guided the participants through the exercise to the next stage.

## **4.2 Registering a person**

This part of the registration focused on how users should attain the information of the person actually registering under the goAML platform. As such, the speaker called for all persons to use their personal information (for test purposes) but also advised that in the actual application within the institutions, the team members should discuss what information will be filled in and who the person conducting the input should be. The speaker furthermore advised that parties try as much as possible not to forget their usernames, emails and password in the registration process both in the test and later on the actual registration.

The registration forms required the input of a user name which FIA advised the use of a staff name or ID number, entered as one word (no spaces) for instance Moses.Muhanguzi or MM23. Further, an email address is required (a work email would be best), the registering person's first and last name, NIN number from one's national ID for nationals but also passport ID numbers would be sufficient for non-nationals.

The speaker called for the pre-registering requirements i.e. Certificate of Incorporation for the entity, letter from Executive authorizing system users and scanned National ID/passport (which in total should not exceed 20 mbs) should be uploaded and submitted. The presenter advised the attendees to submit their registrations forms and a confirmation would then be sent to the email addresses used in the registration process. He further added that logging to the system was Two Factor authentication based whereby a security code was emailed for the user to input for a successful login besides just the Username and Password.

There was a lot of time spent in this phase as the speaker was keen to ensure everyone was at the same level before moving to the next stages.

Once all attendees had logged into the system after registering, the presenter showed them the interface of the goAML web page and directed them to the menu bar. He also mentioned that the password can be changed but the user name cannot be changed.

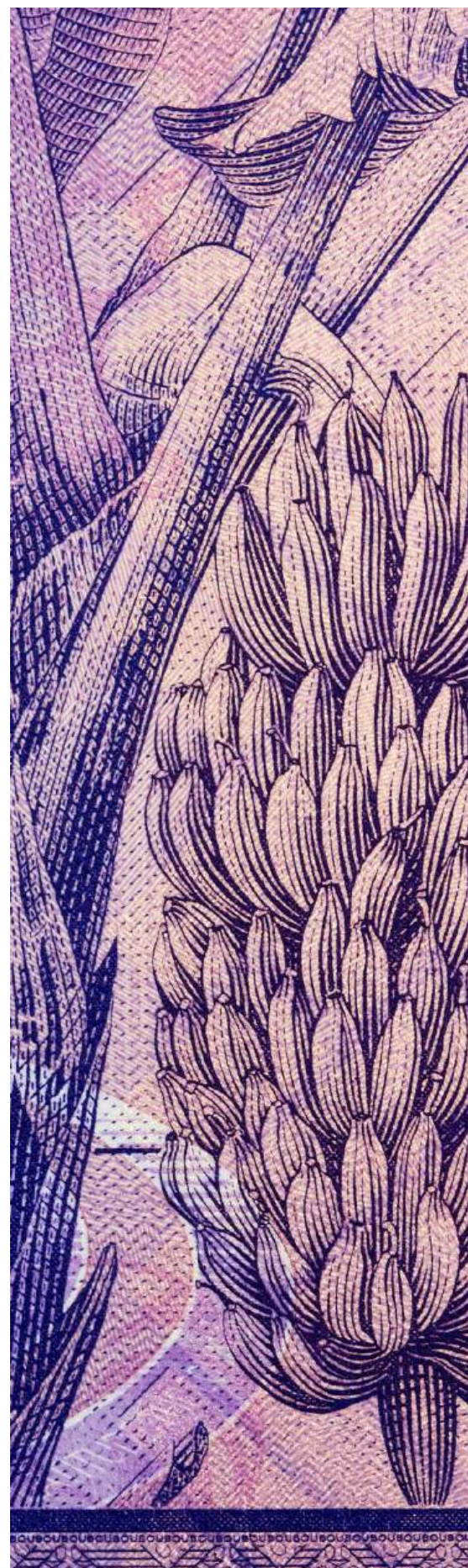
The presenter and a few associates from FIA constantly engaged with the participants, helping those who were stuck and ensuring that all people were at the same point before going on to the next stage.

## 5. User role management

This stage was to establish the roles and the various system pages that could be associated with the respective roles within the goAML platform. He explained that from here the parties will be able to see the rights reserved to every user as some would be having access to certain functions and information that others don't within goAML and this can be subject to change depending on what the administrator deems fit.

He explained that under the "Admin" user role management, all editing capabilities are allowed so respective persons were advised to create their roles within the system for example as cashiers, compliance manager, etc. much as there already existed a default user role.

The presenter explained that the system comes with 2 default user profiles i.e. an Admin user who is given access to all functions and can revise the functions available for other users and regular users who, by default, lack access to some functions. One could know the functions available as those ticked meant access granted. He stated that entities would have to discuss internally as to what functions would be available for each user. It was asked how many users can be created







within goAML and the presenter answered that the system doesn't limit the number of users but advised institutions to create users applicable to the operational systems within the Forex bureau.

## 6. Reactions

The speaker asked if there were any questions, reactions or comments thus far in the discussion to which all persons did not respond. The workshop then continued under the assumption that all people were satisfied and content with what information and procedures were relayed to them.

## 7. STRs / SARs Submissions on goAML

The speaker noted that an STR and SAR were Suspicious Transaction Report and Suspicious Activity Report respectively. An STR was said to be reports that show transactions that are unusual to the pattern of transactions that the customer showcases and an SAR was said to be any action or activity that a customer portrays that is contrary to what a financial institution would expect. The speaker went on to describe the scenarios under which STRs and SARs be warranted asking attendees to describe some based on their experience.

### 7.1 STR submission

Here, the reporting parties were directed to 'New Report' and to choose web reports and STR in the drop down menu. The presenter added that FIA are looking to integrate goAML with other reporting systems in the different institutions and are in close contact with system providers for square print, Blue Print and Forex Print.

The attendees and the presenter went on to input the required information like the reporting entity number which is a reference number for a specific entity, the date, and name. Once this is done, the reporter will have to include the particulars of the transaction like a description of the transaction, the customer identification and the reason for suspicion. The presenter mentioned that discretion is paramount and entities can choose to continue with the transaction or not and detailed information should be filled in to make deciding if a transaction warrants investigation easier.

The presenter went on to explaining attachments and he stated that these were documentations relevant to the transaction that FIA could need, indicators which is a set of reasons the reporter believes the transaction is being done. goAML facilitates for three kinds of transacting parties i.e. people, entities or accounts



(which is reserved for banks). He also explained that conductor information refers to a middle man who carries out a transaction on behalf of another person.

In the case of attachments if any, these are copies of receipts of the transaction, copy of the National ID of the transacting parties etc. It was also advised that at each stage, persons should save their report work and once each section shows a green icon, the reporter can then submit the report.

Different persons seemed to be getting stuck in particular stages since this was a practical session and the trainer kept engaging with the participants to ensure that the process was done well and also answered any questions in a more intimate level.

The attendees went on to ask questions such as if there was a possibility to incorporate within goAML for forex bureaus to have information on wanted persons of suspicious conduct so that they can be flagged whenever they tried to input data. The presenter answered that Forex Bureaus should plan and access commercial databases systems like the UN website and the Asset Control list (OFAC) where suspicious personnel are listed.

It was asked if in case a reporter is making a report on a customer who kept coming back over a period of time carrying out suspicious transactions, could there be a possibility for the person's information to be recognized by the system so that some information can appear automatically once recognized? The presenter answered that the feature was currently not available but that it was a good feature that FIA could task the developers at UNODC to implement.

The Day One meeting was concluded at this stage.



# DAY 2

## PROCEEDINGS

The days' sessions were the second day of the two day workshop designed by the FIA to train different Forex Bureaus on the registration, use and application of the goAML web based program as a platform for report submissions to the FIA.

***Presenter - Mr. Ivan Bwire***

### **1. Continuation of submission of SARs.**

The presenter started by welcoming everyone to the day's session and assured them that all the intended activities for the day would be completed. He then quickly went over a brief summary of what was discussed the previous day. Considering that it was a practical exercise, he asked all persons involved to logon to the system and he went on to discuss the procedure which was basically the same as that of the Suspicious Transactions Reports done the previous day aside from a few differentiating features.

He directed all persons within the goAML platform to "New Report" then "Web Report". From there they were to choose SAR from the dropdown menu. Once the form appeared, one was supposed to input the reason as to why the activity was deemed suspicious and the corresponding action taken. Attachments were explained as a key requirement and indicators which are the reason one believes these suspicious actions are being done. Participants were then directed to choose whether the activity was done by a person or company, to scale the level for suspicion from 0 to 10, input the personal information of the customer and then submit.

It was noted that after submitting, the user may check on the submitted reports page to ensure that the report was successfully submitted to the FIA.

### **2. AIF submissions on goAML.**

The presenter noted that AIF stands for "Additional Information File". The reason behind this file was said to be that once a SAR or STR has been submitted to FIA, there is a likelihood that some information crucial to investigation or to warrant an investigation could be missing and as such FIA can send a message to the reporter asking for the said information. An AIF is how that extra information is submitted. The presenter noted that in most cases, the extra information are usually attachments to be added in the SARs or STRs like National ID of the customer, Incorporation details for an entity, etc.

Participants were then taken through the reporting process. They were directed to the goAML platform, to 'New Reports', 'Web Reports' and to choose 'AIFs' from the drop down menu. The form required a reference number and the presenter stressed that every letter or email sent in from FIA including letters asking for the AIF have



reference numbers. In this form, the FIU reference number requested for at this stage is extracted from the letter requesting for this AIF.

To create a bit of wide coverage out of this practice run, the presenter called for participants to use an entity like companies so that people can see the varying information given between persons and entities in a report. The information ranged from name, location, contact details, incorporation letter and the Director's biodata, ID information of the director or person acting on behalf of the entity and contact details.

When all information was completely filled in and marked green, the reporter would then submit their report. The presenter mentioned that more than one entry can be made within a report i.e. if someone wanted to report a suspicious activity carried out by a person and for an entity at the same time, the reporter can proceed to make a report for a person and add another entry for an entity within the same report.

The presenter asked if people had any questions. One of the attendees asked what an FIU reference was and the presenter answered that every letter sent from the FIA has a reference number that they use to track and monitor the message and this is the FIU reference. Another attendee asked whether a report can feature 9 clients at the same time and the presenter answered that yes. For instance if FIA asked for an AIF on multiple people of interest, all can be entered in one report. Another attendee asked that if the forex bureau did not have the information requested, how would the entity inform FIA of this?. He said that a message would be sent through the message board to convey the message to FIA and the FIU reference should be included within the message.

### **3. Message Board**

The presenter moved on to describe what a message board is stating that this was a medium within the goAML platform in which FIA communicates with financial institutions similar to an email platform. The







presenter then noted that every time information was delivered to a person through the message board from FIA, an email is sent to the registered email address of the receiving party notifying him that a message has been received. To access the Message board within the platform, there is a menu titled 'Message Board'. Messages within the Message Board have a maximum size of 200mb therefore, in order to avoid reaching the maximum mail box size, messages can either be deleted or archived. However, the presenter advised the participants not to delete some key messages for future reference purposes but rather use the archiving option.

One of the attendees went on to ask that in the event a report is filed and in a message via the message board that report has been rejected, does one have to file a new report? The presenter answered that once a report is rejected, one ought to revert it which makes the report a draft and can be edited to FIA's preference.

The presenter in concluding gave some guidelines on how the Message Board operates mentioning that the messages were grouped to within a month therefore, it was key to always look at Date ranges when searching for messages.

#### **4. LCTR / ALCTR Submission on goAML**

The presenter went on to ask people what Large Cash Transaction Reports (LCTRs) are and answering correctly, it was noted that Large Cash Transactions is considered under the Anti Money Laundering Act as any transaction(s) worth 20 million Ugandan Shillings or more made within a day and a LCTR is a report that reflects those transactions. It was also noted that an Aggregated Large Cash Transaction Report (ALCTR) is a report used to reflect the series of transactions made by a person or entity within a day summing up to 20 million Ugandan shillings or more but the separate payments can be less than 20 million Ugandan shillings individually. Also it was stated that all Large Cash Transactions are to be recorded and submitted to the FIA every Tuesday by 5:00PM.

Considering that the forms were similar to the rest and in a bid to see how much people have understood about the submission process, the presenter had one of the participating forex bureaus lead the practice run. He said he would keep mobile in the room helping whoever had an issue in regard to submission of the report. Before the participants started the practice run, he said they were to form one for a money transfer and the other for a



forex exchange. As the attendees did the test run, the presenter would explain which of the information was required to be input or not like the reason for the transaction, the action taken and attachments were not required. He also explained that some of the required information like under money transfers when inputting client information, the reporter should show the kind of relationship the Forex bureau shares with the customer i.e. when a customer is asked for ID when transacting with an institution, he or she becomes a client and if the money is sent and a receiver has to show ID the relationship becomes that of person-my client and the vice versa is true.

When the practice run reached the stage of making a transaction in forex exchange, the presenter mentioned that if in particular scenarios a customer walks to a forex exchange to change dollars to Ugandan shillings, when filling in the particulars of this transaction, the foreign currency is captured for the sender but if the customer walks in with Ugandan shillings to buy dollars, the foreign currency is captured for the receiver.

The participants went through the process while the presenter moved around the room helping whomever said was stuck and when the reports were finished and everyone had input the correct information, he gave them the green light to submit the reports.

It was asked by one of the attendees that on which days are the reports supposed to be sent? The presenter answered that for suspicious transactions and actions, the reports are to be sent immediately or at worst 48 hours after forming the suspicion. For the Additional Information file, within 7 days from receipt of the message asking for the additional information and for large cash transactions, the law requires that the information be relayed weekly i.e every Tuesday by 5:00PM.



## 5. Reactions

The speaker asked if there were any questions, reactions or comments thus far in the discussion to which all persons did not respond. The workshop then continued under the assumption that all people were satisfied and content with what information and procedures were relayed to them.

## 6. System Business Rules / FAQs

The presenter explained that these were the rules to be considered when filling in and submitting a report and that without compliance to these rules, the report being submitted would be rejected or partially accepted by the FIA. He showed a slide show listing these rules;

- Reasons for suspicious believe must be described when making STRs and SARs
- Every time when writing SARs and STRs, the action taken when faced with the suspicious action or transaction must be stated
- Either the Sender or the Receiver or Both should be captured as Clients of the Reporting Financial Institution.
- When filling in customer details, the reporter should use a passport for non-Ugandans and a government issued ID for Ugandan nationals to fill in details. The presenter did mention that NIRA is planning to start making Alien IDs for foreigners in Uganda so there must be need to add that in the future as a system business rule, and
- Large cash transactions are 20 million and above while aggregate large cash transactions should be different transactions individually less than 20 million but all summing up to 20 million and above.

Before going to the next stage, the presenter asked if there were any questions in regard to the business rules.

## 7. goAML Helpdesk

The presenter gave a brief description stating that the goAML helpdesk would be used for submission of system related queries describing the issue and that the FIA would work to rectify the issue. He explained that FIA opted to use the helpdesk system because it encourages proactive ticket management, reduced delays to render support when needed, improved automation and efficiency of the goAML support services, and better service quality.

He stated that access to the goAML helpdesk system required registration where the users are supposed to provide the organization email address which is to become the username and a password can be created. The presenter then emphasized



for participants not to forget their passwords. The presenter then logged in to the helpdesk and showed where messages can be sent and explained that this was to be monitored by the project manager. He also asked all persons after receiving the service or answer to their queries to please rate their experience.

## **8. Question and answer session**

The presenter asked if the attendees had any questions to FIA or comments or needed help in regard to the goAML System.

- One participant asked in regard to the registration process to goAML and how financial institutions are supposed to provide FIA with certificate of Incorporation, letter from the executive authorizing the users and scanned national ID or passports for the users. He wanted to know if these would be delivered physically or electronically to FIA. The presenter answered that the documents needed to be delivered physically to the FIA Offices so that they are stamped for receipt before being used in the registration process.
- Another attendee stated that their forex bureau once tried to incorporate a system much like goAML to automate their anti-money laundering detection and recording system but it was unsuccessful. He wanted to know if there was anything that would be done to those who might have difficulty incorporating goAML. One of the present FIA team members stated that the System will have to work and that all the requirements for this to happen are being met as the FIA is looking to have the goAML platform be the primary mode of report submissions and communications.
- Someone went on to ask when the requirements for registration will be allowed and received by FIA and the presenter answered from Monday 23rd November 2020 at 8am.
- It was asked when identifying suspicious transactions and someone receives income from multiple friends, why are they asked to tag such as a suspicious transaction? The presenter stated that most times when financial institutions call for money or transactions out of donors, relationships, pastors, brothers in Christ to be tagged as suspicious is similar to defensive reporting because in the event the bank or bureau lets such transactions executed and in the future they are classified as criminal, the institution faces a chance of being liable because a lot of criminal transactions are classified as donations or gifts. However, he noted that the suspicious transactions are based on the unusual nature of the transaction and the conversation held with the client. The reporting party should make a judgment call.
- It was asked if a boss forced an employee to make a transaction that was deemed suspicious in the future, does the liability fall on the employee or the boss? The presenter stated that the Money Laundering Act gives defenses and if the boss happens to be a person in charge of all monetary transactions, he faces the liability as the employee works in good faith. However, the liability will

be determined on the evidence presented if there is ever a case but employees could always consider whistle blowing.

- It was asked if the goAML system would allow multiple users with one taking center stage to supervise the work of the others and review it. The presenter said yes as that was one of the rights reserved for the admin user.

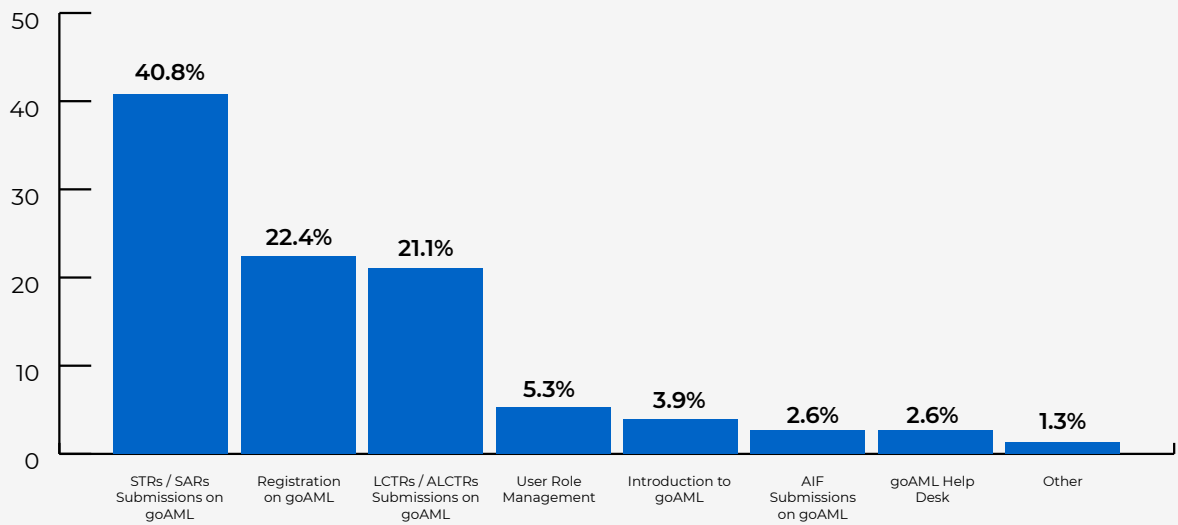
In conclusion the presenter said certificates would be given to each person upon completion of the training on the use of the goAML system and the web link used in practice runs in the training would remain active for institutions to carry out practice runs of their own to be well conversant with the system and that the live link for registration would be provided once the required documents are received.

## 9. Closing remarks from the project manager

The project manager, Ms. Sherifah Tumusiime thanked everyone for honoring their invitations, the moderators and presenters for their work and said she looked forward to the registration of all the trained Forex Bureaus on to goAML. She said that FIA once carried out a training of this nature on goAML but a small fraction of people actually registered and hoped the same would not be seen from this group of participants. She hoped to see positive results come time for their institutional visits.

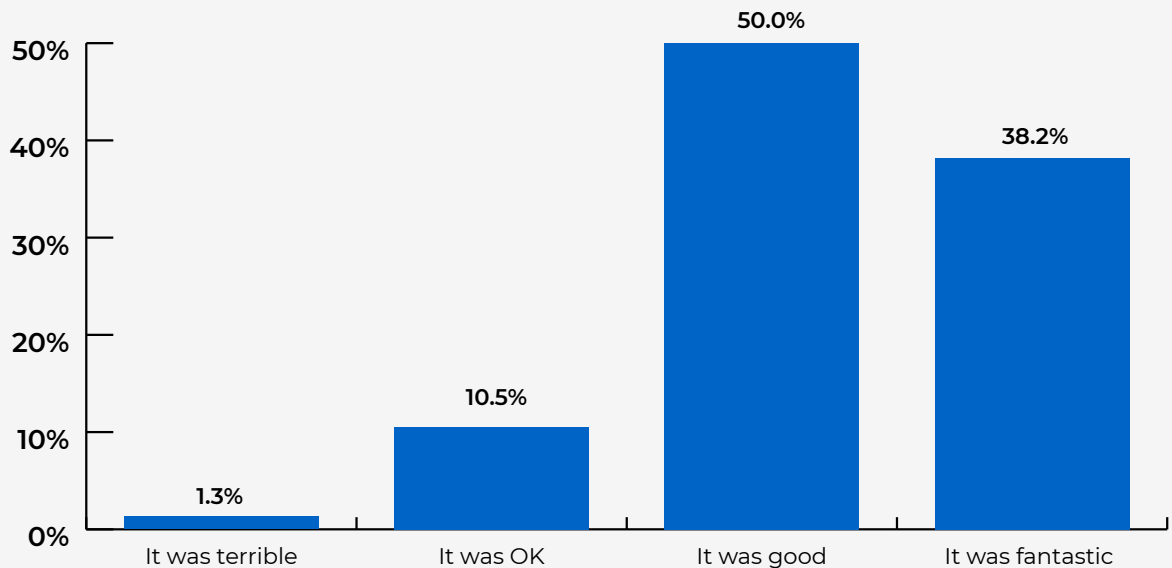


### What was the most interesting topic for discussion?



Majority of the participants found that the STRs/SARs Submission topic was the most interesting topic of discussion during the training because this was a very practical session and they learnt a lot.

### What did participant think of the training?





## Reasons behind the participants' ratings

### *It was terrible:*

- Participants with this rating stated that they were not sensitized to come with their laptops

### *It was okay:*

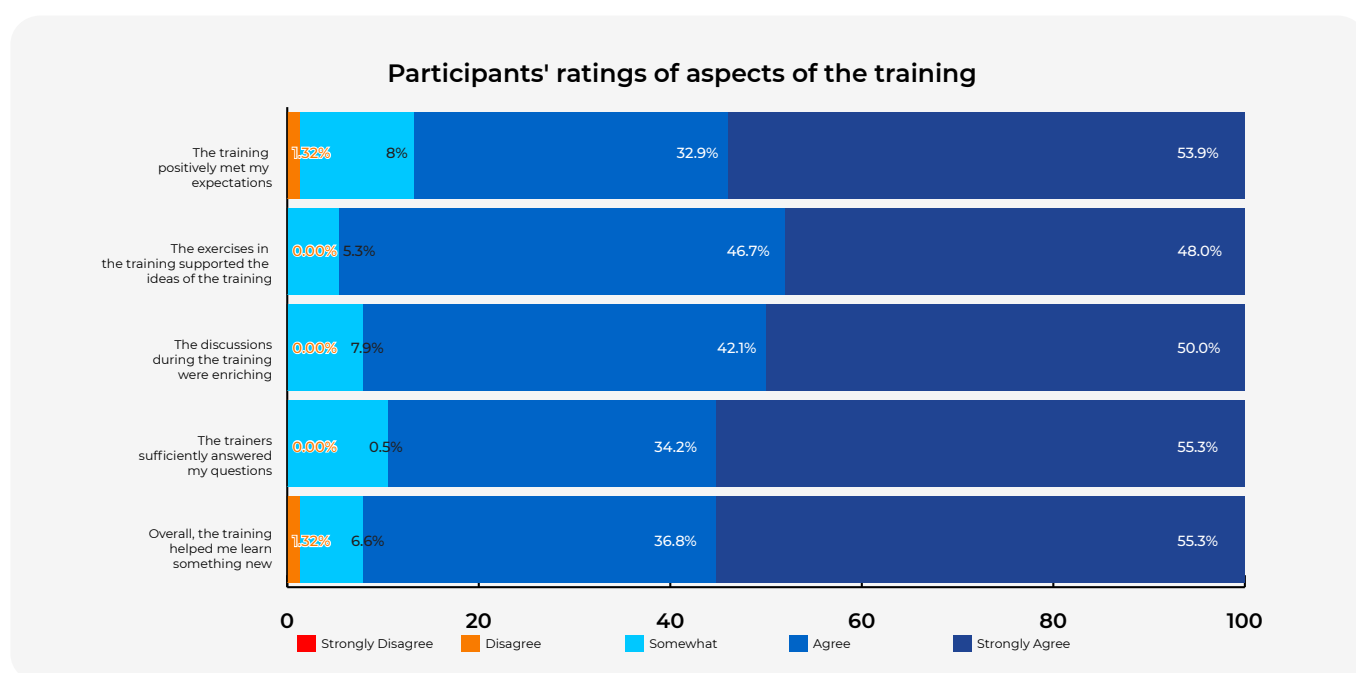
- The participants found that the training had no exceptional points and since this is something that is on a new system, there was not much to say on the training.

### *It was good:*

- The presentation was well executed, interactive staff, understandable content but it was not perfect.

### *It was fantastic:*

- The presentation was professionally delivered, understandable, audible and eloquent presenters



Participants were most pleased with how the trainers answered their (the participants') questions and the fact that they (the participants) learnt something new during the training. Although also rated very highly, the participants felt that the exercises carried out during training did not fully match with the ideas of the training.

## Questions and responses raised from the discussion



### *How many users can be created with goAML?*

The system doesn't limit the number of users but institutions are advised to nominate users applicable to the operational systems within the institutions.



### *Is there a possibility to incorporate goAML in forex bureaus to have information on wanted persons of suspicious conduct so that they can be flagged whenever they try to input data?*

Systems like the UN website and the Asset Control list (OFAC) that list high risk individuals.



### *In case a user is making a report on a customer who kept coming back over a period of time carrying out suspicious transactions, could there be a possibility of the person's information being recognized by the system so that some information can appear automatically once recognized?*

Unfortunately, this feature is not available but it is a good feature that the FIA will recommend to the System developers at UNODC.



### *What is an FIU reference ?*

Every letter sent from the FIA has a reference number that they use to track and monitor the message and this is the FIU reference.



### *Can a report feature (nine) 9 clients at the same time?*

Yes, for instance if the FIA asked for an AIF on multiple people of interest, one can respond by adding multiple entries in the same report.



### *If the forex bureau does not have the information requested, how would the entity inform FIA of this?*

A message should be sent through the message board to convey the message to the FIA.



### ***Can messages be deleted from the message board?***



It is possible to delete messages but it is preferable to archive messages instead so that it is possible to refer to them in cases where that information becomes relevant at a later time. If a message is deleted and needs to be later viewed, it cannot be recovered.

### ***In the event a report is filed and in a message via the message board that message is rejected, does one have to file a new report?***



Once a report is rejected, one has to revert it which makes the report a draft and thereby it can be edited to the FIA's preference.

### ***On which days are the reports supposed to be sent?***



For suspicious transactions and actions, the reports are to be sent immediately or at worst 48 hours after forming suspicion. For the Additional Information file, within 7 days from receipt of the message asking for the additional information and for large cash transactions, the law requires that the information be relayed weekly i.e every Tuesday at 5:00PM.

### ***With regard to the registration process on goAML and how financial institutions are supposed to provide the FIA with the certificate of Incorporation, letter from the executive authorizing the users and scanned national ID or passports for the nominated users. Will these be delivered physically or electronically to the FIA?***



The documents needed to be delivered physically to the FIA Offices so that they are stamped before being used in the registration process.

### ***Once an attendee's forex bureau tried to incorporate a system much like goAML to automate their anti-money laundering detection and recording system but it was unsuccessful. Is there anything that would be done to those who might have difficulty incorporating goAML?***



The FIA is dedicating all required resources to ensure that the goAML system is a success as its meant to be the primary platform for reporting.



***When will the requirements for registration be allowed and received by FIA?***

From Monday 23rd November 2020 at 8:30 AM.

***When identifying suspicious transactions and someone receives income from multiple friends, why are they asked to tag such as a suspicious transaction?***



The presenter stated that most times when financial institutions call for money or transactions out of donors, relationships, pastors, brothers in Christ to be tagged as suspicious is similar to defensive reporting because in the event the bank or bureau lets such transactions executed and in the future they are classified as criminal, the institution faces a chance of being liable because a lot of criminal transactions are classified as donations or gifts. However, he noted that the suspicious transactions are based on the unusual nature of the transaction and the conversation held with the client. The reporting party should make a judgment call.



***If a boss forced an employee to make a transaction that was deemed suspicious in the future, does the liability fall on the employee or the boss?***

The Money Laundering Act gives defenses and if the boss happens to be a person in charge of all monetary transactions, he faces the liability as the employee works in good faith. However, the liability will be determined on the evidence presented if there is ever a case but employees could always consider whistle blowing.



***Can the goAML system allow multiple users with one taking center stage to supervise the work of the others and review it?***

Yes, that is one of the rights reserved for the admin user.



## What could still be improved about the training

- A better internet connection. Many of the participants had difficulty accessing the internet during the training sessions.
- More clarification on the topics discussed. Some participants felt that the topics could have been discussed more extensively as opposed to having it in only a 2 day training.
- A refresher training session. Some participants felt that the FIA should hold a refresher training after one month or check on the participants in their respective organizations after the training.
- Communication on the details of the program. This was mostly related to the practical aspects of the training, which participants felt they were not well prepared for.
- Better presentation. Some participants stated that the font size used in the presentation was quite small and this made following the presentation difficult.
- Venue selected. Participants stated that they experienced difficulties in finding the venue and that the venue was quite far and difficult to access.
- Providing operational manuals. Participants stated that as much as the training was well executed, it would have also been helpful to have written manuals to accompany the goAML program.

Generally, participants preferred the second days of the training. However, the majority of the participants found the training to be good.



This report was prepared by SEMA. Do you have questions about this report or want to learn more about SEMA? Contact our Operations Manager Nsasiirwe Success Joanitah at +256 702 706120 | [joan@talktosema.org](mailto:joan@talktosema.org) Toll-free line: 0800 203 062 | [www.talktosema.org](http://www.talktosema.org) or email [info@talktosema.org](mailto:info@talktosema.org)