

GUIDELINES FOR THE USE OF THE ONLINE REPORTING OF DISCLOSURES TO THE GUERNSEY FINANCIAL INVESTIGATION UNIT

The Guernsey Financial Investigation Unit ('FIU') has implemented a new computer system (THEMIS) which includes the ability for the Financial Intelligence Service ('FIS') to receive Disclosures of suspicion (Also known as Suspicious Transaction Reports (STRs) or Suspicious Activity Reports (SARs) via an electronic web based secure portal.

THEMIS allows for an online interface between the Money Laundering Reporting Officer (MLRO) and the FIS, allowing a MLRO to submit a disclosure via the portal rather than submitting it in a paper format. The submission of the Disclosure via the portal is now the preferred method for receipt by the FIS as prescribed under the Disclosure (Bailiwick of Guernsey) Law, 2007 ('the Law'). It is therefore a platform to allow MLRO's to comply with their legislative obligations that includes compliance with Section 2 of the Law.

The system has been designed around the previous paper format of a disclosure submission; it is easy to use and is a more effective method of reporting. The system will also include on-line access to other links and will also be used as a secure method of a distribution of any future Financial Liaison Notices (FLNs) from the FIS to the MLRO.

The following document has been produced in order to assist you in the use of this system and all its functions, including the submission of a Disclosure of suspicion of money laundering 'STR/ SAR' and the receipt of Financial Liaison Notices from the FIS.

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1. OBTAINING A USERNAME AND PASSWORD

In order to provide you with access to the Themis system you will need to send registration details by e-mail to <u>FIU@gba.gov.gg</u> The registration form is available on the FIU website <u>www.guernseyfiu.gov.gg</u>.

Please list all the company/entities that you act as MLRO for, and list any other MLRO's / Deputy MLRO's or nominated officers from your company, if they also require access to the system, and the entities that they are responsible for.

Alternatively you can contact the Financial Investigation Unit directly on 714081 and request to speak with a member of the Themis Helpdesk. Full details on how to contact the FIS can be found on the FIS website www.guernseyfiu.gov.gg and follow the link for 'Online reporting of Suspicion Facility: Login / Information as to how to register'.

The contact details form will need to be authorised by your organisations Director or equivalent officer and returned to the FIS before you can be issued with login details.

The FIU will then supply your username and temporary password details in two separate emails. In order to maintain the security of the Themis system you are required to change this password* on your initial login session.

* A Password must contain at least 8 characters and contain both letters and numbers. It cannot be a repeat of any of your most recent 5 passwords

2. BEFORE YOU START - PLEASE NOTE:

- As THEMIS is a web based system you will need to ensure that your network and browser settings, particularly for security and firewall, will allow THEMIS to operate. In most cases there is not a problem but if you have any questions on the settings required please contact our IT support staff on (01481) 717007.
- THEMIS operates using some pop-up screens so your browser settings will need to allow pop-ups.
- Only ever exit a screen by clicking on the 'EXIT' buttons. Do not use the top right hand corner of your browser session as you will not be able to log back on for some time.
- When using THEMIS it is advisable to have at least 2 sessions open this can be useful to copy & paste information between screens but also keeps your session open should you accidently close a screen using the
- All MLROs / nominated officers registered to a disclosing institution will be able to access
 each other's disclosures. When any correspondence from the FIS is opened and marked as
 read by one MLRO it will be registered by the system as read by all MLROs.
- If, when logged onto the system, you have not performed any actions within a set period (121 minutes) the system will automatically log you out and any unsaved work will be lost.
- Navigating within the site between tabs and buttons constitute actions; however editing text does not. It is advised to use the save facility regularly.

3. HOW TO LOG INTO THE SYSTEM AND CHANGE YOUR PASSWORD

Open your web browser and type "https://mlro.gov.gg" into the address bar. The Themis system supports all the main web browsers including Safari, MS Internet Explorer and Mozilla Firefox.

Alternatively visit our website <u>www.guernseyfiu.gov.gg</u> and navigate via the 'Online Reporting of Suspicion Facility: Login' section to the portal address.

Enter the username and password supplied, this will provide you with access into the Themis system's MLRO portal.

If you act as MLRO for more than one entity you will be prompted from a screen entitled 'Choose FSB' to select, from a list, which one you are submitting the STR on behalf of. Once selected, the system will take you to the Home page of the specified entity. It is important to select the right entity to disclose under at this point as you will not be able to change it later on in the process.

4. SYSTEM NAVIGATION & FUNCTIONALITY

Once you have successfully logged on to the portal your Home page will appear.

The Themis MLRO Portal is navigated by a series of 6 tabs – 'Home', 'Disclosure Reports', 'Financial Liaison Notices', 'Guidance & Legislation', 'Notice Board', 'Change Password' and 'Exit'. Each Tab provides access to the different areas of the Themis system that you will require.



Home Tab:

This is where all of your current work/notices will be displayed. This will include current Disclosure Reports, current Consent/Non Consent issues and current Financial Liaison Notices.

Disclosure ReportsTab:

This is where you can search for any existing Disclosure Reports that you have submitted, create new Disclosure Reports and archive/un archive previous Disclosure Reports. Disclosure Reports with a status of 'Pending' can also be viewed under this section.

Financial Liaison NoticesTab:

This is where you can search for any existing FLN's or archive/un archive previous FLN's.

Guidance & Legislation Tab:

This is where you can search for/view any uploaded Guidance/legislation documents.

Notice Board Tab:

This is where you can search for/view any messages sent from the FIS.

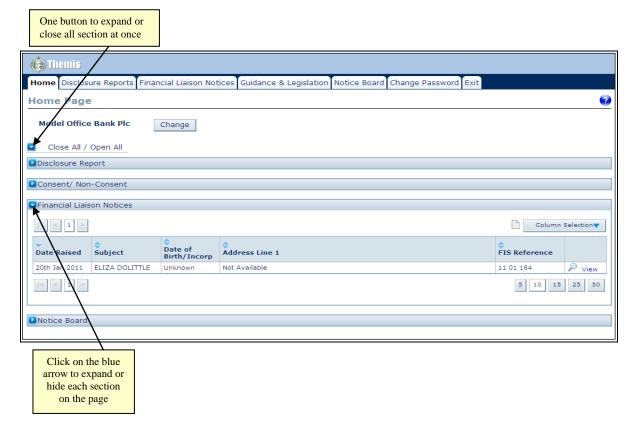
Change Password Tab:

This is where you can change your current password.

i. Home Tab

This is the default screen that you will see upon logging onto the system.

The Homepage is divided into four sections displaying your current work/notices. They will show Disclosure Reports, Consent/Non Consent issues and Financial Liaison Notices & Notices



Disclosure Report: This area lists all the Disclosures for the represented organisation that meet the following criteria:

- The disclosure has a status of Pending and has not been archived.
- ◆ The disclosure has been submitted to the FIS and has a communication from FIS that has not been read yet by the FSB.
- The disclosure has been created by FIS on behalf of the organisation.

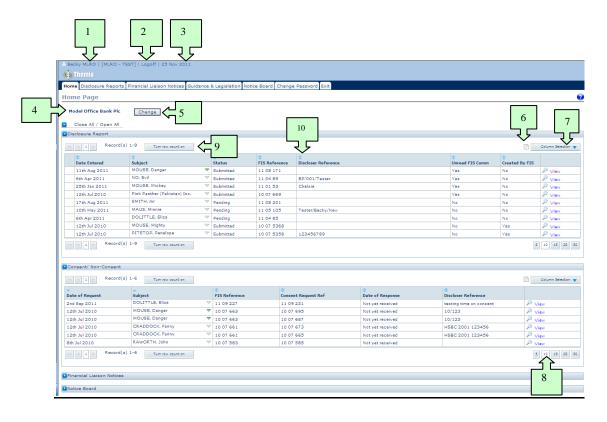
Consent/Non-Consent: This area lists all Consent Requests that have been submitted to the FIS and meet the following criteria;

- ♦ The consent request has not yet received a response from the FIS.
- ◆ A response has been received which has not been read by a MLRO on behalf of the FSB.

Financial Liaison Notices: This area lists all Financial Liaison Notices that have not been marked as read by the current user.

Notice Board: This area lists all Notices that have not been marked as read by the viewing user.

General Functionality of Home Tab:



- Name of the MLRO logged in.
- ² → Logoff Button
- 3 ⇒ Date
- 4 Disclosing Institution you are logged in under
- Change button to enable you to select a different organisation for which you are MLRO or nominated officer
- Export Icon allows the results being displayed in that part of the screen to be exported and into an Excel spreadsheet outside of Themis.
- Column Selection Button allows you to select which columns you would like to include on the screen.
- 8 Number of records displayed on the screen. Defaults to 10 records.
- Row count of the total number of records in that section of the screen can be switched on or off.
- Filters are available to sort each column. Click on the blue \Leftrightarrow sorting icons of the required column to rearrange your results.

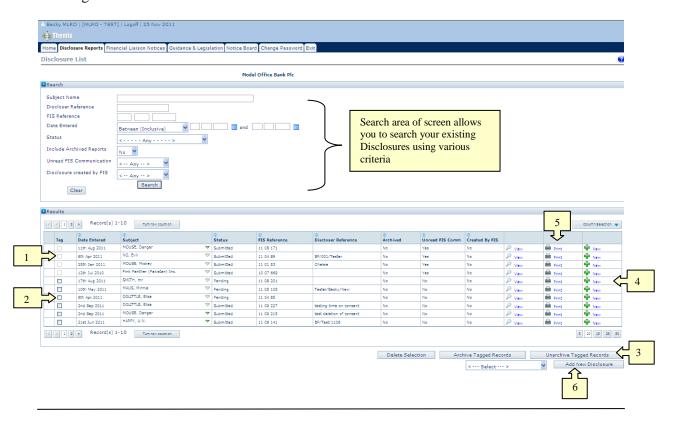
ii. <u>Disclosure Report Tab:</u>

This Tab allows you to search for all your disclosures from the top section of the screen and the bottom half of the screen shows the results. The default settings show the first 10 of all the unarchived disclosures relating to the entity you are logged in under.

To find out the total number of disclosures, click on the 'turn row count on' button.

To display more than 10 records click on icons in the right hand corner of the results screen.





- Records that have unread correspondence on cannot be tagged and archived until that correspondence has been read.
- Archiving Results Click on the 'Tag' boxes- this will tick them, then click on 'Archive Tagged Records'. More than one can be ticked at a time.

It is possible to archive Disclosures in order to reduce the number of results showing on the screen. Archived Disclosures are not initially visible, it is necessary to modify the Search Criteria to include Archived Reports to view Disclosures which have been archived.

- 3 → To un-archive one or more notices;
 - Search for all disclosure with 'yes' selected in the 'Include Archived Reports' field
 - Select the checkbox(es) next to the Disclosure9S) to Un-archive
 - Click Un-archive Tagged Records'.

NB: When a user archives or un-archives a notice it will become archived or un-archived for all users of the currently represented organisation, regardless of whether they have read it or not.

'New' button allows you to copy an existing disclosure so avoiding the need to rekey in all the information in the original. It must not be used to update an existing disclosure.

- 5 Print Button allows you to print a copy of your disclosure.
- 'Add New Disclosure' button. Click this to add a new disclosure. It must not be used to update an existing disclosure. Before adding a new disclosure you will need to select a category for the main / primary subject of the disclosure from the < ---Select--- > field.

iii. Remaining Tabs:

The Financial Liaison Notice, Guidence & Legislation, Notice Board and Change Password Tabs all contain similar general functionality and operate in the same way as the Home & Disclosure Record Tabs.

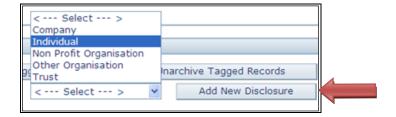
5. CREATING & SUBMITTING A DISCLOSURE

Click on 'Disclosure Reports' tab

a. Adding the Primary / Main Subject

Use the drop down in the bottom right hand corner of the screen to select the **Primary Subject** of your disclosure. Choose from; 'company', 'individual', 'Non-profit organisation' or 'other organisation' and then select 'add new disclosure'.

NOTE: Should you wish to disclose on two parties (joint account / partnership) you will need to select one of the parties at this stage. The second party can be added to the disclosure later in the process.



The system will navigate to the 'New Disclosure' screen. This is a screen to put as much detail as possible on the Primary Subject of the disclosure.

Enter as much information that is available to you, in as much detail as possible. Any input boxes that are highlighted in yellow are mandatory fields and must be completed before the Disclosure Report can be submitted.

The green plus icons below an input field indicates that additional information fields can be created e.g. secondary address, telephone numbers, email addresses etc.

In order to populate the Nationality section you will need to select a country from the dropdown list. Press the green plus icon to add the selected country. A second country (dual nationality) can be selected by repeating the process.

The Further Information input box can be utilised to include any additional details on the primary subject that is not covered by the standard questions. **Do not include grounds for suspicion, consent requests and additional information here** – that comes later in the process.

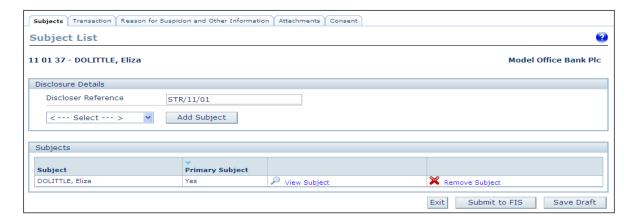
b. Creating a Disclosure

When all available information has been entered for the primary subject, scroll to the bottom of the screen and click the 'Create Disclosure Report' button in the bottom right hand corner. The

system will then allocate the disclosure a unique reference number and will also save the information as a draft. This draft will now be available to be viewed by other MLRO's from your organisation should this be required.

Scroll down to the bottom of this page and select 'Exit'. The system will then navigate you to the main disclosure section.

The screen below then appears with 5 tabs available to complete as required. Complete all of the <u>relevant</u> tabs that are applicable to your Disclosure Report, tabs that are not relevant should be left blank.



c. Subjects Tab

The Subjects tab is used to include additional subjects to the disclosure. Subjects are divided into five types; one individual subject type and four organisational subject types. The type of subject will determine the fields available for completion. One disclosure can contain multiple subjects of different types.

Select any additional subject types and (Company, Individual etc.) and click add subject – the system will navigate you to a secondary subject screen where all possible details should be entered. Once this has been completed click 'Save' before exiting.

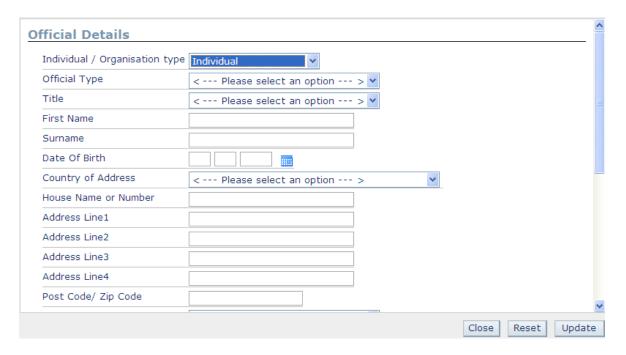
Adding Officials of Organisations:

When one of the subjects of a disclosure is an organisation (Company, Trust, Non-profit Organisation or Other) there is facility for adding the officials for that organisation e.g. Directors, Beneficiaries etc.

Each organisation details screen contains a section called 'Other details' and within that section 'Add Official(s)'.



From the above screen Click on 'Edit Details' to add an official and the following scrolling pop-up screen displays:-



Use the dropdowns provided to describe the details of the official you are disclosing in as much detail as possible.

If you have already put the official's details in elsewhere in the system then just complete the first 6 lines.

If you add an address you will need to enter an address type too.

When complete click 'Update'- any errors or other required information will be displayed for you to amend.

To exit the completed 'Official Details' screen click on close which will return you to the 'Organisation' details screen where you can add further officials by clicking on the icon and repeating the process.

Once you have added all officials click 'Save' and 'Exit' to return to the Subject list of the disclosure.

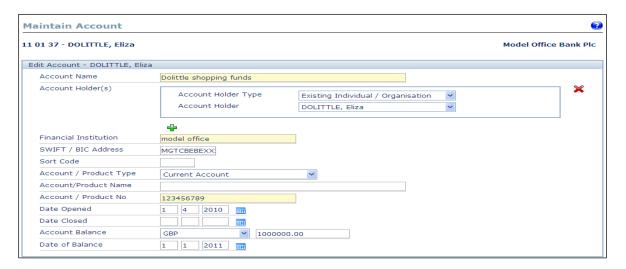
d. Transaction Tab

Under the Transaction tab information regarding accounts, individual transactions and transactional parties can be added to the disclosure.

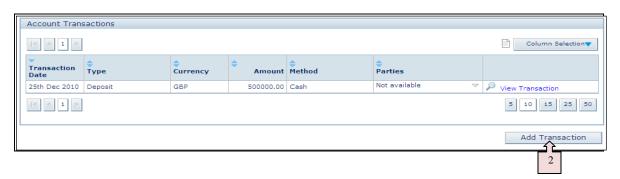


Select the Add Account button at the bottom of the screen. This will navigate you to the Maintain accounts screen where account details that are known can be populated. As with other

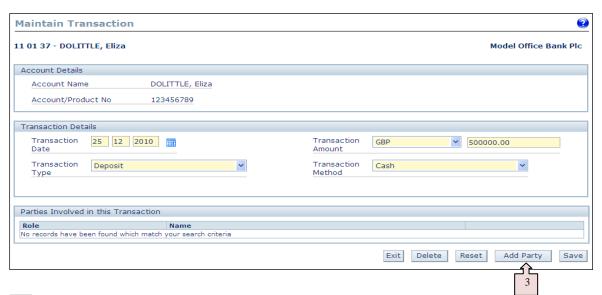
areas of the system the fields in yellow are mandatory. Ensure that you click 'Save' in order to save this information.



Once account details have been saved an additional input box will appear where the details of specific transactions can be added.



In order to add transactions to the system click the 'Add Transaction' button. This will open the Maintain Transaction page, all input boxes in this section are mandatory. Click Save once completed.

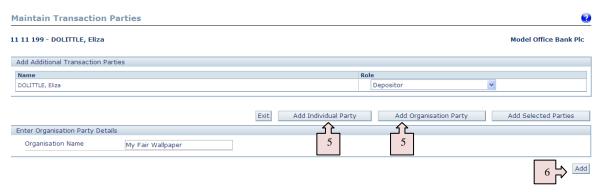


In order to add a 'Party' to the transaction click on the 'Add Party' button on the Maintain Transaction page. This will navigate you to the Maintain Transaction Party screen.

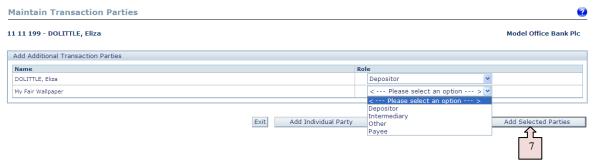


This screen allows you to select any subject already included on the disclosure e.g. Eliza Dolittle and assign a Role e.g. 'Depositor' from the dropdown list.

Alternatively you can add a completely new Individual or Organisation Party using the buttons provided.



Once the organisation or individual party has been entered click 'Add'. The new party will be added to the list of transaction parties where you can assign a role to it



Further parties can then be added by selecting one if required

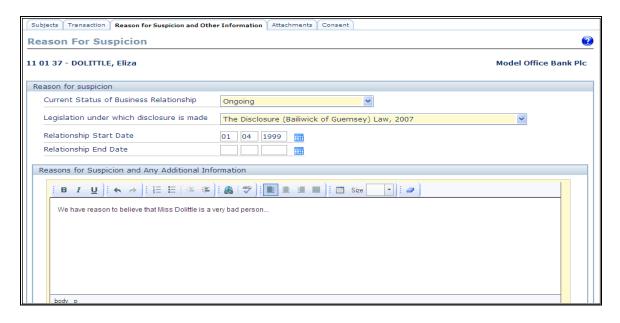
Click on Add Selected Parties to complete this process. Click Exit to return to the Maintain Transaction screen where further transactions could be added.

Click Exit to return to the main Disclosure screen.

You will not be able to add further transactions once the disclosure is submitted.

e. Reason for suspicion and other information Tab

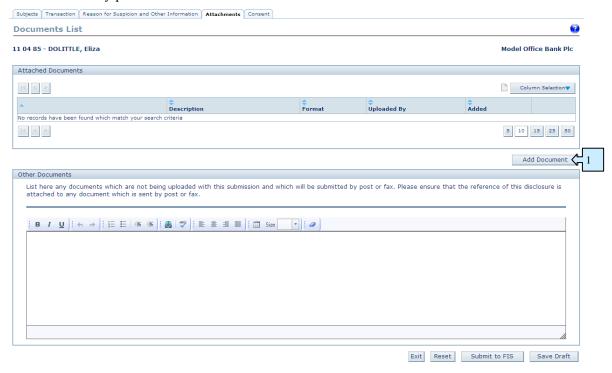
This tab is used to record the details of your suspicions and the reason(s) for making the disclosure to the FIS. This screen is only editable before the disclosure has been submitted to the FIS. Once the disclosure has been submitted this information will be read only.



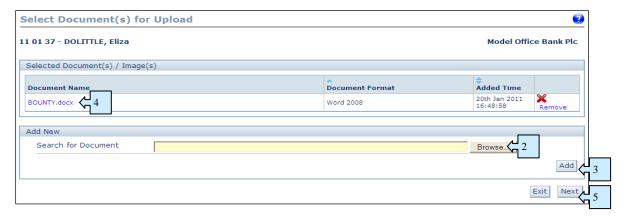
The following fields are available for completion; Current Status of Business Relationship, Legislation under which Disclosure is made, Relationship Start Date, Relationship End Date (if appropriate), Reason for Suspicion and Any Additional Information. As per other sections of the system, fields highlighted in yellow are mandatory.

f. Attachments Tab

The attachments tab is where you can upload and supporting documentation electronically in support of your disclosure. It also allows you to notify the FIS of any other documents you may wish to submit by post or fax in the 'Other Documents' Text box



In order to attach a new document select the Add Documents button where you will be navigated to the Select Document(s) for upload screen. This screen will allow you to click on the Browse button to select a document from your computer or network.



Once a file has been selected the Search for Document path will be populated.

Click the Add button to upload the file. 43

The screen will reload and the uploaded document will be listed at the top of the screen. $\overset{1}{\varsigma_1}$

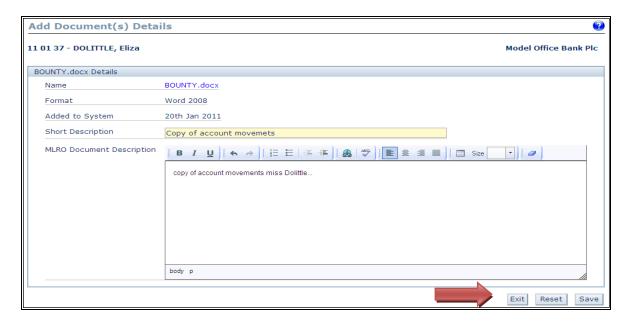
Multiple documents can be uploaded on this screen by repeatedly browsing for a file and clicking the Add button.

Uploading a zip file will extract the individual files and list them at the top of the screen.

Once all the required documents have been selected click the Next button at the bottom of the screen. $\leftarrow 5$

The Add Document(s) details screen will load; a set of fields will be displayed for each document uploaded on the previous screen. Each document has a Short Description and scrolling free text field to enter details about the document. The Short Description field is mandatory for all uploaded documents.

Click the Save button to save any changes that you have made. The Edit Document Details screen will close and Attached Documents screen will be redisplayed.

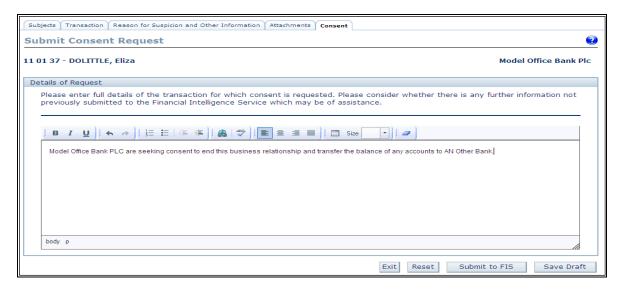


g. Consent Request Tab

Should you wish to request consent from the FIS the details of this request should be provided under this tab.

Before the disclosure is submitted to FIS the Consent tab contains a single scrolling text box. In order to submit your Consent Request along with the disclosure enter the details of the request in the text box.

Click the 'Save Draft' button.

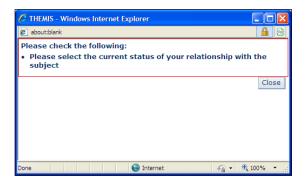


h. Submitting the Disclosure to the FIS

Click on the Submit to FIS Button (which can be found at the bottom of each tab).

The system will check that all the required details have been entered correctly and all the mandatory fields within the disclosure have been completed.

Any validation error(s) will be shown as an error message at the top of the screen to inform you of the issue(s). An additional popup window will appear listing the validation error(s); this is to assist you by providing a list of the issue(s) that require attention.



It will be necessary to re-visit the relevant tab and either correct or add any information that the validation message refers you to. **Ensure** that you save the new/corrected information on each tab before submitting the disclosure.

If there are no validation errors the data entered will be saved and a message will appear asking for confirmation to submit the disclosure to FIS.



Click No to continue editing the disclosure or click Yes to submit the disclosure to FIS.



Once the disclosure has been submitted the above Consent Request screen of the disclosure will be displayed with a confirmation message. You will also receive an automated email direct into your mailbox to confirm that your request has been received by the FIS.

Please note that this is an acknowledgment only of the receipt of the disclosure and not consent for you to undertake the transaction.

When the FIS respond to your request for consent you will be notified by direct email advising that a response is available on the system.

Should your consent request be time critical and you have not received any response within two days please contact the FIS quoting the Themis disclosure reference number whereupon priority can be placed upon your request to be dealt with as soon as practical.

To return to the main Disclosure Tab click 'Exit'

i. Updating an Existing Disclosure / Subsequent Consent Requests

Once a disclosure has been submitted it can be accessed again to request consent, view FIS Communications, and add further information and documents. The Subjects, Transaction and Reason for Suspicion and Other Information Tabs cannot be edited after submission.

To update an existing disclosure locate it by searching for it on the Disclosure Report Tab. When you have found the correct Disclosure, click view next to it and the following screen displays:-



You will notice that 2 extra tabs are now showing than before the original submission.

FIS communications: shows any letters / correspondence relating to the disclosure that the FIS has sent to the disclosing institution.

Further information: any extra / further information that you wish to add to the original disclosure can be added here

IT IS ESSENTIAL THAT DISCLOSURES ARE UPDATED IN THIS WAYAND NEW ONES ARE NOT CREATED INSTEAD AS THIS CAUSES DUPLICATION WITHIN THE SYSTEM.

6. FINANCIAL LIAISON NOTICES

Financial Liaison Notices (FLN) distributed by the FIS to your organisation will be listed on the Financial Liaison Notices Tab.

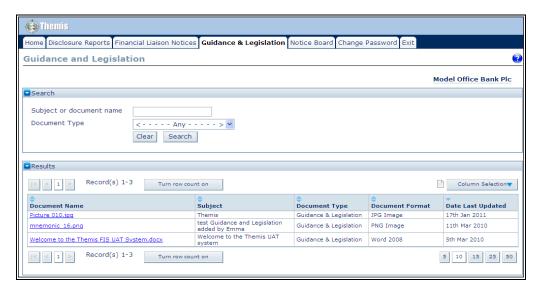
Note: Any Financial Liaison Notices which were distributed prior to you beginning to represent the organisation will not appear in your Financial Liaison Notices list.

The system will inform you by email notification that a new FLN has been issued by the FIS direct to your email contact address.

FLN results can be searched, sorted and archived / un-archived as required.

7. GUIDANCE AND LEGISLATION

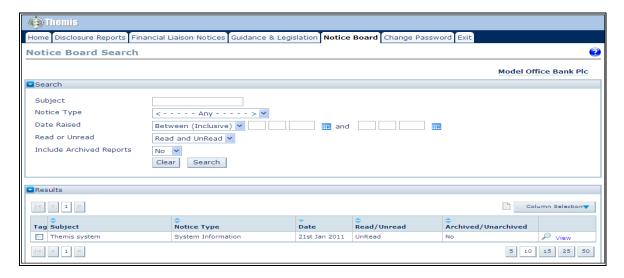
The Guidance and Legislation Tab will contain documentation and information for use by the users of the MLRO Portal. This information will be posted to the system by the FIS and you will receive an email notification when new Guidance and Legislation is available.



In order to view any of these documents simply click on the document name and this will give you the option to open or save the document.

8. NOTICE BOARD

The Notice Board will contain notices submitted by the FIS for the information of users of the MLRO portal. A Notice may contain general information for all users or information specific to your organisation.



When a new Notice is distributed by the FIS to your organisation, all MLRO portal users currently representing your organisation will receive email notification advising that a notice has been posted for your attention.

9. CHANGE PASSWORD

Enter your current password

Enter and repeat your new password. Your new password must contain a minimum of 8 characters, containing both letters and numbers and must not be the same as any of your 5 most recent passwords.

Click on 'Save' to save the new password (or 'reset' if you wish to re-enter the details)

10. LOGGING OFF

To log off from the system select either the 'Log off' button next to your username or the 'exit' button on any screen with a blue banner.

