# MINISTRY OF LAW

S I N G A P O R E

# Screening Function Guide

For the precious stones and precious metals dealers sector
on how to conduct screening against targeted financial sanctions and terrorism financing

*Note: Screenshots provided are for demonstration purposes only.*

# Background

- Regulated dealers are required to take reasonable measures related to targeted financial sanctions and terrorism financing. Where a regulated dealer has reason to suspect that the customer or person on whose behalf the customer is acting is a designated person under the relevant United Nations (**UN**) Regulations , or a terrorist or terrorist entity under the Terrorism (Suppression of Financing) Act (**TSOFA**), the regulated dealer must:
  - (a) decline to enter into any transaction with the customer;
  - (b) terminate any transaction entered into with the customer; and
  - (c) File a suspicious transaction report (**STR**).

- Such measures include, but not limited to, conducting name screening against the lists of designated persons under the relevant UN Regulations, and terrorists and terrorist entities under the TSOFA against the following information sources:
  - (a) MAS' website on targeted financial sanctions under the UN Regulations for the lists of designated individuals and entities. https://www.mas.gov.sg/regulation/anti-money-laundering/targeted-financial-sanctions/lists-of-designated-individuals-and-entities
  - (b) MHA's Inter-Ministry Committee on Terrorist Designation (**IMC-TD**) website on terrorist designation and legislation for countering the financing of terrorism. https://www.mha.gov.sg/what-we-do/managing-security-threats/countering-the-financing-of-terrorism

- The screening function in the screening module of *my*Pal is developed to help registered dealers conduct screening against the lists uploaded in the "List of Designated Individuals and Entities" and "Persons identified in TSOFA and Alert List" sections of the screening module.

- Please note that the screening function is only for the purpose of screening names against the UN sanction lists and persons identified in TSOFA and Alert list. It does not screen names against any other database and must not be used for any other purpose.

- The use of this module is voluntary, subject to terms and conditions set by the Ministry of Law, and at the user's own risk. The Ministry of Law shall not be responsible or liable in any way for any business decision made by registered dealers based on the search results, or any errors in the screening module, the screening function of the screening module, the screening results presented by the screening module, or the lists uploaded in the screening module.

- Registered dealers are reminded that they remain ultimately responsible for compliance with their obligations under the Precious Stones and Precious Metals (Prevention of Money Laundering and Terrorism Financing) Regulations 2019.

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# Accessing Screening Function

- Login to *my*Pal at https://go.gov.sg/mypal using Singpass.
- Click the <Screening> tile on *my*Pal dashboard or at the sidebar under <Menu>.

# How to use the Screening Function

- Type the identifier of the customer or person on whose behalf the customer is acting in the search box. Click <Search> to conduct the screening.



- For example, when the name "**Mas Selamat Kastari**" is searched, all results containing the keywords "Mas", "Selamat" **and** "Kastari" in the same line will be displayed.

# Using the Screening Function

## Method 1 – Name only

Type the name of the customer or person on whose behalf the customer is acting as stated on the identification document.
The screening function will display all results containing the keywords in the same line.

- Consider using fewer keywords as the screening function will only display results with a 100% match to all the keywords searched.
- For example, search using "Mas Selamat" instead of "Mas Selamat Kastari". All results with a 100% match to the keywords "Mas" **and** "Selamat" in the same line will be displayed.
  - ✓ **Displayed:** "Mas Selamat Kastari" as both "Mas" and "Selamat" are matched.
  - ✓ **Displayed:** "Selamat Mas" as both "Mas" and "Selamat" are matched.
  - ✓ **Displayed:** Bodmas bin Selamat" as both "Mas" and "Selamat" are matched.
  - ✗ **Not displayed:** "Mas Bintulu" as "Selamat" is not matched.
  - ✗ **Not displayed:** "Ucapan Selamat" as "Mas" is not matched.

# Using the Screening Function

## Method 2 – Name and date of birth or NRIC/ passport number

Type the name of the customer or person on whose behalf the customer is acting and date of birth or NRIC/ passport number as stated on the identification document, separated by a semi-colon (;) (e.g. "John Alan Tan; 1969-12-27").

The screening function will display all results containing the keywords (e.g. name, date of birth or NRIC/ passport number) in the same line.

- Consider using fewer keywords as the screening function will only display results with a 100% match to all the keywords searched.
- For example, search using "John Tan; 1969" instead of "John Alan Tan; 1969-12-27". All results with a 100% match to the keywords "John" **and** "Tan" in the same line **or** "1969" will be displayed.
    - ✓ **Displayed:** "John Alan Tan" as both "John" and "Tan" are matched.
    - ✓ **Displayed:** "Johnson Tan" as both "John" and "Tan" are matched.
    - ✓ **Displayed:** "1969-12-27" as "1969" is matched.
    - ✗ **Not displayed:** "John Lim" as "Tan" is not matched.
    - ✗ **Not displayed:** "1977-12-27" as "1969" is not matched.

# Using the Screening Function

- When using the date of birth identifier, key it in the format "YYYY-MM-DD" (e.g. 1989-09-27 for 27 Sep 1989).
- Avoid using nationality as an identifier to search as the screening function will display all results containing the nationality.
- The use of multiple identifiers (e.g. name; date of birth) will increase the number of results displayed.

# Assessing the Details of the Screening Hit

Assess the screening results by reviewing the details of the screening hits. To view more details of the screening hit, click on the link under <File Name> to open the list and search for the name using the reference number.
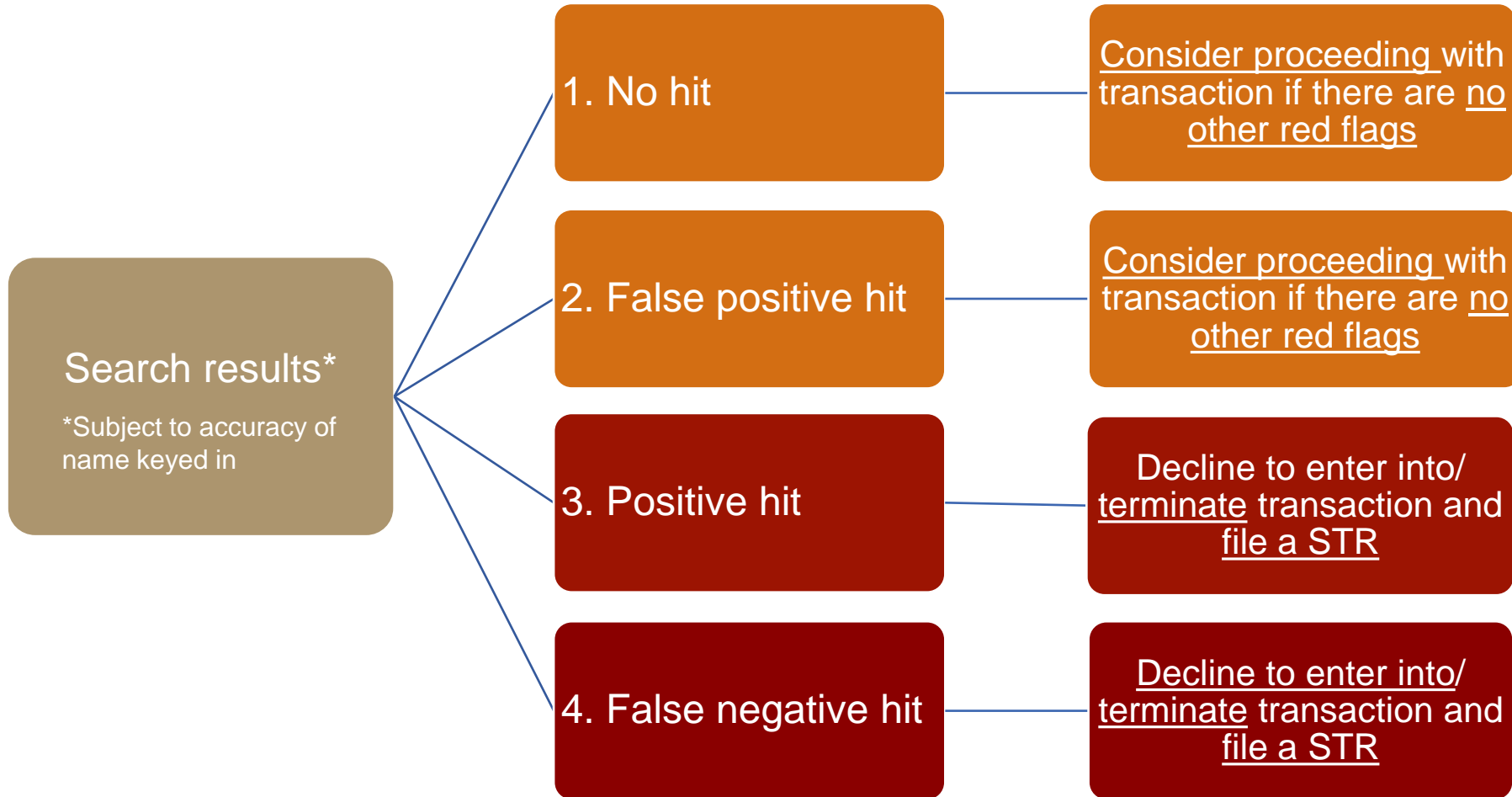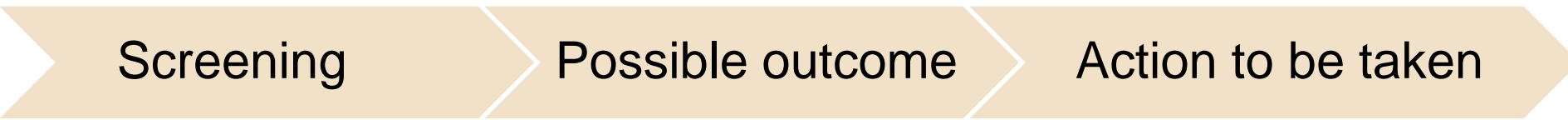


**Details of Individual**

**Click here to open list**

QDi.263 **Name:** 1: HAFIZ 2: MUHAMMAD 3: SAEED 4: na
**Title:** na **Designation:** na **DOB:** 5 Jun. 1950 **POB:** Sargodha, Punjab, Pakistan **Good quality a.k.a.:** a) Hafiz Mohammad Sahib b) Hafiz Mohammad Sayid c) Hafiz Muhammad d) Hafiz Saeed e) Hafez Mohammad Saeed f) Hafiz Mohammad Sayeed g) Tata Mohammad Syeed h) Mohammad Sayed i) Muhammad Saeed **Low quality a.k.a.:** Hafiz Ji **Nationality:** Pakistan **Passport no:** na **National identification no:** Pakistan 3520025509842-7 **Address:** House No. 116E, Mohalla Johar, Lahore, Tehsil, Lahore City, Lahore District, Pakistan (location as at May 2008) **Listed on:** 10 Dec. 2008 ( amended on 17 Jul. 2009 ) **Other information:** Muhammad Saeed is the leader of Lashkar-e-Tayyiba (QDe.118). INTERPOL-UN Security Council Special Notice web link: https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals click here

# Possible Screening Outcomes and Follow-up

| Screening | Possible outcome | Action to be taken |
|---|---|---|
| Search results*<br><br>*Subject to accuracy of name keyed in | 1. No hit | Consider proceeding with transaction if there are no other red flags |
| | 2. False positive hit | Consider proceeding with transaction if there are no other red flags |
| | 3. Positive hit | Decline to enter into/ terminate transaction and file a STR |
| | 4. False negative hit | Decline to enter into/ terminate transaction and file a STR |

# 1. Possible Screening Outcome – No hit

**No hit**: The screening displayed 0 results or no screening hit.

For example, the search "Andrew Kim" displayed 0 results. This indicates that there were no records of the identifier "Andrew Kim". You may consider proceeding with the transaction if there are **no other red flags**.



- If identification number is available, dealer should also consider screening it as the name on the lists might be in dialect or alias.
- It is the dealer's responsibility to ensure that the searches are sufficient and accurate even if the screening displayed 0 results or no screening hit.

# 2. Possible Screening Outcome – False positive hit

**False positive hit**: The screening displayed screening hits but can be dismissed because the other identifiers do not match with the customer's details.

For example, the search "Zaki Ezat" displayed 1 result "Zaki Ezat Zaki Ahmed". However, the identifiers on the passport (e.g. date of birth, nationality etc) and other personal details did not match the result displayed.

This search result may be dismissed as a false positive hit. You may consider proceeding with the transaction if there are **no other red flags**.

### Search Screening List Content ✕

| Zaki Ezat | | | | | | | 🔍 |

| Name | Alias | Date of Birth (YYYY-MM-DD) | ID / Passport No. | Nationality | Address | Reference No. | File Name |
|------|-------|---------------------------|-------------------|-------------|---------|---------------|-----------|
| 1. ZAKI 2. EZAT 3. ZAKI 4. AHMED | Rif'at Salim; Abu Usama | 1960-04-21 | - | Egypt | (May be on the Pakistani-Afghan border) | QDi.193 | ISIL Da esh and Al-Qaida List.pdf |

- It is the dealer's responsibility to ensure that the false positive hit(s) were dismissed accurately to prevent dealing with a designated person, or a terrorist or terrorist entity.

# 3. Possible Screening Outcome – Positive hit

**Positive hit**: The screening displayed screening hits that can be conclusively verified because the other identifiers matched with the customer's details.

For example, the search "Mas Selamat" displayed 2 results. The identifiers from NRIC (e.g. date of birth, nationality etc) and other personal details matched one of the results displayed.

This search result is a positive hit. You must **decline to enter into/ terminate** transaction and **file a STR**.

| Search Screening List Content | | | | | | | ✕ |
|---|---|---|---|---|---|---|---|
| Mas Selamat | | | | | | | 🔍 |
| **Name** | **Alias** | **Date of Birth (YYYY-MM-DD)** | **ID / Passport No.** | **Nationality** | **Address** | **Reference No.** | **File Name** |
| Mas Selamat bin Kastari | - | 1961-01-23 | - | Singapore citizen | - | 4 | First Schedule of TSOFA_20220519.pdf |
| Masyhadi bin Mas Selamat | - | 1989-01-08 | - | Singapore citizen | - | 8 | First Schedule of TSOFA_20220519.pdf |

- Download the list under <File Name> and view the details of the result to ensure that you are not dealing with a designated person, or a terrorist or terrorist entity.
- It is an offence to disclose a STR that was filed or to tip off the customers.

# 4. Possible Screening Outcome – False negative hit

**False negative hit**: The screening displayed 0 results or no screening hit when there should be at least one screening hit. This could be due to the following reasons:

a. Incorrect name or identifier keyed in. For example, "Kim **Chl** Sam" was searched instead of "Kim Chol Sam"; "**1972**-03-11" was searched instead of "1971-03-11".

**Incorrect identifier – No result**



**Correct identifier – Result displayed**

# 4. Possible Screening Outcome – False negative hit

**False negative hit**: The screening displayed 0 results or no screening hit when there should be at least one screening hit. This could be due to the following reasons:

b. Only alias was searched. For example, "Andrew Kim" was searched instead of "Kim Chol Sam". However, both "Kim Chol Sam" and "Andrew Kim" are the same individual.

**Alias searched – No result**

Search Screening List Content

Andrew Kim

| Name | Alias | Date of Birth (YYYY-MM-DD) |
|------|-------|-----------------------------|
|      |       |                             |

**Correct identifier – Result displayed**

Search Screening List Content

Kim Chol Sam

| Name | Alias | Date of Birth (YYYY-MM-DD) |
|------|-------|-----------------------------|
| 1. KIM 2. CHOL SAM | - | 1971-03-11 |

- Consider screening the alias name and the name on identification document using the multiple identifiers method (e.g. Andrew Kim; Kim Chol Sam)
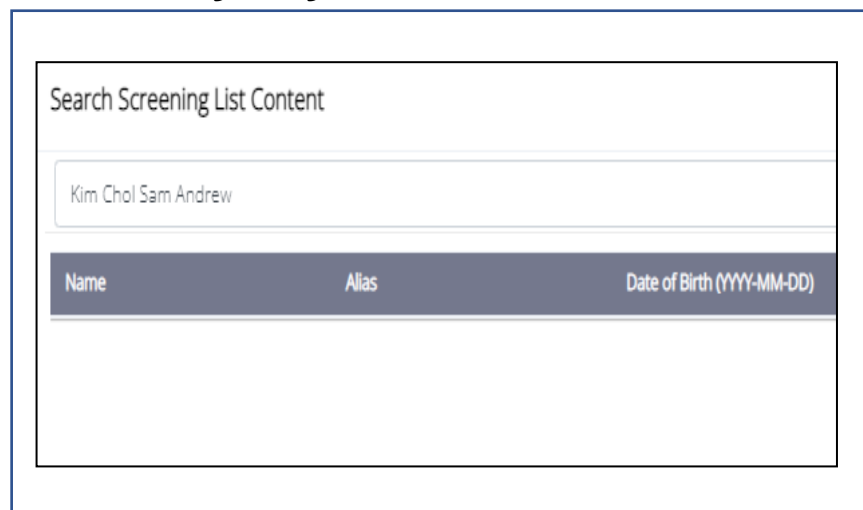
# 4. Possible Screening Outcome – False negative hit

**False negative hit**: The screening displayed 0 results or no screening hit when there should be at least one screening hit. This could be due to the following reasons:

c. Too many keywords used. For example, "Kim Chol Sam Andrew" was searched instead of "Kim Chol Sam". The screening displayed 0 results, but there is a screening hit if "Kim Chol Sam" was searched.

**Too many keywords – No result**

Search Screening List Content

Kim Chol Sam Andrew

| Name | Alias | Date of Birth (YYYY-MM-DD) |
|------|-------|----------------------------|
|      |       |                            |

**Fewer keywords – Result displayed**
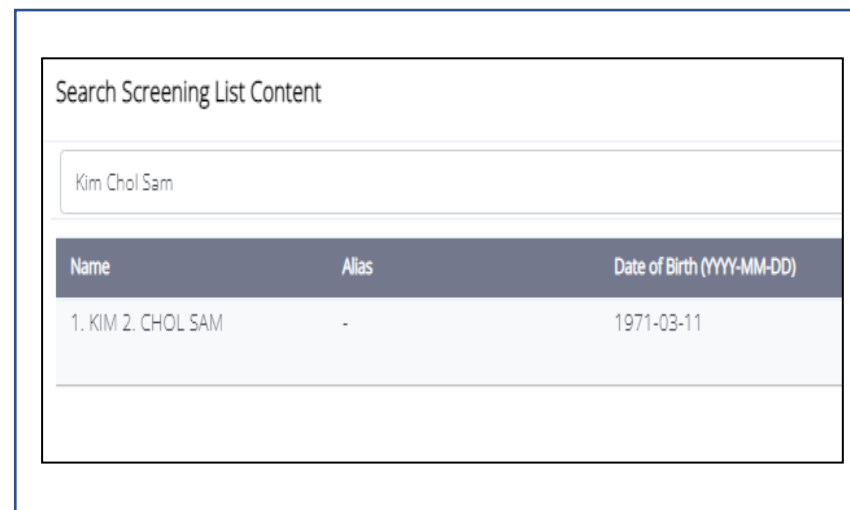
Search Screening List Content

Kim Chol Sam

| Name | Alias | Date of Birth (YYYY-MM-DD) |
|------|-------|----------------------------|
| 1. KIM 2. CHOL SAM | - | 1971-03-11 |

- Consider using fewer keywords as the screening function will only display results with a 100% match to the keywords searched.

# Saving the Screening Results

Regulated dealers are strongly encouraged to document the results of the screening and assessment of the screening results.

To download a copy of the screening result in PDF, Click on <Save Result> to download and save it onto your computer or mobile device.

Search Screening List Content

Mas Selamat

| Name | Alias | Date of Birth (YYYY-MM-DD) | ID / Passport No. | Nationality | Address | Reference No. | File Name |
|------|-------|---------------------------|-------------------|-------------|---------|---------------|-----------|
| Mas Selamat bin Kastari | - | 1961-01-23 | - | Singapore citizen | - | 4 | First Schedule of TSOFA_20220519.pdf |
| Masyhadi bin Mas Selamat | - | 1989-01-08 | - | Singapore citizen | - | 8 | First Schedule of TSOFA_20220519.pdf |

Save Result

2 record(s) found.

# Saving the Screening Results

**Display on PDF**

| Keyword(s): Mas Selamat | | | | | | 2022-05-11 16:42:25 | |
|---|---|---|---|---|---|---|---|
| Name | Alias | Date of Birth (YYYY-MM-DD) | ID / Passport No. | Nationality | Address | Reference No. | File Name |
| Mas Selamat bin Kastari | - | 1961-01-23 | - | Singapore citizen | - | 4 | First Schedule of TSOFA.pdf |
| Masyhadi bin Mas Selamat | - | 1989-01-08 | - | Singapore citizen | - | 8 | First Schedule of TSOFA.pdf |

- The PDF will display the following items:
    1. Keyword(s) or identifier(s) used for the screening;
    2. Date and time stamp when the screening was conducted; and
    3. Screening results.

- If the screening results are captured on a screenshot or printout, the date and time of the search **must** also be captured.

# Appendix: Terms and Conditions for using Screening Function

## Terms and Conditions

- The Precious Stones and Precious Metals (Prevention of Money Laundering and Terrorism Financing) Regulations 2019 requires regulated dealers to take reasonable measures to assess whether the customer, or any person on whose behalf the customer is acting, is a terrorist or terrorist entity under the Terrorism (Suppression of Financing) Act (**TSOFA**), or a designated person under the relevant United Nations (**UN**) Regulations.

- This module allows registered dealers to conduct screening based on the lists uploaded in the "List of Designated Individuals and Entities" and "Persons identified in TSOFA and Alert List" sections, which respectively list the names of designated persons under the relevant UN Regulations and terrorists and terrorist entities under the TSOFA. Please note that the search function is only for the purpose of screening names against the UN sanction lists or persons identified in TSOFA and Alert list. It does not screen names against any other database and must not be used for any other purpose.

- This module is not designed to replace customer due diligence measures. Registered dealers are reminded that they must continue to conduct their own appropriate additional searches to ensure that they fully understand the money laundering/terrorism financing (**ML/TF**) risk posed by their customers and to take appropriate measures to mitigate the ML/TF risk.

- If registered dealers wish to rely on the search results, the search results (showing the date and time of the search) **must** be captured (e.g. in a screenshot or printout) and such records must be retained by registered dealers for 5 years from the date of the search.

- Registered dealers remain responsible for assessing the outcome of search results, determining if the names screened match the names on the UN sanction lists or persons identified in TSOFA and Alert list, and keeping records of their search results and their assessment of search results for a period of at least 5 years. Registered dealers are reminded to decline to enter into any transaction with a person on the UN sanction lists or persons identified in TSOFA and Alert list, to terminate any transaction with such person and to file a suspicious transaction report.

- Registered dealers are reminded that they remain ultimately responsible for compliance with their obligations under the Precious Stones and Precious Metals (Prevention of Money Laundering and Terrorism Financing) Regulations 2019.

- The use of this module is voluntary, subject to these terms and conditions, and at the user's own risk. The Ministry of Law shall not be responsible or liable in any way for any business decision made by registered dealers based on the search results, or any errors in the screening module, the search function of the screening module, the search results presented by the screening module, or the lists uploaded in the screening module.

☑ **I have read and agree with the above terms and conditions.**

**You are required to acknowledge the terms and conditions before using the screening function**