

# Guidance Note on Mononymous Natural Persons

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The Financial Intelligence Analysis Unit (FIAU) was notified by subject persons about certain (potential) customers that are found to be bearing only one name on their identification documents. In this Guidance Note, the term “mononymous persons” refers to natural persons who have only one name listed on their identification document and, therefore, cannot provide a forename/surname. Through this Note, the FIAU is providing guidance relating to the AML/CFT measures subject persons need to take when required to identify and verify the identity of natural persons who have only one name listed on their identification document.

**The publication of this Guidance Note is also an opportunity for the FIAU to provide examples on how the risk-based approach should be applied in the different scenarios that subject persons may encounter in adhering to their AML/CFT obligations.**

In terms of Regulation 7(1)(a) of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR), one of the required Customer Due Diligence (CDD) measures is the identification of the customers, and the verification of their identity. Where applicable, subject persons should also carry out identification and verification of the identity of the beneficial owner/s in terms of Regulation 7(1)(b) of the PMLFTR.

While identification means obtaining a set of personal or identifying details on the customer, the verification process entails verifying the customer’s identity based on documentation, data or information obtained from reliable and independent sources. The objective of carrying out identification and verification is for subject persons to ensure that they can demonstrate that they know and have verified that the customer exists, and that the customer is who they purport to be. Identification and verification procedures also assist in ensuring that the customer is not acting anonymously or under a fictitious or stolen identity.

According to the risk-based approach, the identification and verification measures adopted should be commensurate with the risk of ML/FT identified through the Customer Risk Assessment (CRA). Subject persons are then expected to apply any AML/CFT mitigating measures in a way that guarantees that these are applied only where and when necessary.



Section 4.3.1(i) of the Implementing Procedures Part I sets out the standard set of personal details that are to be obtained for customers that are natural persons:

1. Official full name
2. Place and date of birth
3. Permanent residential address
4. Identity reference number, where available
5. Nationality

In low-risk situations, subject persons will be considered to have satisfied the identification requirements by obtaining only these three details:

1. Official full name
2. Date of birth
3. Permanent residential address

Whenever subject persons are requested to identify and verify the identity of natural persons (customer/s and/or beneficial owner/s) who do not have a full name (i.e., name and surname), and who therefore have only one name listed on their identification document, there is an increase in the customer risk factor due to the difficulty in properly identifying the individual. When required to apply standard CDD obligations and this situation arises, subject persons should collect all the standard identification details excluding the name/surname since it would not be available. Subject persons should then compensate for the inability to obtain the name/surname and the resulting risks by applying other mitigating measures that would give more reassurance about the genuineness of the customer's identity.

**When dealing with mononymous persons, subject persons are to consider applying one or more of the additional verification measures. These measures include the collection of any documents listed in Section 4.3.1.1(i) of the Implementing Procedures Part I, namely "Standard Verification Requirements - Verification of identity".**



**Example:**

If the passport bearing one name has already been collected, any other government issued documents containing photographic evidence of identity may be collected to confirm the individual's details. These may include:

- A valid unexpired national or other governmental-issued identity card
- A valid unexpired residence card
- A valid unexpired driving licence

The collection of this documentation may be carried out to confirm that the individual is really who they purport to be. Caution should always be exercised as to the authenticity and veracity of any identification documents provided.

When the identification detail is not available, such as in the case of mononymous individuals, the collection of further documentation for the verification of identity would help mitigate the risks, and offer more reassurance that the details provided and made available are correct and true.

**This is a practical example of how to implement the risk-based approach: to mitigate the customer's ML/FT risk due to insufficient identification details by increasing the mitigating measures relating to the customer's identification.**

**In this manner, the subject person's resources are applied where most needed, i.e., where the subject person determines that there is a higher than normal risk of ML/FT.**



## Procedure to follow when reporting mononymous natural persons on the Centralised Bank Account Register (CBAR) and on the goAML platform.

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To date, CBAR validation rule L3.8 prohibits reporting entities from making one-word entries into the 'NameSurname' field. Similarly, goAML's schema mandates that both 'Name' and 'Surname' fields within the 't\_person' node have to be filled.

In light of the limitations highlighted above, a standard approach has been agreed upon for the purposes of reporting to the CBAR and the goAML platforms respectively.

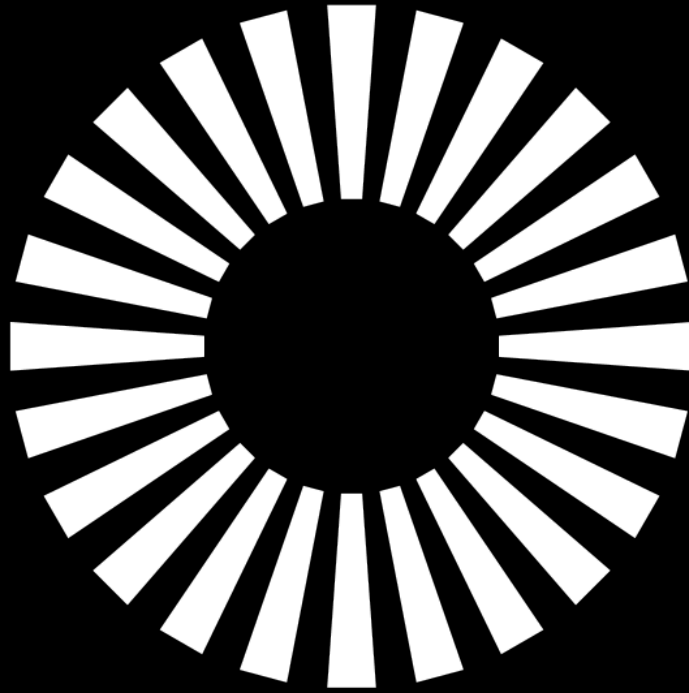
To this extent, when reporting to CBAR or goAML, subject persons are now required to report mononymous natural persons using a 'No Name' or 'No Surname' substitute as required. When it is not specified on the identification document as to whether it is the name or the surname that is missing, reporting subject persons may assume that the name provided is a first name and, therefore, can report accordingly with the 'No Surname' substitute.





For further clarity on the matter, please find a table below summarizing no name/surname workarounds factoring in both CBAR and goAML reporting schemas:

Scenario	Example	CBAR (NaturalPerson element)	goAML (t_person)	
		NameSurname	Name	Surname
When identification document specifies name only	John	"John No Surname"	"John"	"No Surname"
When identification document specifies surname only	Smith	"No Name Smith"	"No Name"	"Smith"
When it is not specified on the identification document as to whether it is the name or the surname that is missing	Barbara	"Barbara No Surname"	"Barbara"	"No Surname"



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