



# goAML System

## Technical Questions and Answers

**19/08/2020**



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## Introduction

The FIAU has gathered all the technical answers to the questions asked by various subject persons on the new suspicious transaction reporting ('STR') system which has recently replaced the old PDF document submission system.

The below FAQs are categorised by the system functionality and by specific sectors, such as the gaming industry.

The purpose of this document is to provide further information on how to use the system as a basic user and to also provide further information for the specific subject persons that need to integrate with the XML Schema.

For further information please contact us on [goAMLSupport@fiumalta.org](mailto:goAMLSupport@fiumalta.org) for general support questions and [goAMLTechnical@fiumalta.org](mailto:goAMLTechnical@fiumalta.org) for XML related questions.

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## Registration and Logging On

**Q** When trying to log on, after inputting my user name and password the system is requesting a code, stating "*Your login is protected with an authenticator app. Enter your authenticator code for goAML Web below.*" I am not aware of this code

**A** For additional security, the FIAU is protecting goAML with multi-factor authentication ('MFA') which uses a time based code generated by an authenticator app. You can download the 'Google Authenticator' or the 'Microsoft Authenticator' App, however this app will only work if you have scanned the QR code initially when logging in the first time. If you have not scanned the QR code with the authenticator app on time, you will need to contact us on [goamlsupport@fiumalta.org](mailto:goamlsupport@fiumalta.org) to reset your QR Code registration. This will allow you to scan the code on the next attempt and complete your MFA setup. Once the QR code is scanned, you will be provided with a time based code on your authenticator app to specify after entering the username and password. The login procedure provides a fall-back procedure were the code is sent via email to your registered email address.

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**Q** I have logged in after inputting user name and password but could go no further than this (view screenshot) – this is referring to the authenticator

**A** The 'code' which the system is referring to can be accessed by either downloading a two-factor authenticator code (example: Google Authenticator) or else you can use the fall-back authenticator were you will receive an email every-time you need to log in.

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**Q** I have registered for the goAML Test Environment user last week and so far I cannot log in to the application. Are there any additional steps required from our side?

**A** In order to log in successfully, make sure that you are using the web browser Google Chrome; furthermore type in the username you created not the email address and type in the password. If such error persists kindly click the 'forgot password' and go through the procedure to change password. After you have entered your username and password, you also have to provide the two factor authentication code from your authenticator app.

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**Q** I tried to reset the password as suggested but I cannot proceed, error message is "Error processing request. Please ensure data entered is correct (username/email)" I can confirm the user name and email address are correct and I am using Google Chrome as my web browser.

**A** When trying to submit the username and email address to reset your password, refresh the CAPTCHA code image to ensure the correct code is specified. Also ensure that you are logging in within the right environment (PROD or TST). The password reset will not work if you have specified the email address incorrectly. If the issue persists, contact support to verify the email specified.

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**Q** I have two questions regarding the registration of a person on goAML Production Environment. One of the fields which I must complete in the registration form is the Organisation ID field. The bank's ROC Company ID is XX 123 but the field only allows numerical characters. Can you please explain what I need to do to fill in this tab? There is also an attachment tab, what are we supposed to attach in the attachment tab?

**A** All entities and professionals should register as an organization through the organization form. Professionals should specify the 'Suffix / Type of legal Entity' as a 'Professional'. The individual registration form is only applicable to the organizations that are already registered and have an organization ID generated. The organisation ID will be available once we approve the registrations.

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## Report Submissions

**Q** We recently tested the Web Report functionality for submitting an STR and we noticed that the report was sent and validated without having to pass through a second approver. Our question is, once we go Live, will submitting an STR require a second approver? Will a Compliance officer fill in the fields and the MLRO then have to check and submit the report? The same question is valid for XML submitting reports.

**A** The goAML web portal allows the admin user (MLRO) to set roles for his users as a Reporting Entity Admin, Reporting Entity User or Data Entry User. This can be done by logging into the portal, go to Admin> User-Role Management, select the user and change the roles from the tick boxes indicated on the right hand side. Roles are predefined as RE Admin, RE User and Data Entry. Each role has different permissions assigned to it. This will allow the data entry user to draft reports without submitting and the MLRO would then be able to review and submit the reports accordingly.

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**Q** We are opting to go for the Web format to input new STR, SAR reports and for Request for Information purposes. In such cases are we required to provide attachments in XML format or would a PDF suffice? This given that all data would have been manually inputted in the system?

**A** Attachments required in XML format, are those which contain transactional data. Other documentation such as account opening forms, CDD documents etc. need to be attached in pdf format as per the usual.

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**Q** Apart from STRs and IRDs there is an option called 'additional information file'. Can you please tell us what needs to be uploaded here?

**A** Additional information files are intended to be used to send additional attachments following a submission of an STR or to reply to our request in case of a positive reply (to attach transactional details etc.)

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**Q** Should the Banks report all PEPs or only when there is a suspicion of AML?

**A** PEPs should only be reported in case there is a suspicion of AML. Kindly note that these kind of reports should be submitted as a PEPR, which is specifically intended for suspicious reports relating to PEPs.

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**Q** With regards to IRDs if we have no relationship with the person/ entity for which the information is being requested , are we still required to compile the report?

**A** Requests from the FIAU will be sent using the message board (in the goAML web portal), so in the case of nil replies you are requested to reply back on the message board accordingly. In the case of a positive reply you are requested to notify us using the message board of the hit and that an additional information file (AIF) has been uploaded by the bank accordingly.

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**Q** Under activities and report parties we need to input a field called significance (number from 1 to 10) and reason. Can you please provide us with the significance of the numbers and in case of IRDs, if we have no relationship with the person/ entity should we put it 0?

**A** Significance represents the significance of a party vis-a-vis the report being submitted. The higher the number, the higher the significance of the party in the report. When in doubt of the actual significance please select the highest value i.e. 10.

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## Test Environment

**Q** I tried to log in the goAML testing with the link hereunder and was informed that this 'Webpage cannot be Found'. I noticed a change in the FIAU website so I understand that this should be the reason. Please provide new link.

**A** Kindly use the link below.

<https://goaml.fiaumalta.org/TST/>

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**Q** I am not able to log into the GoAML system. I know my password but it doesn't let me in. Meantime, when I try to reset the password, system is asking Username, can you kindly advise what user name I should use, as I do not recall creating one?

**A** Kindly note that the reference number you provide is related to the prod environment. We are not yet accepting registrations on the prod, thus it will not let you to log in.

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**Q** RFIs-requests for information will also be submitted via the GoAML Module. Is there a way to test this as well?

**A** Yes, requests for information will be sent via the goAML message board.

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## XML Schema

**Q** If we are still required to provide the attachments in XML format – could you kindly provide us with the data fields required for the XML schema?

**A** Please find all the relevant information on the XML Schema including technical documentation, XML examples and XML validator on <https://fiaumalta.org/report-a-suspicion/> under the heading "Technical STR Reporting Instructions (goAML)"

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## Message Board

**Q** The bank tackles FIAU RFIs on STR/SARs and other RFIs separately. The Investigations Team carries out submission of STRs and STR-related RFIs and the Regulatory Orders Team answers new RFIs and Production Orders. Both have separate mail boxes and separate lines of command. The Bank is requesting 2 separate inboxes within the GoAML platform. The Bank would also like to ask about restricting the access to the STR and STR-related RFIs to an appropriate group of people in order to preserve 'need-to-know' principle.

**A** The bank as a subject person has one unique message board on the FIAU reporting portal (goAML web application). However, the bank has the following options at their disposal to customize the access to the message board inbox:

**A.** **a.** Use roles to distinguish which users have access to the message board. You can define a role that has access to the message board menu item and then map the users to that role. All other users will not be able to access the message board.

**b.** Create rules to move messages of a certain message type e.g. RFI to a special folder on the message box automatically. As such, users that respond to RFI requests will access that folder and reply for the RFI(s) from there.

It is important to note that goAML is a generic application that is not customizable by FIAU. Hence, requesting features by subject persons is not feasible.

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**Q** The Bank has noted that communications do not show the sender's email. Is information available in the Production Environment (this is something we track for audit purposes).

**A** The message board is a secure message exchange mechanism between subject persons and FIAU. It does not use email for transmission of information. Hence, messages sent from FIAU to any other subject person will neither show the originator name nor their email address.

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## Transaction Reporting

**Q** The present mechanism differs substantially from what is being requested. Presently we report single-sided transactions, whereas the new requirement is for dual-sided entries i.e. originator and recipient of funds. This creates an issue with certain transactions as we do not hold historic info.

**A** The mechanism does not differ. The other side of the transaction reported in excel is the account owner and the account detail in question. It is implied for debit transactions that the initiator (FROM side) is the account for which the statement is generated and for credit transactions that the beneficiary (TO side) of the transaction is the account for which the statement is generated. As such, simply put the account details, signatories and related entity in the 't\_from\_my\_client' for debit transactions and the 't\_to\_my\_client' for credit transactions.

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**Q** The present feed does not cater for certain products that pass through the Bank suspense accounts – these are mainly commercial related contracts like Letters of Credit or invoice finance but also include credit card transactions. Although due diligence is done on this documentation, the actual end-to-end transaction information is on other systems that are not linked with the xls files that are currently being sent to the FIAU. The process of linking all this data will require a substantial amount of effort. The Bank envisages that this is not just a plain conversion to XML and we will need to tackle this in phases which require time to execute - at least 6 months as a best case scenario.

**A** The FIAU does not need any suspense accounts or transactions reported. FIAU needs, in the FROM side, the actual initiator details and in the TO side the actual beneficiary details. Any suspense accounts used by the bank to process the transactions MUST NOT be reported as it would create confusion within the FIAU intelligence databases.

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## Gaming Operators

The below are specific questions related to the gaming operators

**Q.** To which email address should we send XML reports?

**A.** Every subject person should be registered on the goAML system. This registration will provide reporting entities with access to log in to the system and submit reports directly through goAML.

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**Q.** In the case that suspicion is not related to a transaction what should be entered in the fields “Institution Name” and “Institution Code”?

**A.** These fields are only to be filled, in the case of reports involving transactional activity. In the event that the report being submitted does not involve any transactional activity (ex. In cases where a client was refused at on-boarding stage due to suspicious behaviour or suspected involvement in illicit activity), then a suspicious activity report (SAR) is to be submitted. In this report type there is no requirement to provide the aforementioned information.

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**Q.** Is it obligatory to report via XML or will web forms remain permissible?

**A.** Web forms will remain permissible; however, all transactional information has to be provided in full, including transactional activity which took place prior to or following the transaction/s which raised suspicion and therefore led to the submission of the report. In view of the large quantity of data involved in such a provision, it is unrealistic to manually fill out a web form containing transactional data dating back a number of months and possibly years. It is due to such requirements that reporting via XML will become obligatory as of 22<sup>nd</sup> August 2020. Furthermore this method of reporting will also enhance the analytical potential of the FIAU, allowing for a stronger and timelier analysis to be carried out.

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**Q.** I have not received any XML schema in order to comply with such a reporting requirement.

**A.** This is available on the FIAU’s website through the link <https://fiaumalta.org/report-a-suspicion/>

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**Q.** My entity is already registered on the Production environment. As a result is the Test environment still available?



**A.** Yes the test environment is still available. Registration is required to access this environment.

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**Q.** I have a report where the main suspicion was the client's behaviour however my report was rejected. Since there were transactions I was informed that this should be submitted as a STR. In this case should I just pick one transaction?

**A.** In this case it is actually all the transactions which are suspicious and therefore all should be reported. If the transactional history is extensive then the information should be submitted using XML.

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**Q.** If I need to report 15 people who are linked should I submit 15 reports?

**A.** No. One report is sufficient however the report should include the details of all 15 people.

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**Q.** What should I use if there is no indicator highlighting my suspicion?

**A.** In such cases use the indicator – other and specify in the comments what is meant by this selection.

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**Q.** Given that in most cases a transaction is involved does this mean that most submissions will be STRs?

**A.** Correct. Especially in the gaming industry most reports will involve transactional activity and will therefore need to be submitted as STRs. One example of an STR within this sector is in the event that suspicion is raised at on boarding stage prior to any transactional activity taking place.

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