



CBAR XML Overview

Erika Borg
Senior Business Analyst on CBAR Project

Webinar – 6 May 2020



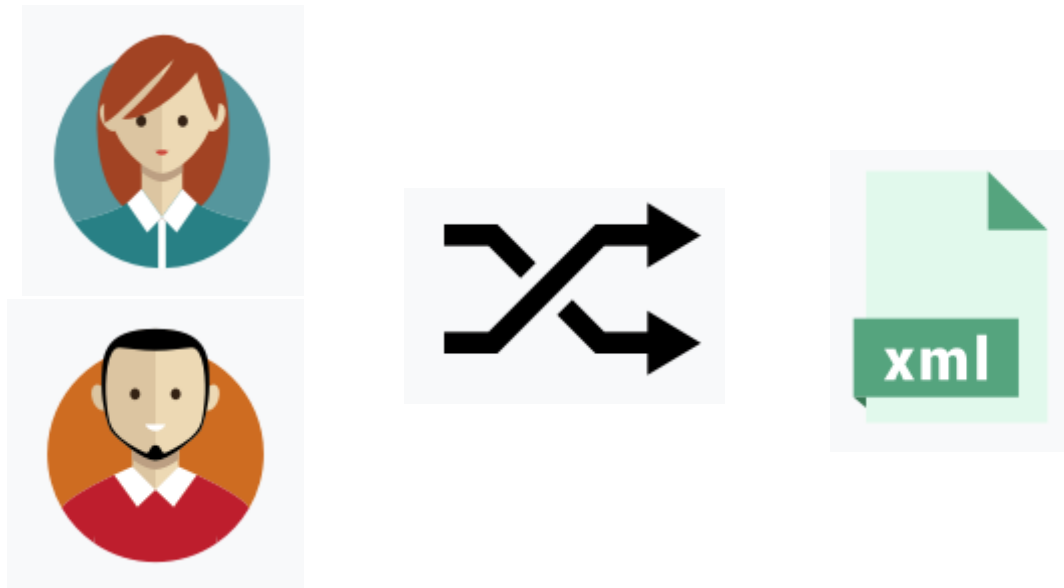
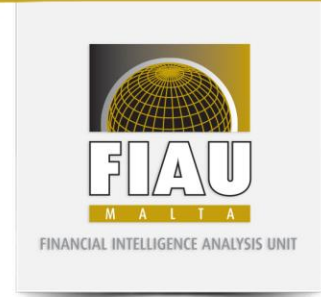
Agenda

- Overall Process
- XML / XSD Structure
- XML Examples
- Data Contents and Handling Closed Accounts
- File Naming Convention
- System Validation Rules
- Timelines



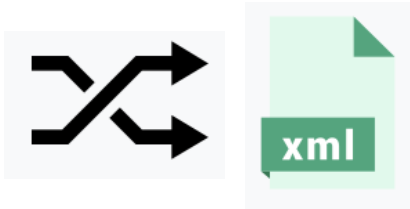
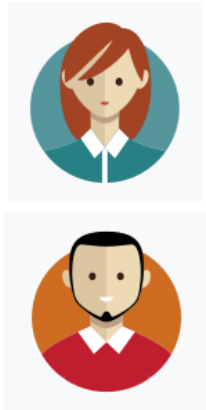
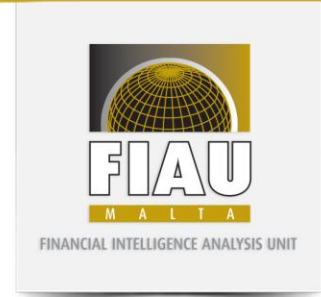
Overall Process

Overall Process – Step 1 – Bank Prepares Data in required XML Format

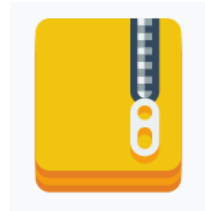


Reporting Time Window to Adhere to

Overall Process – Step 2 – Secure Submission of ZIP File



File is generated

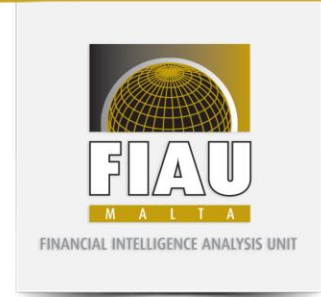


File is renamed
and Zipped



File is Submitted
securely to CBAR
Portal (after
Registration
Process)

Overall Process – Step 3 – Data Validation Process



Data Available
In CBAR



3 Levels of Validation



Accept Data

or



Reject Data

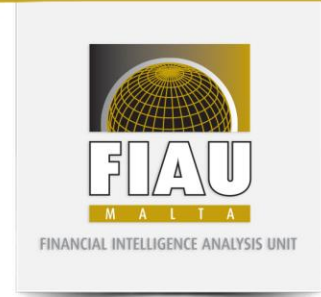


Reporting Time Window to Adhere to



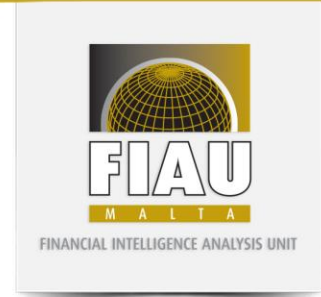
Rejected Data is not considered a submission.

Overall Process – Step 4 – Data in CBAR



Data Deletion Check process checks if there were accounts or persons that disappeared since your last submission.

Overall Process – Step 5 – Data in CBAR



CBAR **search** system allows FIAU Analysts and Law Authority registered users to analyse the data submitted by Reporting Entities



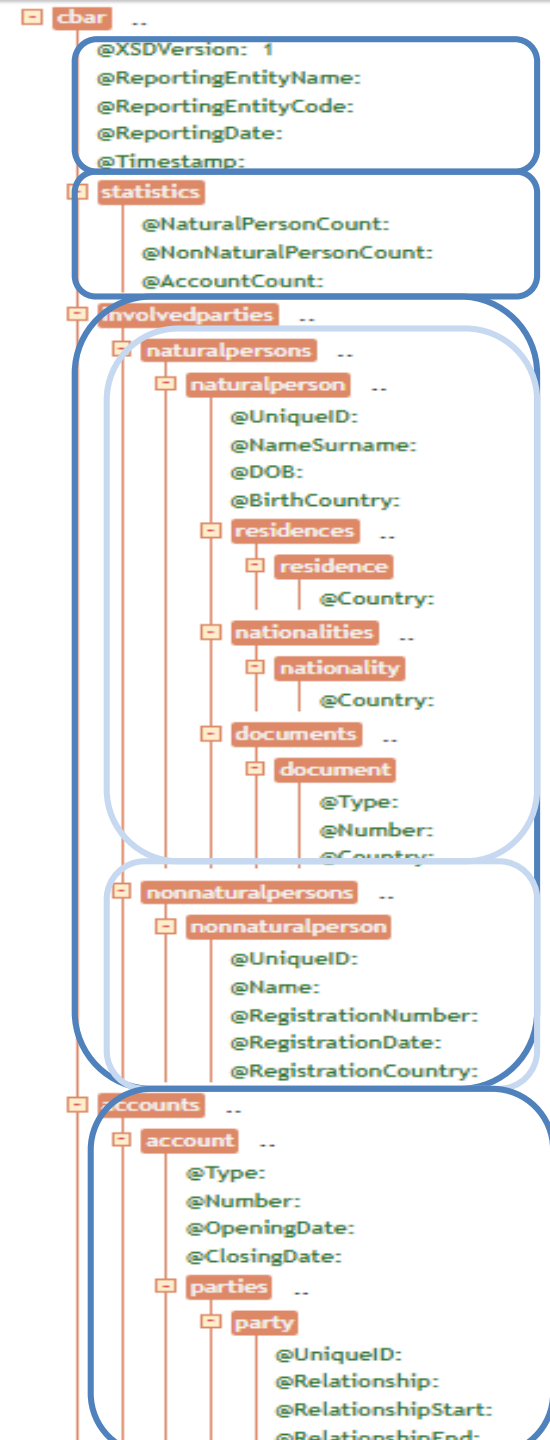
Overall Process – Step 6 – Communications from CBAR Team



Any communications will happen through the
CBAR portal



XML / XSD Structure



XML / XSD Overview

Structure is split into 4 main sections:

1. Header information
2. Statistical information
3. Involved Parties (Natural / Non-Natural)
4. Accounts

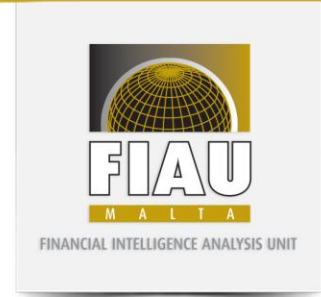


Overall Structure



```
<?xml version="1.0" encoding="UTF-8"?>
<CBAR XSDVersion="1" ReportingEntityName=" " ReportingEntityCode=" " ReportingDate=" " Timestamp=" " >
  <Statistics NaturalPersonCount=" " NonNaturalPersonCount=" " AccountCount=" " />
  <InvolvedParties>
    <NaturalPersons>
      <NaturalPerson UniqueID=" " NameSurname=" " DOB=" " BirthCountry=" ">
        <Residences>
          <Residence Country=" " />
        </Residences>
        <Nationalities>
          <Nationality Country=" " />
        </Nationalities>
        <Documents>
          <Document Type=" " Number=" " Country=" " />
        </Documents>
      </NaturalPerson>
    </NaturalPersons>
    <NonNaturalPersons>
      <NonNaturalPerson UniqueID=" " Name=" " RegistrationNumber=" " RegistrationDate=" " RegistrationCountry=" " />
    </NonNaturalPersons>
  </InvolvedParties>
  <Accounts>
    <Account Type=" " Number=" " OpeningDate=" " ClosingDate=" ">
      <Parties>
        <Party UniqueID=" " Relationship=" " RelationshipStart=" " RelationshipEnd=" " />
      </Parties>
    </Account>
  </Accounts>
</CBAR>
```

Element: CBAR



```
cbar ..  
  @XSDVersion: 1  
  @ReportingEntityName:  
  @ReportingEntityCode:  
  @ReportingDate:  
  @Timestamp:
```

Field Name	Field Type	Length	Description
XSDVersion	Numeric		The version of the schema being used. Leading zeros should not be included, for example "1" should be listed rather than "01" because "01" has a leading zero and this is not allowed.
ReportingEntityName	alphanumeric	Min 1 Max 100	This is the name of the Reporting Entity. This should match the name registered in the CBAR system.
ReportingEntityCode	alphanumeric	Max 10	This is the registered company number of the Reporting Entity as registered with MBR. This should match the registered company number in the CBAR system. Only letters and numbers are allowed.
ReportingDate	YYYY-MM-DD		The reporting date of the data being provided in the document E.g. 2020-03-24
Timestamp	YYYY-MM-DDThh:mm:ss		The submission timestamp (this can be a different date to the reporting date). Time should be in 24-hour format, example: E.g. 2020-03-24T14:30:22

Element: Statistics

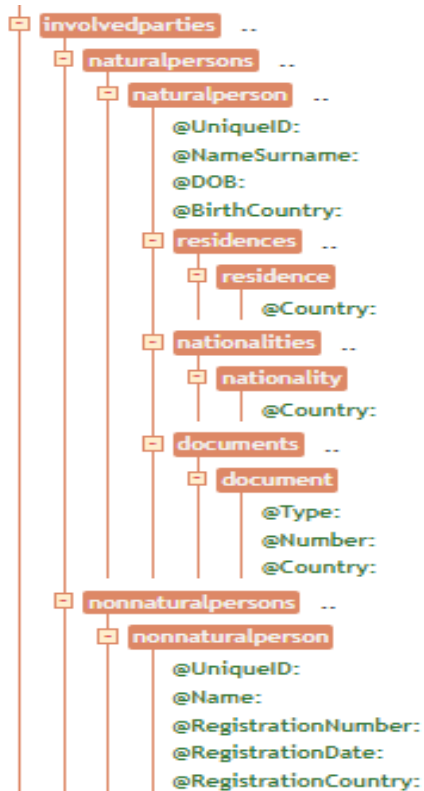


statistics

- @NaturalPersonCount:
- @NonNaturalPersonCount:
- @AccountCount:

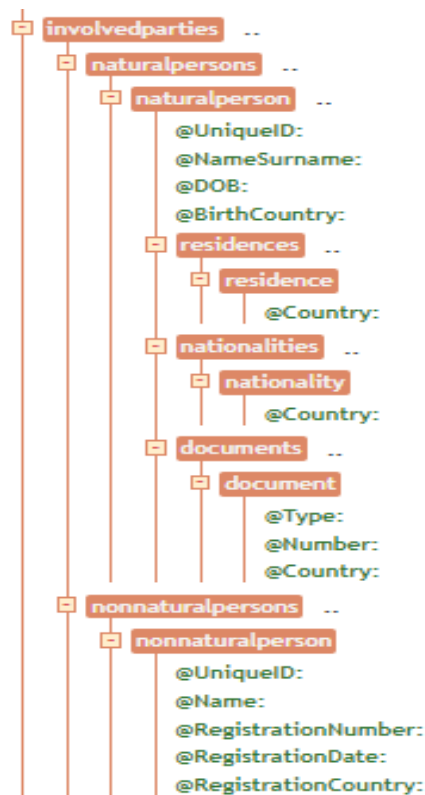
Field Name	Field Type	Length	Description
NaturalPersonCount	Numeric		The number of natural persons reported in the file
NonNaturalPersonCount	Numeric		The number of non-natural persons reported in the file
AccountCount	Numeric		The number of accounts reported by the reporting entity

Element: Involved Parties



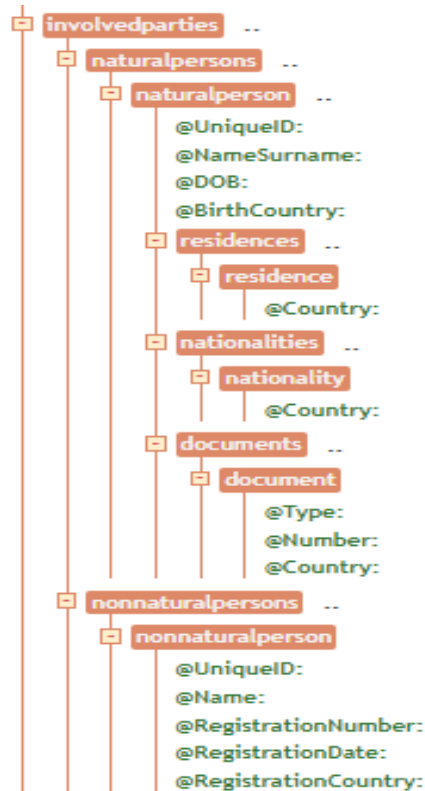
- Made up of 2 elements NaturalPersons and nonnaturalpersons
- In turn each will contain records of naturalperson elements and nonnaturalperson elements
- Each element of naturalperson can contain multiple element of residences, nationalities, and documents

Element: Natural Person



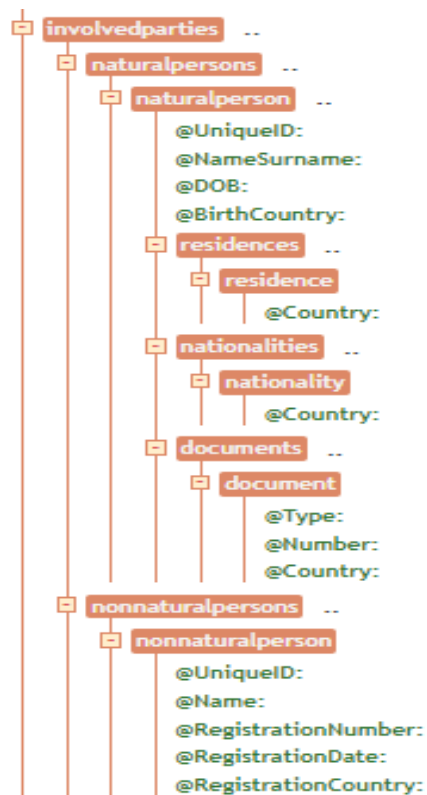
Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 50	This is the unique involved party ID used internally at the Reporting Entity
NameSurname	text	Min 3 Max 100	The full name and surname of the natural person. This should only be letters and spaces.
DOB	YYYY-MM-DD		The date of birth of the natural person
BirthCountry	text	Min 2 Max 2	The country of birth using the ISO 3166-1 Alpha 2 code standard
Residences>Residence>Country	text	Min 2 Max 2	Multiple Residence elements allowed The country of birth using the ISO 3166-1 Alpha 2 code
Nationalities>Nationality>Country	text	Min 2 Max 2	Multiple Nationality elements allowed The nationality of the person using the ISO 3166-1 Alpha 2 code
Documents			Multiple Documents elements allowed See below InvolvedParties>Persons>Person>Document

Element: Natural Person > Document



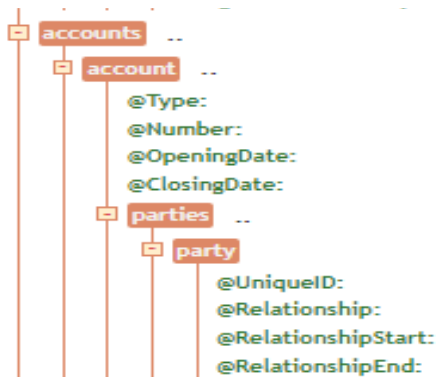
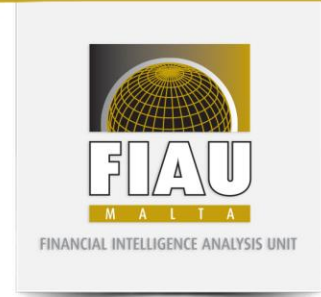
Field Name	Field Type	Length	Description
Type	text	Min 2 Max 2	One of the following Document Types are allowed: <ul style="list-style-type: none"> PP (passport) ID (national id) DL (driver's license) RP (residence permit) AS (asylum seekers document) OT (other document) The two-letter code should be used in the XML file.
Number	alphanumeric	Min 1 Max 50	The document number of the person for the specified type
Country	text	Min 2 Max 2	The country of issue of the document using the ISO 3166-1 Alpha 2 code

Element: Non-Natural Person



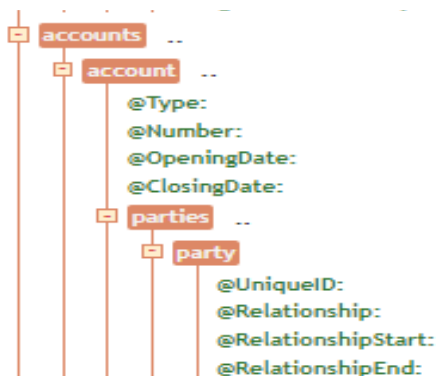
Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 100	This is the unique involved party ID used internally at the Reporting Entity
Name	text	Min 1 Max 100	The non-natural person name
RegistrationNumber	alphanumeric	Min 0 Max 50	The non-natural person registration number, when available (OPTIONAL)
RegistrationDate	YYYY-MM-DD		Company date of registration or date of incorporation, when available (OPTIONAL)
RegistrationCountry	text	Min 2 Max 2	The country of company registration using the ISO 3166-1 Alpha 2 code (OPTIONAL)

Element: Account



Field Name	Field Type	Length	Description
Type	text	Max 4	The following values are accepted: <ul style="list-style-type: none"> ▪ IBAN ▪ SDB (safety deposit box) ▪ SCS (safe custody service)
Number	alphanumeric	Min 1 Max 50	This is either the IBAN or safety deposit box unique identifier or the safe custody unique identifier
OpeningDate	YYYY-MM-DD		The date which the account was opened on
ClosingDate	YYYY-MM-DD		The date which the account was closed on (OPTIONAL) If this is not provided this indicates that the account is active.
Parties			Multiple party elements allowed See below: Accounts>Account> Parties > Party

Element: Account > Parties > Party



Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 50	This is the unique account holder ID used internally at the Reporting Entity. This should match with the UniqueID of a naturalperson or non-naturalperson provided in the file.
Relationship	text	Min 2 Max 2	One of the following Relationships are allowed: <ul style="list-style-type: none"> AC (account holder) UB (ultimate beneficiary owner) SG (signatory) AG (agent) The two-letter code should be used in the XML file.
RelationshipStart	YYYY-MM-DD		The date of relationship start for the account, for the party (OPTIONAL). For UB relationships, RelationshipStart should be blank. All other types should provide a value.
RelationshipEnd	YYYY-MM-DD		The date of end of the relationship for the account, for the party (OPTIONAL). If not active this should be mandatory (except for UB relationships where this should not have a value)



XML Examples

XML Examples – Example 1

- Natural Person with multiple documents
- Non-Natural Persons with and without registration information
- Accounts with
 - single account holder,
 - joint account holders,
 - Ultimate beneficiary and signatories mix

XML Examples – Example 2

- Single account holder for a natural person account
- Single account holder a non-natural person
- An approach to tackle ultimate beneficiary owners which may not have a unique ID within the core banking / financial solution available at the Reporting Entity



Data Contents
Incl. Closed Accounts

Data Contents and Closed Accounts / Relationships

- Submissions must always include the **FULL dataset**
- **Accepted Alphabet** used in file submission should be in Latin characters, but should be able to accept European characters such as á â ã ä etc.

A to Z, numbers, dashes, special characters (for non-person), and accented characters (Á Á à À â Â ä Ä ã Ã å Å æ Æ ç Ç é É è È ê Ê ë Ë í Í ì Î î Ï ï Ñ Ñ ó Ó ò Ò ô Ô ö Ö õ Ö Õ ø Ø œ Œ ß ú Ú ù Ù û Û ü Ü).

- Closed Accounts or close relationships must be included for a full month following closure.
 - Accounts and Relationships that are terminated may only disappear once they have been provided as closed during the first month

Closed Accounts Explained

- Account was closed on the 20200315 (i.e. ClosingDate field is filled in) and you are reporting data on the 20200318, the account and natural/non natural person details should still be reported until date of account closed + 1 month.
- So that would be mean 20200414 would be the last time this closed account is reported and on the 20200415, this would not be featured.
- The same example holds for a person (natural / non-natural) who is no longer an involved party. The person (natural or non-natural) would need to feature for an additional 1 month since when the relationship has closed (i.e. RelationshipEnd date is filled in).
- if ClosingDate is 15-Jan, then it needs to be reported until 15-Feb (not inclusive)
- if ClosingDate is 15-Feb, then it needs to be reported until 15-Mar (not inclusive)



File Naming Convention



FINANCIAL INTELLIGENCE ANALYSIS UNIT

Files and Filename

Filename should be of the following format:

- **CNUM_CBAR_YYYYMMDD_YYYYMMDDhhmmss.XML** and this file should be zipped as follows: **CNUM_CBAR_YYYYMMDD_YYYYMMDDhhmmss.ZIP**
 - CNUM represents the registered company number of the reporting entity to submit their information as it has been decided that the reporting entities identification throughout both filename and contents will be the company number (registered with the MBR).
 - YYYYMMDD represents the reporting date (this should match the field ReportingDate in the file)
 - YYYYMMDDhhmmss represents the timestamp the file was generated (24 hr format) (this should match the field Timestamp in the file)
 - The zip file should only contain the one .XML file
 - The zip file should not be password protected



Validations on Data Submitted

Automatic Validations

- The CBAR system will carry out 3 levels of validation: schema, statistical and detailed validations.
- Errors are always provided to both CBAR and Reporting Entity (so its important to check your data before submitting)
- If Level 1 schema checks fail, this is a blocker and errors are provided without running level 2 statistic and level 3 detailed validations. If Level 2 statistical or level 3 detailed validations fail all the errors for both levels are provided.
- The data will not be accepted into the system prior to this passing all three levels of validations.

Level 1 – Low Level and Schema Checks

These are schema low level checks based on the technical schema specifications, filename and acceptable reporting entity details/timeframe. Some example of schema checks includes:

- Filename format
- Verification of file against the schema
- Company number and Company Name of reporting entity matches submitting user reporting entity
- File reporting date is received within the allowed time period
E.g. ReportingDate within last 5 days
- Timestamp must be greater than the last file received in CBAR by the reporting entity
- File submitted ReportingDate cannot be smaller than the last file submitted
E.g. if 20200409 reporting date file was submitted, 20200408 file will not be accepted subsequently

Level 2 – Statistical Checks

This is based on the statistics provided in the file and the data contents

statistics

- @NaturalPersonCount:
- @NonNaturalPersonCount:
- @AccountCount:

Rule#	Name	Description
L2.1	Number of natural persons does not match	This validates that the number of natural persons reported in this field matches the submitted natural persons
L2.2	Number of non-natural persons does not match	This validates that the number of non-natural persons reported in this field matches the submitted non-natural persons
L2.3	Number of Accounts does not match	This validates that the number of accounts reported in this field matches the submitted accounts

Level 3 – Detailed Validation Checks

This is used to allow more detailed validations e.g. Mandatory fields based on conditions

L3.1	Invalid Reporting Date	The reporting date cannot be future dated
L3.2	Invalid Timestamp	The timestamp cannot be before the reporting date
L3.3	UniqueID must be unique	UniqueID must be distinct across both natural persons and non-natural persons. For example, if a Natural Person has UniqueID '12345', no other Natural or Non-Natural Person should have the same UniqueID.
L3.4	UniqueID not found in Involved Parties	UniqueIDs found in Accounts must be found in Involved Parties details
L3.5	Account Number should be unique	Any IBAN, safety deposit box identifier, custody boxes identifier must be unique. The number should be unique across all three types. For example, if there is a safety deposit box with number '4556111215', there should not be another safety deposit box/IBAN/safe custody with the same number.
L3.6	Duplicate involved party in account	Involved party should not be found more than once per account with not the same opening date
L3.7	Invalid Maltese ID	Validation of Document Number when Document Country = MT. Number of characters should be greater than 4 in length and must end with A,B,G,H,L,M,P or Z
L3.8	Invalid person name provided – missing space	Person NameSurname field must be separated by at least one blank space
L3.9	Invalid person name provided – inclusion of numbers or special characters	Numbers or the following special characters should not be permitted in person names / @ ! , " () * % \$ # ; < > ? [] ^ _ = + ~ \
L3.10	Invalid alphabet identified for natural person	The following alphabet is accepted: A to Z, a to z, numbers, dashes, and the following accented characters. Á Á à À â Æ Ä Å Æ ç Ç é É è Ê ë Ë í Î ï Ì Ï Ñ Ó Ó ò ò ô Ô õ Ö Ø ø Æ Æ ú Ú ù Ù û Ü ü

Level 3 – Detailed Validation Checks

L3.11	Invalid alphabet identified for non-natural person	<p>The following alphabet is accepted: A to Z, a to z, numbers, special character as follows:</p> <p>` ! # \$ % ^ & * () - _ = + [] { } “ ’ @ \ / </p> <p>and the following accented characters.</p> <p>Á Á à À â Â ä Ä å Ã ã Å æ Æ ç Ç é É è È ê Ê ë Ë í Í ì Î î Ï ñ Ñ ó Ó ò Ò ô Ô ö Ö õ Ö Õ ø Ø œ Œ ß ú Ú ù Û û Ü ü Ü</p>
L3.12.1	Invalid person date of birth – Future Dated	Validates that no dates are after the reporting date and also validates that no dates are earlier than 19100101
L3.12.2	Invalid non-natural person registration date – future dated	
L3.12.3	Invalid account opening date – future dated	
L3.12.4	Invalid account closing date – future dated	
L3.12.5	Invalid involved party relationship start – future dated	
L3.12.6	Invalid involved party relationship end – future dated	
L3.13	Invalid account closing date – before start date	The account closing date should be on or after the account start date
L3.14	IBAN provided is invalid	When account type is IBAN, the IBAN is validated against the format of Maltese IBANs
L3.15.1	Invalid person birth country provided	Validates that the Country matches with a Country present in the CBAR system (using the ISO 3166-2 Alpha 2 code format).
L3.15.2	Invalid person nationality provided	
L3.15.3	Invalid person document country provided	
L3.15.4	Invalid non-natural person registration country	



FINANCIAL INTELLIGENCE ANALYSIS UNIT

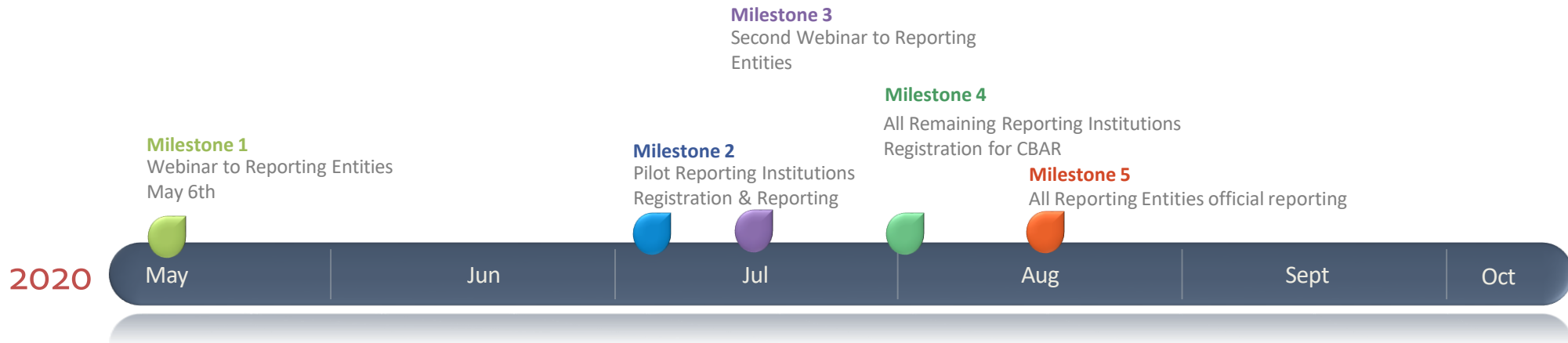
Level 3 – Detailed Validation Checks

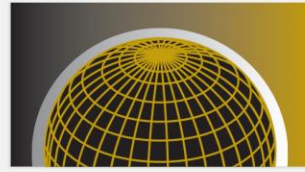
L3.16	Involved Party relationship not valid. Signatory only allowed for natural persons.	Validate that the involved party relationship signatory is only used for person of type natural person
L3.17	Involved Party relationship not valid. Agent only allowed for Account Type SDB and SCS.	Validates that involved party relationship value agent is only allowed when the account type is a safety deposit box or safe custody
L3.18	Duplicate residence for natural person	The same residence iso code is not permitted for the same person
L3.19	Duplicate nationality for natural person	The same nationality iso code is not permitted for the same person
L3.20	Same document type and number is not allowed	The same document type and number is not allowed to be used in more than one Natural Person
L3.21	Relationship Start cannot be before Opening Date	The party relationship start cannot be before the account opening date
L3.23	Closed Accounts older than 1 month should not be provided	Closed accounts should only feature for the subsequent month
L3.24	Closed Relationships older than 1 month should not be provided	Closed relationships should only feature for the subsequent month
L3.25	Party with Relationship 'UB' should not have a Relationship Start or End date	If the account party relationship is UB, RelationshipStart and RelationshipEnd should not have a value
L3.26	Party with Relationship 'AC', 'AG' or 'SG' must have a Relationship Start date	If the account party relationship is not UB, then the RelationshipStart must be provided



Timelines

Timelines





FIAU

M A L T A

FINANCIAL INTELLIGENCE ANALYSIS UNIT

Thank You

CBARTechnical@fiumalta.org

65C, Tower Street, Birkirkara BKR 4012, Malta

T. (+356) 21 231 333 F. (+356) 21 231 090 E. info@fiumalta.org W. fiumalta.org
