



Financial Investigation Unit
Cross Border Crime

A Division of the Guernsey Border Agency

Reporting to the FIS Using THEMIS

May 2014

Topics for Discussion

- Contacting the FIS
- Registering for THEMIS / Informing the FIS of changes
- Guidance
- FIS Notices
- Logging In
- Updating pre-THEMIS SARs (paper copies)
- Completing a 'quality' SAR
- THEMIS – what to do if you encounter a problem
- THEMIS FAQs



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Communicating with the FIS

Contact the FIS by email :-

- For a Password Reset;
- To inform the FIS of Contact Detail changes;
- To register a new organisation;
- To request that users are added to/removed from an organisation;

Email the FIS at FIU@gba.gov.gg



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Communicating with the FIS

For urgent requests, or to speak to an Investigator, please telephone the FIS on (01481) 714081

If your enquiry is regarding a submitted Suspicious Activity Report (SAR), please provide the DL reference number that was given when you first submitted the SAR through THEMIS.

If you have already contacted the FIS regarding the SAR, it is helpful if you can provide the name of the Investigator that you have previously spoken to.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Registering on THEMIS/ Informing the FIS of changes

To inform the FIS of any changes required, or to register a new organisation on THEMIS, please email the FIS at FIU@gba.gov.gg

You will receive a copy of the THEMIS registration form. This is used both for initial registration and to notify the FIS of any subsequent changes to details held by the FIS.

We will only action any requests upon the receipt of a completed and signed Registration Form.

Please give ample notice of any changes required (2 weeks if possible). We will aim to action your request within 10 working days.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Registering on THEMIS

When completing a registration form, please complete one form per organisation.

Please include the details of all persons who require access to report for that organisation, **including any existing users** who wish to retain their access.

Any current users whose details are not listed on the form will have their access removed for that organisation.

For security reasons, please provide individual email addresses rather than generic team inboxes.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

THEMIS Guidance

THEMIS access allows you to:

- submit SARs;
- read notices issued by the FIS;
- read guidance issued by the FIS.

Guidance on how to use THEMIS is provided on the Guernsey FIU website www.guernseyfiu.gov.gg

This can be found in the FIS section of the website > Reporting of Suspicion Guidelines > 'MLRO Distance Learning Package' (this is a document available to download at the bottom of the page).



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

THEMIS Guidance

The FIS have produced a THEMIS FAQ document, which aims to address common problems that THEMIS users experience.

If after consulting the MLRO Distance Learning Package and the THEMIS FAQ document you still have a query, please contact the FIS.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

FIS Notices

The FIS issues notices to THEMIS users on a variety of topics, including:-

- Legislation;
- Guidance;
- THEMIS maintenance warnings;
- Sanctions;
- Fraud warnings;
- Upcoming seminars/training/presentations;
- Financial Liaison Notices (FLNs); and
- Any other information which the FIS considers may be of interest



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

FIS Notices

Notices are sometimes sent only to 'targeted' distribution groups, dependent on GFSC license category.

If you receive a 'targeted' notice, checks can be carried out against any other organisations that you are registered to report for, even if they have not been the target recipient of the notice.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

FIS Notices

Whilst logged into THEMIS, you are able to view notices previously issued by the FIS during the time that you have been registered for that organisation.

If your reporting access for that organisation has been removed at any time, you will only be able to see notices issued since your access was last reinstated.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Logging into THEMIS

If you require a username reminder or a password reset, please email the FIS at FIU@gba.gov.gg

Upon first registration for THEMIS you will receive a username. This is your **PERMANENT USERNAME AND WILL NOT CHANGE** (unless you are advised by the FIS).

Please note that if you take up an appointment for another organisation, your username will remain the same.

It is helpful if you can provide us with your username when you previously had access.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Logging into THEMIS

You should only ever have one username which is valid for **all Organisations you are registered to report for.**

You can select which Organisation that you wish to report for once you are logged into THEMIS, and the Organisations you can report for can be amended by the FIS when required.

For further guidance on logging into THEMIS, please refer to the THEMIS FAQ document.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

THEMIS Passwords

You will receive a temporary password by email.

The password will only be sent to the email address that we have registered for you.

If your email address has changed, please inform the FIS by email.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

THEMIS Passwords

Upon receiving your temporary password, please log on to THEMIS.

You will be requested to change the password to something that you choose. Once you have entered your new chosen password, please click 'SAVE'.

Your password is valid for 3 months.

You have 3 attempts to log in before your account becomes suspended and you will require a password reset.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Pre-THEMIS SARs

If you have previously submitted a SAR in paper format, and wish to provide an update or request Consent, please do so via THEMIS.

Submit a new SAR. Please include the previous FIS reference number i.e. DL/08/xx in the Reasons for Suspicion tab.

Subsequent updates/requests should be submitted from the new SAR, and the new DL reference should be quoted if you need to contact the FIS.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Reporting – Getting Started

If you are completing a SAR on THEMIS and are unsure what to do, please refer to the MLRO Distance Learning Package and the THEMIS FAQ documents before contacting the FIS.

These documents also provide more detailed explanations of the required details when completing a SAR.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content – Subjects

When completing a SAR on THEMIS:

- Any subjects that are involved in the suspicion should be entered as subjects in the 'SUBJECTS' tab.
- Any persons/companies etc. that are associated (but do not form part of the suspicion) should be included in the text of the 'Reason for Suspicion' tab

Example:

If Mr A and Mr B are laundering together, they will both need to be created in the Subjects tab.

However,

If Mr A is laundering, and Mr B is an associate of Mr A (but not involved in the laundering = no suspicion), Mr B should only be referenced in the Grounds for Suspicion tab.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content - Subjects

Please include all known details and list **each subject who forms the suspicion** as an individual subject (person, trust, company etc.) in the **Subjects tab**.

Other **subjects who do not form part of the suspicion**, but who are mentioned in the SAR can be referenced in the **Reasons for Suspicion tab only**.

Please include all known details in the Subject card in the relevant fields, and not in the 'Further Information About This Subject' box.

Once the initial subject details are complete, click 'SAVE', then 'EXIT' to return to the DL and complete the other tabs.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Reporting - Suspicion

The reason for the **MLROs** suspicion, (not the person who has informed the MLRO) should be outlined, and submitted along with any supporting documentation.

The GFSC Handbook provides further information on this.

A copy of an Internal Report as the MLROs reason for suspicion is NOT adequate (but can be attached as a document if required).



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content – Reason for Suspicion

Include an initial overview statement including:

- what you believe the criminality/ies to be*;
- and
- a brief outline of your reasons for suspicion

Please be clear and concise.

*e.g. Attempted Transaction, Organised Crime Group, Fraud, Tax Evasion, Money Laundering etc. You can include multiple criminalities if applicable.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content – Reason for Suspicion

Please try to answer the following questions in the SAR Reason for Suspicion tab: -

- Who?
- What?
- Where?
- When?
- Why?
- How?



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content – Reason for Suspicion

Within the Reason for Suspicion text, please include:

- The nature of your relationship with the subject;
- The relationship start date;
- Details of what your suspicion is;
- Assets involved, including, where applicable:
 - the type/nature of asset(s) (i.e. account type),
 - trust type and asset(s),
 - who has control of the asset(s),
 - values of the asset(s) etc.

If the relationship is complicated, it is helpful to attach explanatory structure charts to the SAR.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR content – Reason for Suspicion

Please refer to all subjects by their full names, not initials throughout your report
i.e. Joe Paul SMITH (surname in capital letters).

For companies, trusts etc., please use capitals
i.e. FINANCIAL INVESTIGATION UNIT.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content – Reason for Suspicion

If any open source information, or other information is referred to, please attach electronic copies of the documents to the SAR in the Attachments tab.

DO NOT INCLUDE HYPERLINKS WITHIN THE TEXT.

PLEASE NOTE THAT UPLOADED DOCUMENTS CANNOT BE REMOVED BY THE REPORTING OFFICER ONCE SUBMITTED. Please contact the FIS if you have attached a document to a SAR in error.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR content – Things to Remember

Accounts tab

Please include details of any accounts relevant to the SAR in the 'ACCOUNTS/TRANSACTIONS' tab.

Values of Assets

If there are asset(s) relevant to the SAR, such as a Pension Fund, Trust etc., include details about the nature, value and currency.

This is particularly important if you are seeking Consent.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR Content- Consent

If you are submitting a Consent Request, please ensure that you have covered all relevant details as outlined previously, and specify the following :-

- What you intend to do with the relationship; and
- What you are looking for Consent to do.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

SAR content – Before submission to the FIS

Please check for any spelling errors.

Please check that the subject names are spelt correctly and consistently throughout the SAR. (Any alias names can be included on the subject card).

Ensure that all relevant documents are attached.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

FIS Reference Numbers

When you submit a new SAR, you will receive a DL (Disclosure) reference number. Please quote this number in any correspondence with the FIS regarding the submission.

Each SAR has its own unique 'DL' reference number. This reference number will not change.

Please only quote the DL reference number in any correspondence with the FIS.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

Adding Additional Information/ Subsequent Consent Requests

ADDITIONAL INFORMATION and CONSENT requests DO NOT REQUIRE a 'New' SAR.

If you have attached additional documents, please provide an overview in the 'Further Information' tab and click 'Submit'.

For instructions on how to update existing SARs, or request Consent, please refer to the MLRO Distance Learning Package or the THEMIS FAQ document.



Financial Investigation Unit
Cross Border Crime
A Division of the Guernsey Border Agency

THEMIS Problems

If you encounter a problem whilst using THEMIS:-

- Take a screen shot, and send this, along with the time and date the error occurred and an explanation of what you were doing at the time to the FIS by email.
- If you continue to experience problems after this, please call the FIS for assistance.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS Problems

If you receive a 'processing error', and the screen freezes whilst processing, you may have to exit out of the window using the 'X'.

If you have difficulty re-entering THEMIS after this error has occurred, please contact the FIS.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS Tips

If you are intending to enter a lot of text into the system, it is advised that you type the text into a Word document, and copy this into THEMIS.

If you do this, please check the formatting of the copied text before submission.

It is advised to save your work regularly when using THEMIS.

Please be aware that unless you save regularly, your session will time out after 120 minutes, and any unsaved work will be lost.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS FAQ's

Q: I want to register my organisation / new users on THEMIS. How do I do this?

A: Email the FIS to request a Registration Form. Please complete the form as per the instructions provided on it, and return a signed copy to the FIS by email. We will then process your request.

If providing updates for an already registered organisation, remember to include details for all existing users who wish to retain their access.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS FAQ's

Q: I am unable to log in, although I know my log in details. Why?

A: There may be a few reasons why this is:

1. Your **account may be suspended**, either due to password expiry, or too many failed log in attempts. You will need a new password. If after a new password has been issued, and you have followed the steps below, you continue to experience problems, please contact the FIS.
2. Slow loading times may mean the system has not recognised your username. To avoid this, please wait a few moments after opening the log on page, before beginning typing in your details. **Always check that your username is displaying correctly before attempting to log in.**
3. Logging off incorrectly can cause future log in problems. **Always exit THEMIS using the 'Log Off' button** at the top of the page.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS FAQ's

Q: I have lost my reporting access for an organisation that I was registered to report for? Why has this happened?

A: If your access has been removed unexpectedly, this is probably due to **your details not having been included on an updated Registration Form that has been submitted to the FIS.**

We can reinstate your reporting access for that entity upon receipt of a Registration Form. Please note, you will not have access to any notices issued by the FIS prior to your access being reinstated.

To avoid this, please include details of **ALL** persons who will require reporting access for the organisation, including any existing users.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS FAQ's

Q: My organisation had submitted a SAR through THEMIS previously, but we now cannot find it in THEMIS. What has happened to it?

A: It is possible that the SAR has been archived.

To find it, on the 'Disclosure Reports' tab, enter the information that you know about the SAR into the search fields, and ensure that the option to 'include archived reports' is set to 'YES'. Click the search button to retrieve the results, and all relevant submitted SARs should be displayed.

You may need to amend the Row Count in order to display all results, or click through multiple pages, dependent on the number of results returned.

For instructions on how to 'Unarchive' a record, please see the THEMIS FAQ document. Please note that this will 'Unarchive' for all registered users for the organisation.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency

THEMIS FAQ's

Q: I have received an email about correspondence from the FIS and have logged in but I cannot find it. How can I view it?

A: Look in the **Financial Liaison Notices (FLN) tab**. If you cannot see it here, and you are registered to report for multiple organisations, return to the Home tab and ensure that the entity that the notice was sent to is selected. The notice should now be displayed in the FLN tab.

Unless otherwise stated, it is acceptable to conduct checks on the subjects listed in the FLN against other organisations that you are registered for.

Correspondence related to a submitted SAR can be seen by 'viewing' the submitted SAR, and clicking on the FIS Communications tab.



Financial Investigation Unit
Cross Border Crime
A Division of the Customs Border Agency



Financial Investigation Unit
Cross Border Crime

A Division of the Guernsey Border Agency

If you have an enquiry that is not covered
in the Guidance Packs available, please
contact the FIS.