Guidance Document
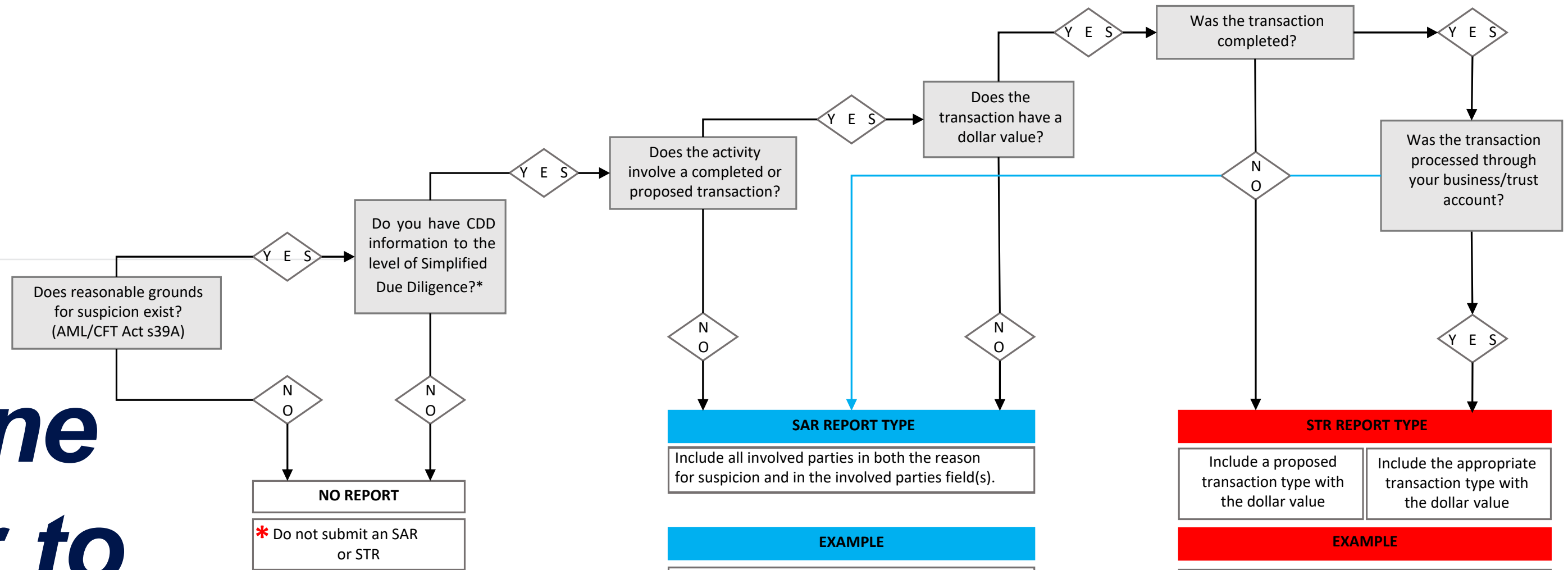
WEB REPORTING: SUSPICIOUS ACTIVITY REPORTS (SARs)

Financial Intelligence Unit
Version 2.5 | September 2021

NEW ZEALAND
POLICE
Ngā Pirihimana o Aotearoa

How to determine whether to use the SAR or STR Form

Does reasonable grounds for suspicion exist? (AML/CFT Act s39A)

— YES → Do you have CDD information to the level of Simplified Due Diligence?*

— NO → NO REPORT

* Do not submit an SAR or STR

Do you have CDD information to the level of Simplified Due Diligence?*
— NO → NO REPORT
— YES → Does the activity involve a completed or proposed transaction?

Does the activity involve a completed or proposed transaction?
— NO → SAR REPORT TYPE
— YES → Does the transaction have a dollar value?

Does the transaction have a dollar value?
— NO → SAR REPORT TYPE
— YES → Was the transaction completed?

Was the transaction completed?
— YES → STR REPORT TYPE
— NO → Was the transaction processed through your business/trust account?

Was the transaction processed through your business/trust account?
— YES → STR REPORT TYPE

* This should be used as a guide to determine whether the information you hold is sufficient to ensure all parties involved are captured in the report. If you hold less information than required for Simplified Due Diligence, but still have other information that could be used to identify involved parties please contact the FIU via the goAML message-board.

SAR REPORT TYPE

Include all involved parties in both the reason for suspicion and in the involved parties field(s).

EXAMPLE

An individual visits the office of a reporting entity and wants to deposit cash in to the account of a customer or client of the reporting entity.

The individual places a large bag on the counter, and tells the employee the bag contains the cash they want to deposit. The amount is not provided. The individual refuses to provide CDD information on request and the reporting entity does not accept the cash deposit.

Submit a SAR.

STR REPORT TYPE

Include a proposed transaction type with the dollar value | Include the appropriate transaction type with the dollar value

EXAMPLE

An individual visits the office of a reporting entity and wants to deposit $15,000 cash to the account of a customer or client of the reporting entity.

The employee notices the cash has a distinctive smell and is crumpled and dirty.

The individual provides CDD information upon request, and the reporting entity accepts the cash deposit.
Submit a STR with the appropriate transaction type

OR

The individual refuses to provide CDD information on request and the reporting entity does not accept the cash deposit.
Submit a STR with a proposed transaction type.

Interpreting this Document

Note you will need to use Chrome, Firefox, or Microsoft Edge as Explorer is no longer supported as a web browser.

This document contains screen-shots of the goAML system when completing a Suspicious Activity Report online.

Fields marked in red must be completed, as they are required by regulations and/or the goAML system.

Please include any other information that is available to you in applicable fields.

Additional guidance can be found in the resource library by clicking on the Help tab on the navy blue task bar.

General Rules

Following these "general rules" will assist reporting entities with efficiently and effectively submitting SARs

- If you hold relevant information, please provide it, regardless of the status of the field (i.e. mandatory vs optional).

- FIU staff are unable to make corrections to SARs that have been submitted. Any issues identified will be highlighted in a rejection message accompanying the returned SAR for you to make appropriate changes and resubmit.

- "Unknown" will generally not be accepted. As per legislation, Enhanced Customer Due Diligence (EDD) must be conducted in instances where a SAR is required to be submitted. EDD requires identity verification and identification of the 'source of wealth', so in normal circumstances "unknown" parties and/or accounts will not be accepted.

- Spaces, dashes and additional punctuation etc. should not be included in any field, regardless of usual format conventions. Exceptions can be made where punctuation is necessary to avoid ambiguity(e.g. a flat or apartment should be reported as 9/123 Sample Street).

- Do not abbreviate words, instead provide the full word (e.g. "Ltd" should be provided as "Limited").

- Recurring information, such as names and addresses must be reported consistently (i.e. with the exact same wording each time).

- The rules for particular fields apply across all four report types.

As this report type captures activities rather than transactions, the reporting of the parties involved does not require a role to be identified. However, the Reason for Suspicion needs to clearly outine what part each party contributes to the overall scenario

    1. **Click on New Reports**
    2. **Click on Web Reports**

1

2
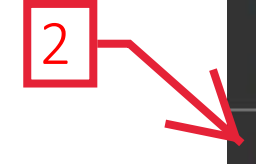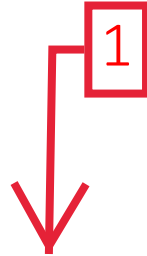
| NEW REPORTS ⌄ | DRAFTED REPORTS ⌄ | SUBMITTED REPORTS ⌄ | MY GOAML ⌄ | STATISTICS | ADMIN ⌄ | HELP | LOGOUT |

XML Upload

Web Reports

and Countering Financing of Terrorism (AML/CFT) Reporting
nce Testing (UAT) Environment

Welcome to the New Zealand Financial Intelligence Unit (FIU) online reporting facility for submission of Prescribed Transactions Reports (PTRs), Suspicious Activity Reports (STRs), and secure communication with the FIU.

This facility is available to all reporting entities as defined in Section 5 of the AML/CFT Act 2009, and Financial Institutions as defined in Section 3 of the Financial Transactions Reporting Act 1996.

Important note: Future releases may require goAML users to change their passwords every ninety (90) days. This is to help maintain system security and comply with the Protective Security Requirements (PSR). **Further information will be provided before this functionality is enabled.**

Before entering your report do you need a refresher
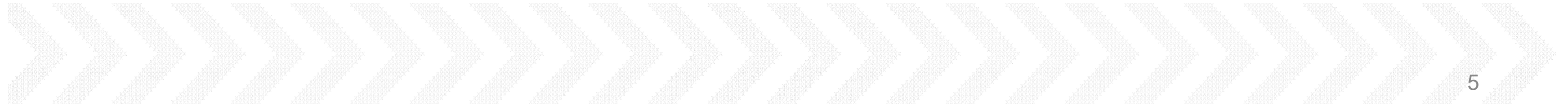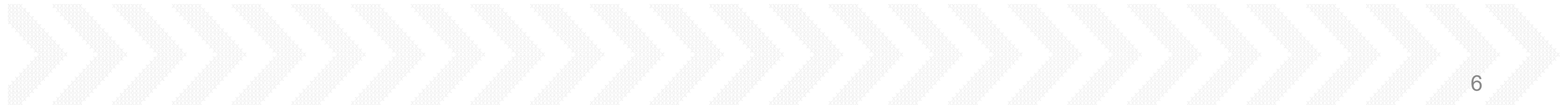
Reference numbers must be unique across all reports. We suggest using the name of the customer followed by the date.

Branch/Address where report is being submitted from.

At a minimum the reason for suspicion must include:
1. What happened – a detailed description of the activity (ies) that triggered your suspicion
2. What your suspicion is – A clear statement of the grounds on which your suspicion is held and
3. Why you hold the suspicion
4. Also needs to clearly outline what part each party involved contributed to the overall scenario

NEW REPORTS ▾   DRAFTED REPORTS ▾   SUBMITTED REPORTS ▾   MY GOAML ▾   STATISTICS   ADMIN ▾   HELP   LOGOUT

SAR: 757333-0-0

Attachments
Indicators
Activity

Suspicious Activity Report

Local Currency Code: NZD   Reporting Entity: Financial Intelligence Unit (FIU)   Entity ID: 1   Report ID: 757333-0-0

Reporting Entity Branch is required!   Reporting Entity Reference is required!   * Submission Date   FIU Reference
                                                                                                18/06/2021

Reason is required!

Action

⌄ Reporting Person   Load current user

Title   * First Name   * Last Name   Email

Gender   Birth Date   Nationality   Occupation
                               d/MM/yyyy

Passport Number   Passport Country

➕ DO NOT USE

To save your report click the 'Floppy Disc' Icon below.

Your selected indicators should be displayed here.

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NEW REPORTS ▾   DRAFTED REPORTS ▾   SUBMITTED REPORTS ▾   MY GOAML ▾   STATISTICS   ADMIN ▾   HELP   LOGOUT

SAR: 757333-0-0

Attachments

Indicators

Activity

1
Click on the 'Indicators' Tab.

2
To add an indicator, click on the box next to the relevant indicator(s). You must include:
i. Your Sector Supervisor (DIA, FMA, RBNZ) and
ii. All other indicators that apply to the activity within the report.

Indicators

You can search for and filter indicators in the search boxes below. For example if you have an activity where cash is involved, typing `cash' in the search box will filter indicators where `cash' is mentioned.

DIA ✖   CDD1 ✖

☐	Code ↑	Indicator
☐	Alerts	4 Alerts-FIU/Police Alerts or Requests for Information and intel related to goAML disseminations
☐	BH1	9 Behaviour- Exhibits a lack of concern about fees and costs
☐	BH2	10 Behaviour- Makes statements regarding illegal activities
☐	BH3	11 Behaviour- Nervous/erratic/defensive behaviour and/or avoids contact
☐	BH4	12 Behaviour- Questions processes and thresholds and/or indicates a desire to avoid reporting
☐	BH5	13 Behaviour- Unwilling or unable to provide information regarding the activity/transaction
☐	Cash1	le accounts, or from multiple people to one account
☐	Cash2	or wrapped in an uncommon way, or where total sum is

*SECTOR SUPERVISORS

DIA   Department of Internal Affairs
FMA   Financial Markets Authority
RBNZ   Reserve Bank of New Zealand

8

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Remember to save your report as you go.

NEW REPORTS ▾   DRAFTED REPORTS ▾   SUBMITTED REPORTS ▾   MY GOAML ▾   STATISTICS   ADMIN ▾   HELP   LOGOUT

SAR: 757333-0-0

Attachments

Indicators 2

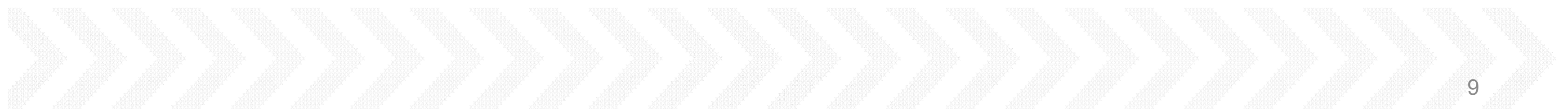Activity

Activity

Report Parties

➕ 🖸 Account   ➕ 👤 Person   ➕ 🏢 Entity

➕ Goods and Services

2
**Select an *Involved Party Type* by clicking on either:
'Account' 'Person' or *'Entity'***

Entity= Business, Trust, etc.

1
Click on the activity tab.

9

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In this example we have selected 'Person'. Add all the information you hold on the person. The minimum requirement is the persons first and last name and either a:
- ➤ DOB
- ➤ Address
- ➤ Phone Number
- ➤ Email address
- ➤ Identification document
- ➤ CCTV footage of the person

If you don't have this data but have other information that may identify the person (e.g. vehicle registration number) please send a query through the goAML message board.

Remember to save your report as you go.

If the involved party is 'your client' the same mandatory fields apply as the STR Report (also see Regulations).

Information provided in the 'Passport' and 'NZDL' fields above will need to be repeated in the 'Identification' tab.

If using the drop-down calendar to select the date of birth for a person, ensure you select the appropriate year.

Passport information from any country can be entered in these fields.

If a New Zealand Drivers Licence was used as identification enter here. Do not add version number.

NEW REPORTS ▾   DRAFTED REPORTS ▾   SUBMITTED REPORTS ▾   MY GOAML ▾   STATISTICS   ADMIN ▾   HELP   LOGOUT

SAR: 757333-0-0

Attachments
Indicators ②
Activity

Account
Entity
Person

Significance | Reason | Comments
First Name is required! | Middle Name | Last Name is required! | Date of Birth — d/MM/yyyy
Gender | Alias | NZDL | Passport Number
Passport Country | Residence | Nationality 1 | Nationality 2
Nationality 3 | IRD Number | Comments

+ Employer Address
+ Employer Phone
+ Addresses
+ Email
+ Identification
+ Phones

10

Important: All parties mentioned in the 'Reason' field must be captured as an 'Involved Party' in the report.

NEW REPORTS ▾   DRAFTED REPORTS ▾   SUBMITTED REPORTS ▾   MY GOAML ▾   STATISTICS   ADMIN ▾   HELP   LOGOUT

SAR: 757333-0-0

Attachments

Indicators 2

Activity

＋ 🖥 Account   ＋ 👤 Person   ＋ 🖥 Entity

Person

Significance	Reason	Comments

First Name is required!	Middle Name	Last Name is required!	Date of Birth
			d/MM/yyyy

Gender	Alias	NZDL	Passport Number

Passport Country	Residence	Nationality 1	Nationality 2

Nationality 3	IRD Number	Comments

＋ Employer Address

＋ Employer Phone

＋ Addresses

＋ Email

＋ Identification

＋ Phones

To add another *Involved Party* click on either:
'Account'* *'Person'* or *'Entity'

＋ 🖥 Account   ＋ 👤 Person   ＋ 🖥 Entity

If your report involves Goods and Services that should be captured in your report click on the green '+' icon to add this section to your report.

SAR: 757333-0-0

Attachments

Indicators 2

Activity

∨ 👤 John Doe

∨ 🏢 John Doe Limited

∨ 💼

Name
John Doe Limited

Commercial Name

Url

Incorporation Country Code

Incorporation Legal Form

Business

Incorporation Date
d/MM/yyyy

+ Addresses

+ Director(s)

+ Phones

Art

Bonds, stocks, or other securities

Collectibles

Consumer goods (electronics, furniture, etc.

Industrial equipment

Intellectual property rights

Jewellery, precious metals, precious stones

Other

Other financial instrument not listed

Purchase into company

Real estate

Services

Vehicle

Weapon

+ 💷 Acco...   Person   + 📋 Entity

Enter details of the Goods and/or Services here.

+ **Goods and Services**

∨ **Goods and Services**

Click on the appropriate '*Item Type*' from the drop-down list.

Item Type is required!

Item Make

Description

Previously Registered To

Presently Registered To

Estimated Value

Status Code

Disposed Value

currency Code

Size

Size UOM
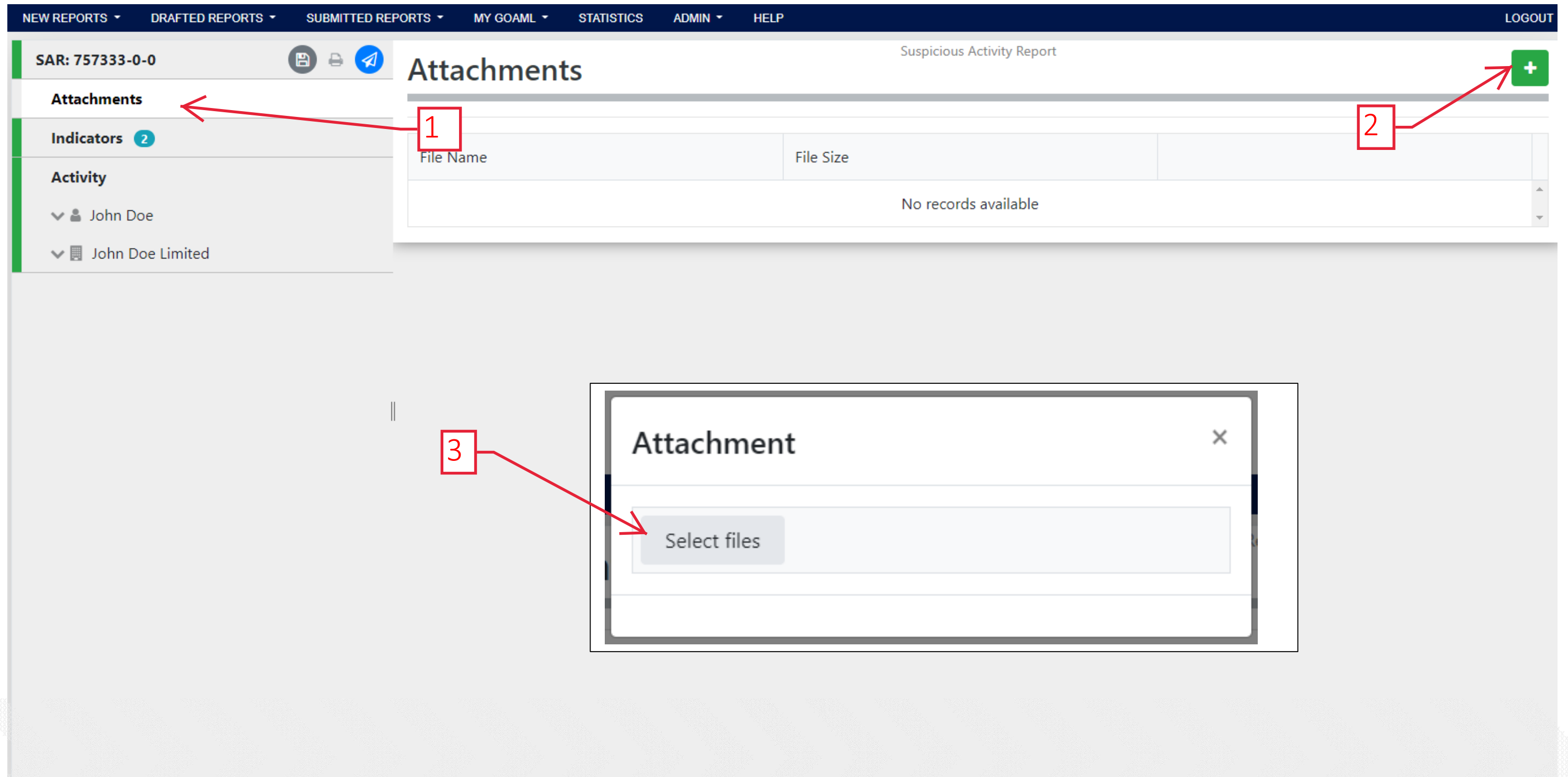
Registration Date
d/MM/yyyy

Registration Number

Identification Number

Comments

Status Comments

+ Address

12

To add any attachments (i.e. copies of identification, CCTV stills, statements etc) to your report do the following:

1. **Click on 'Attachments' tab in the Navigation Panel**
2. **Click on the green '+' icon and the 'Attachment' pop-up will display.**
3. **Click 'Select Files' and select the appropriate documents and then click 'Upload'**

Once all involved parties have been captured in the report and all mandatory fields have been completed your Navigation Panel should turn green and the submit button will turn blue. Prior to submitting we recommend you preview your report by clicking on the printer icon.

1
Click the printer icon to open another tab to preview and print/ save the report before submitting it.

Expand All ⤢   Collapse All ⤡   Print 🖶 ←

Click here to print.

Suspicious Activity Report (SAR)

| NEW REPORTS ▾ | DRAFTED REPORTS ▾ | SUBMITTED RE | Report ID: **757333-0-0** | Reporting Entity: **Financial Intelligence Unit (FIU)** | Local Currency Code: **NZD** | Submitted On: |

SAR: 757333-0-0   💾 🖶 ➤

Attachments

Indicators ②

2
Click expand all to view the entire report (if the preview field isn't highlighted & does not open, click on 'Save' then preview)

Activity

∨ 👤 John Doe

∨ 🏢 John Doe Limited

Please preview all reports prior to submitting them, to ensure that all required fields are completed correctly. You may wish to have a work colleague peer review your report. If you identify amendments that need to be made following the review of your report close this browser tab and make the amendments/ additions

In order to preview your report the printer icon must be highlighted grey.
To make the printer icon grey you may need to click the save icon first.

💾 🖶 ➤

🖶 ➤
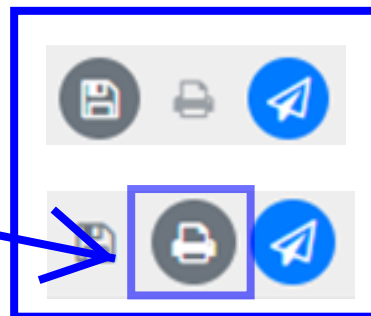
NOTE: Icons in the Navigation Panel highlighted grey indicate the action is available to use, but is not mandatory. However some grey icons need to be clicked before another icon can be used.

14

To save an Electronic Copy of your report do the following:
1. **Select 'Save as PDF' from drop down menu then**
2. **Click 'Save' and save the PDF in your business secure compliance records folder.**
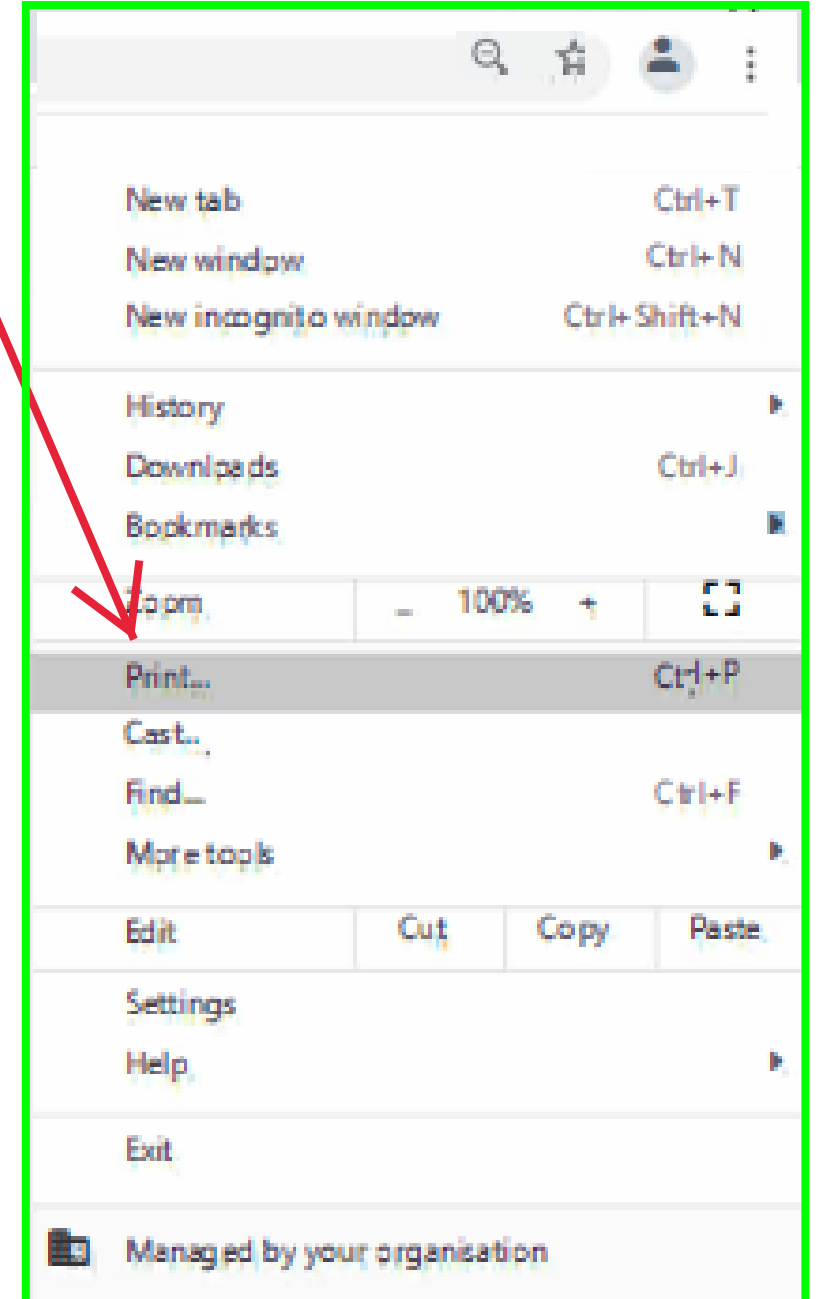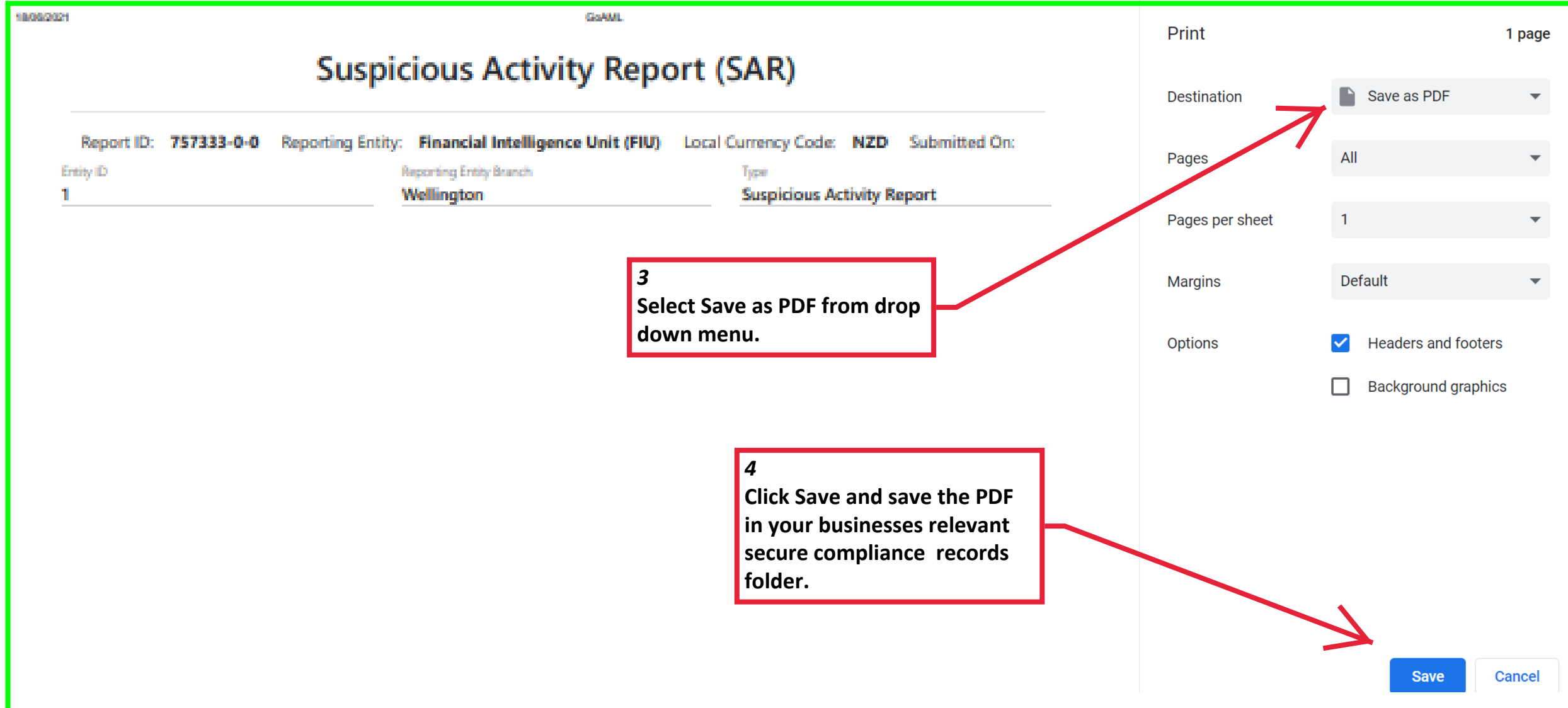**Once saved you can close the preview tab.**

2
Click Print in the Drop Down Menu

18/08/2021   GoAML

Suspicious Activity Report (SAR)

Report ID: **757333-0-0**   Reporting Entity: **Financial Intelligence Unit (FIU)**   Local Currency Code: **NZD**   Submitted On:

Entity ID
1

Reporting Entity Branch
Wellington

Type
Suspicious Activity Report

Print	1 page
Destination	📄 Save as PDF ▾
Pages	All ▾
Pages per sheet	1 ▾
Margins	Default ▾
Options	☑ Headers and footers
	☐ Background graphics

3
Select Save as PDF from drop down menu.

4
Click Save and save the PDF in your businesses relevant secure compliance records folder.

Save   Cancel

New tab			Ctrl+T
New window			Ctrl+N
New incognito window			Ctrl+Shift+N
History			▶
Downloads			Ctrl+J
Bookmarks			▶
Zoom	—	100% +	〔 〕
Print...			Ctrl+P
Cast...			
Find...			Ctrl+F
More tools			▶
Edit	Cut	Copy	Paste
Settings			
Help			▶
Exit			
📑 Managed by your organisation			

Submit your Report. If the submit button is not blue you cannot submit your report, check the Navigation Panel for any tabs that are red.
If still experiencing issues refer to the 'Problem Solving and Trouble Shooting' guidance document in the 'Resource Library'

Click on the blue button to submit your report.

NEW REPORTS ▼	DRAFTED REPORTS ▼	SUBMITTED REPORTS ▼	MY GOAML ▼	STATISTICS	ADMIN ▼	HELP	LOGOUT

SAR: 757333-0-0

Attachments

Indicators 2

Activity

∨ 👤 John Doe

∨ 🏢 John Doe Limited

➕ Employer Phone

➕ Addresses

➕ Email

➕ Identification

➕ Phones

∨ **Entity**

Significance

Reason

Comments

* Name
John Doe Limited

Incorporation Number

Incorporation Country Code

Incorporation Legal Form

Commercial Name

Email

Business

Incorporation Date
d/MM/yyyy

Url

Comments

➕ Addresses

➕ Director(s)

➕ Phones

16