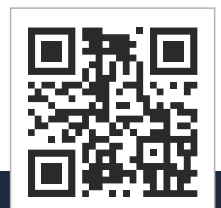


# A Closer Look into the **Screening Analyst's Role and Responsibilities in AML Compliance**



A Screening Analyst is an inevitable member of the compliance team in any organisation subject to Anti-Money Laundering, Counter-Financing of Terrorism, and Counter-Proliferation Financing (AML/CFT and CPF) compliance.

Screening Analysts also ensure that businesses comply with relevant Targeted Financial Sanctions (TFS) regulations.

The Role of a Screening Analyst in AML compliance is crucial for ensuring businesses comply with relevant Targeted Financial Sanctions (TFS) regulations.

# TABLE OF CONTENTS

---



What Is a Screening Analyst?



Skills and Qualifications of a Screening Analyst



The Responsibilities of a Screening Analyst in AML Compliance



The Role of a Screening Analyst in AML Compliance



Conclusion



About RapidAML

# What Is a Screening Analyst?

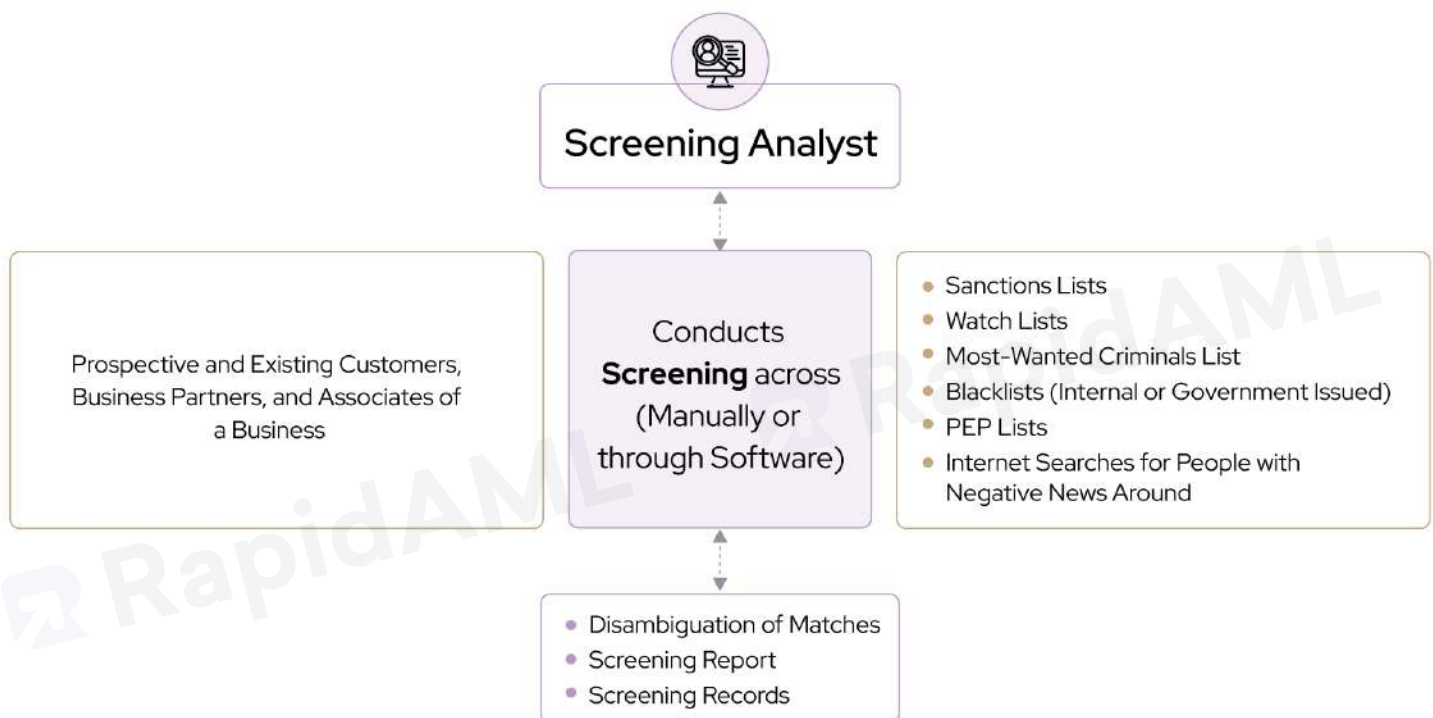


# What Is a Screening Analyst?

---

A Screening Analyst, in the context of **AML/CFT** and **CPF** compliance, is a natural person, usually an employee responsible for carrying out name screening, commonly known as watchlist screening or sanctions screening of the existing and prospective customers, business partners, associates or suppliers of a business, all referred as 'customers' for ease of understanding.

His or her responsibilities also include identifying **PEPs** and people with adverse media matches.



# Skills & Qualifications of a Screening Analyst



# Skills and Qualifications of a Screening Analyst

---

There are no strict requirements laid down by the regulations in any country regarding the bare minimum qualification requirements or certifications a person needs to acquire to fulfil the responsibilities of a screening analyst. However, a screening analyst must possess a certain set of skills to carry out their responsibilities efficiently.

Some of these skills and know-how are listed below:

- Functional knowledge of which lists need to be screened for the business they are working for. The screening analyst must have clarity regarding which sanctions lists, watchlists, or internal blacklists they must screen their customers against.
- Background knowledge of AML/CFT/CPF and Targeted Financial Sanctions (TFS) regulations.
- Ability to analyse screening results generated by various screening software, enter findings, and generate reports, both manually and through a name screening software.

The roles and responsibilities of a screening analyst are elaborated at length for a clearer picture of the necessary skillset required for conducting watchlist screening or name screening efficiently.

# The Responsibilities of a Screening Analyst in AML Compliance



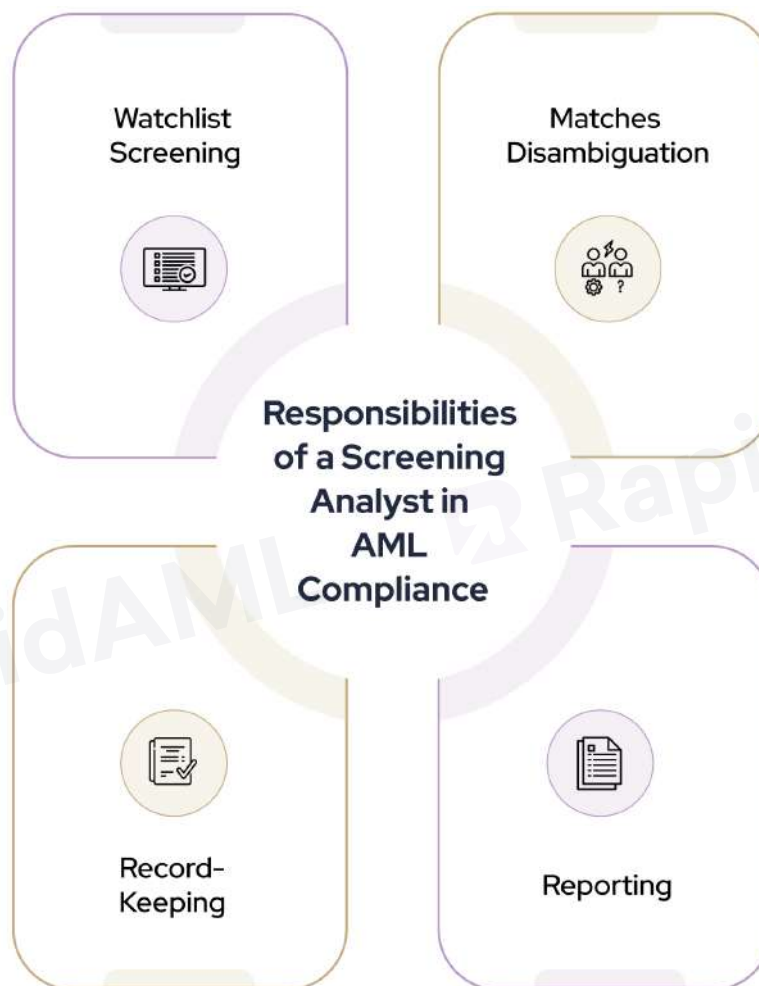


# The Responsibilities of a Screening Analyst in AML Compliance

---

A screening analyst plays a critical role in facilitating smooth AML compliance for any business.

Screening analysts are responsible for carrying out major responsibilities surrounding TFS compliance, such as:





## Watchlist Screening

A sanctions screening analyst is responsible for ensuring that the watchlist screening process is carried out efficiently and in a timely manner.

The watchlist screening process entails subscribing to applicable and relevant lists, such as local and international terrorist lists.

A screening analyst is responsible for identifying and subscribing to a relevant and applicable sanctions screening list for conducting screening exercises. Some of the frequently used sanctions list or screening lists are:

### Global Screening Lists to be considered by Screening Analysts



#### United Arab Emirates

- UN Sanctions
- UAE Local Terrorist Lists



#### European Union

- UN Sanctions
- Reinforced and Enhanced Form of EU Sanctions
- Fully Autonomous Sanctions as listed on the EU Sanctions Map
- Consolidated List of Persons, Groups, and Entities subject to EU Financial Sanctions
- The Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020



#### United Kingdom

- UN Sanctions
- Sanctions Lists prescribed under the Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020
- The UK Sanctions List
- The UK HM Treasury List



## United States of America

- UN Sanctions
- US Consolidated Sanctions (Sanction List of the United States)
- Bureau of Industry and Security (The United States of America)
- Department of State, Non-proliferation Sanctions (US)
- US Department of State, Statutorily Debarred Parties



## India

- UN Sanctions
- Sanctions List issued by the Ministry of Home Affairs (MHA) for Unlawful Associations, Terrorist Organisations, and Individual Terrorists
- Other Relevant Sanctions Lists



## Japan

- UN Sanctions
- Sanctions measures according to the Foreign Exchange and Foreign Trade Act ("FEFTA")
- Japan Economic Sanctions and List of Eligible People



## Nigeria

- UN Sanctions
- Sanctions list under the Regulation for The Implementation of Targeted Financial Sanctions on Terrorism, Terrorism Financing and Other Related Measures, 2022



## Singapore

- UN Sanctions
- MAS (Sanctions and Freezing of Assets of Persons – Iran) Regulations 2016
- MAS (Sanctions and Freezing of Assets of Persons – Democratic People's Republic of Korea) Regulations 2016

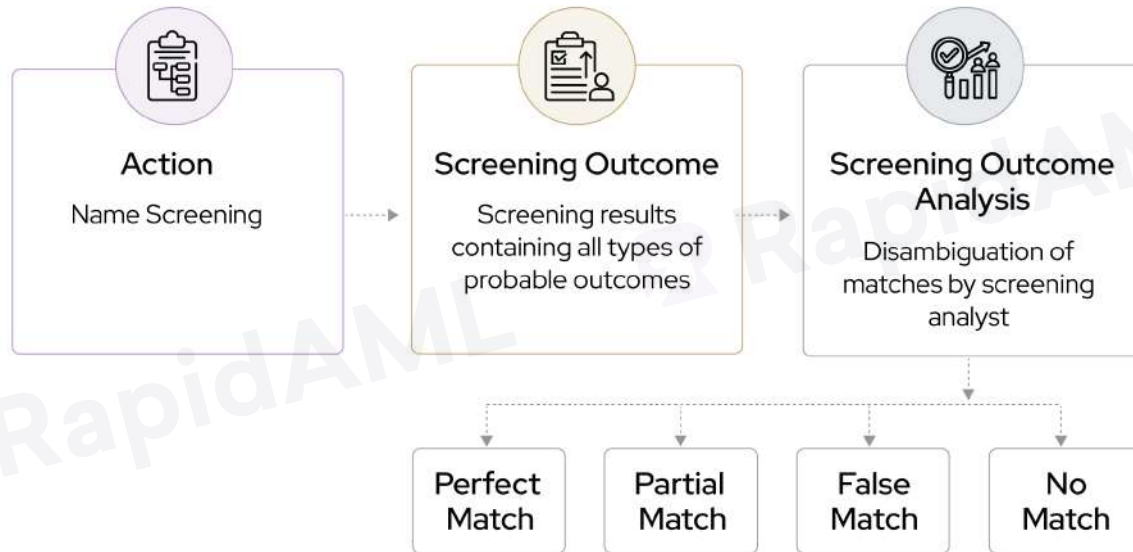


## China

- Sanctions Lists are published by the Chinese Ministry of Foreign Affairs (MFA)
- MFA responsible for governing UN Sanctions implementation in China
- Ministry of Commerce ("MOFCOM") responsible for implementing
  - Anti-foreign Sanctions Law
  - Provisions on the Unreliable Entity List ("UEL Provisions")



## Matches Disambiguation



The process of screening customers generates results. A screening analyst is required to decipher or interpret the screening results and generate a report to enable the AML Compliance Officer (AML CO) or Money Laundering Reporting Officer (MLRO) to decide on further diligence measures.

The screening analyst, after conducting the name screening of existing and prospective customers, is required to remove ambiguity (disambiguation) of the screening results generated, either manually or sanctions screening results generated by the watchlist screening or name screening software.

The removal of ambiguity is where the actual analytical skills of a screening analyst are tested. The screening analyst needs to consider several factors, such as whether the screening is carried out for a natural person or whether the screening process is carried out for a corporate entity or arrangement.

The screening analyst then needs to closely compare and analyse the profile of the customer derived from records and information of the customer available (usually collected during eKYC or document collection process of any customer relationship management (CRM) software) against the screening results generated by a Name Screening software or probable matches found while manual screening.

Each of the probable matches found during the screening process needs to be disambiguated by the screening analyst as one of the following:

**Perfect Match:**

Meaning that the match found because of screening pertains to the customer whose name was being screened against sanctioned lists necessitating further due diligence measures such as reporting to relevant authorities.

**Partial Match:**

Meaning that the match found because of the screening process cannot be conclusively or surely be said to match exactly with the customer profile that is screened. In these kinds of cases, the screening analyst usually needs to escalate to an AML CO or MLRO or file their suspicion about the name partially matching to the relevant authority for further guidance.

**False Match:**

Meaning that the match found because of the screening process does not match with the profile of the customer in any manner, and the match result is a false alert and does not pertain to the customer who was being screened.

**No Match:**

Meaning that the screening of an individual or an entity generated no results, this can be due to the customer not being included in any of the screening lists.

The screening analyst can conduct disambiguation of screening matches on the basis of the following factors:

## Screening Outcome Analysis

Factors Contributing to Match Results in the Screening Process		Disambiguation of Matches by Screening Analyst
<b>Name Screening (Natural Persons, including Ultimate Beneficial Owners (UBOs))</b>	<b>Name</b>	The screening analyst must check whether the name in the screening result matches the customer's name given on the passport or any government-issued identification document. The screening analyst must also consider spelling and phonetic pronunciation or invest in screening software that uses fuzzy matching algorithms to navigate the same.
	<b>Date and Place of Birth</b>	The screening analyst must consider similarities and discrepancies in the date and place of birth details. Sometimes, the person's name might be the same, but the date of birth or age would give further clarity if such a match were the same person as the customer.
	<b>Photo</b>	The screening analyst must consider matching the customer's photograph on the government-issued identification document with that on the screening result to eliminate false matches.
	<b>Gender</b>	Gender consideration is a basic aspect that screening analysts must consider while disambiguating screening results. Also, a few cultures have similar names for either gender, which the screening analyst must look out for.
	<b>Occupation</b>	Screening analysts must consider the occupation of the customer while disambiguating matches.
	<b>Nationality</b>	Screening analysts must consider nationality while assessing screening outcomes. Many times, names appear to be similar, and photo matching is not helpful due to a lack of data in screening software or from the customer's end. In such a situation, nationality needs to be considered to eliminate false matches.
	<b>ID Document Number</b>	An important component that a screening analyst must consider is matching the document number given on the identification document of the customer and that given in any of the match results, if any. This helps in finalising a perfect match and removing confusion around a partial match.

Factors Contributing to Match Results in the Screening Process		Disambiguation of Matches by Screening Analyst
Politically Exposed Person (PEP) Screening of Natural Persons and UBOs	Current PEP	Screening analysts must assess whether the customer is a current PEP or former PEP, followed by ascertaining whether such PEP is domestic or international and escalating the case to MLRO or AML CO for further adequate and appropriate due diligence measures.
	Former PEP	Screening analysts must investigate the degree of influence a former PEP exerts and escalate for further due diligence measures accordingly.
	Friends/ Relatives/ Close Associates of PEP	Screening analysts must screen customers thoroughly to find if any of them are friends, relatives, or close associates of a PEP and initiate due diligence measures accordingly. The screening analyst must consider a risk-based approach (RBA).

Factors Contributing to Match Results in the Screening Process		Disambiguation of Matches by Screening Analyst
Adverse Media of Natural Person	Associated Entities/ Persons	Screening analysts can rely on adverse media findings and must comb through social media platforms and search engines to ensure that there is no negative news about the customer or his known associates and entities that might indicate involvement in predicate offence, which ultimately connects with ML, FT, or PF.
	Criminal Investigations	Screening analysts must make sure that if the customer they are screening is found to be under trial or convicted for any criminal offence or has an ongoing investigation, then escalate such a customer profile to MLRO or AML CO for further steps such as reporting to the regulator.
	Regulatory Penalties	Screening analysts must check while conducting adverse media screening to see if the customer being screened has been subject to any regulatory fines or penalties for any white-collar crimes, such as insider trading, embezzlement, and fraud, to name a few.

Factors Contributing to Match Results in the Screening Process		Disambiguation of Matches by Screening Analyst
Name Screening of Corporate, Legal Entity, or Legal Arrangement	Company Name	Screening analysts are responsible for ensuring that screening carried out for corporate entities has the same name, if any, found during screening.
	Incorporation Number or Registration Number/ Trade License Number	A screening analyst is responsible for comparing the incorporation number or registration number of the entity and the matches found during screening, if any, to rule out the possibility of a corporate entity being sanctioned or censured by any of the applicable sanctions lists.
	Country of operation/ issue	A screening analyst needs to make sure that they take into consideration the country in which the entity operates while disambiguating matches, this will enable the categorisation of risk rating to be assigned on the basis of the country of operation.
	UBO	A screening analyst is responsible for finding out the UBO(s) of the corporate entity and screening the UBO(s) accordingly to identify if a natural person having controlling rights of the entity is sanctioned/PEP or not.

Factors Contributing to Match Results in the Screening Process		Disambiguation of Matches by Screening Analyst
Adverse Media Screening of Corporate, Legal Entity, or Legal Arrangement	Associated entities/ persons	A screening analyst is responsible for conducting adverse media and ensuring that the entity or its UBO(s) or known associates are not sanctioned or PEP and disambiguate matches accordingly.
	Criminal Investigations	A screening analyst must make sure that the entity itself or UBO(s), managing director or authorised signatory are screening are not found to be undertrial or convicted for any criminal offence or have an investigation ongoing; if such is the case, then the case must be escalated accordingly.
	Regulatory Penalties	Screening analysts must check while conducting adverse media screening that if entity and UBO(s) being screened has been subject to any regulatory fines or penalties for any white-collar crimes such as insider trading, embezzlement, and fraud to name a few and disambiguate the match as the case may be.





## Record-Keeping

As the process of screening and disambiguation of matches is concluded, the screening analyst is responsible for maintaining records for:

- The reports generated during the disambiguation process
- Records generated during the screening process and screening register
- Reports of the screening process, such as how many PEPs and sanctioned customers were found and adverse media records
- The findings, notes, or observations made by the screening analyst
- Escalations made to AML CO or MLRO
- Escalations made to the senior management for sign-off on high-risk customer profiles

Screening analysts need to ensure that the records are sufficiently and appropriately stored and archived within the business to meet regulatory record-keeping requirements.

The screening analyst is responsible for having a basic awareness of the duration of record-keeping requirements from country to country and supervisory authorities within the country their business operates, as a screening analyst has first-hand knowledge about the details contained in screening records and their filing or storage systems.



## Reporting

When a business conducts screening of its customers and business associates on a regular basis, there is a likely possibility that the screening results, after disambiguation of matches, might indicate that the customer screened is indeed a terrorist on a sanctions list or is suspected of having conducted money laundering or terrorist financing or is a blacklisted company that has indulged or encouraged corruption due to its UBO(s) being current or former PEPs.

When such a situation materialises, it's the responsibility of a screening analyst to report the finding of a suspicious person/entity on two levels, depending on the organisational structure of the business.

If the business itself is small scale, where the responsibilities of screening analyst, AML CO or MLRO are carried out by the owner, then the reporting of suspicious activity identified during screening disambiguation needs to be made to the regulatory authorities in a timely manner, as prescribed by the regulator in that country.

However, in medium or large-scale organisations, where the organisation chart is well-defined, and the roles and responsibilities of screening analyst are distinct from that of AML CO or MLRO, then the screening analyst is required to report internally to the AML CO or MLRO regarding findings of suspicion or sanctioned/PEP matches for further action. Following this, the AML CO or MLRO decides upon further action to be taken, such as reporting to the relevant authority. Depending on the internal AML framework, either the AML CO or MLRO reports to the regulator.

Sometimes, the screening match outcome is a partial match as the screening analyst cannot conclusively decide how to categorise a screening outcome, and then they may escalate the case to AML CO or MLRO. In such situations, an experienced AML CO or MLRO can investigate such inconclusive results, analyse such findings, and report to the authority on a partial name match if their conclusion is the same as that of the screening analyst.

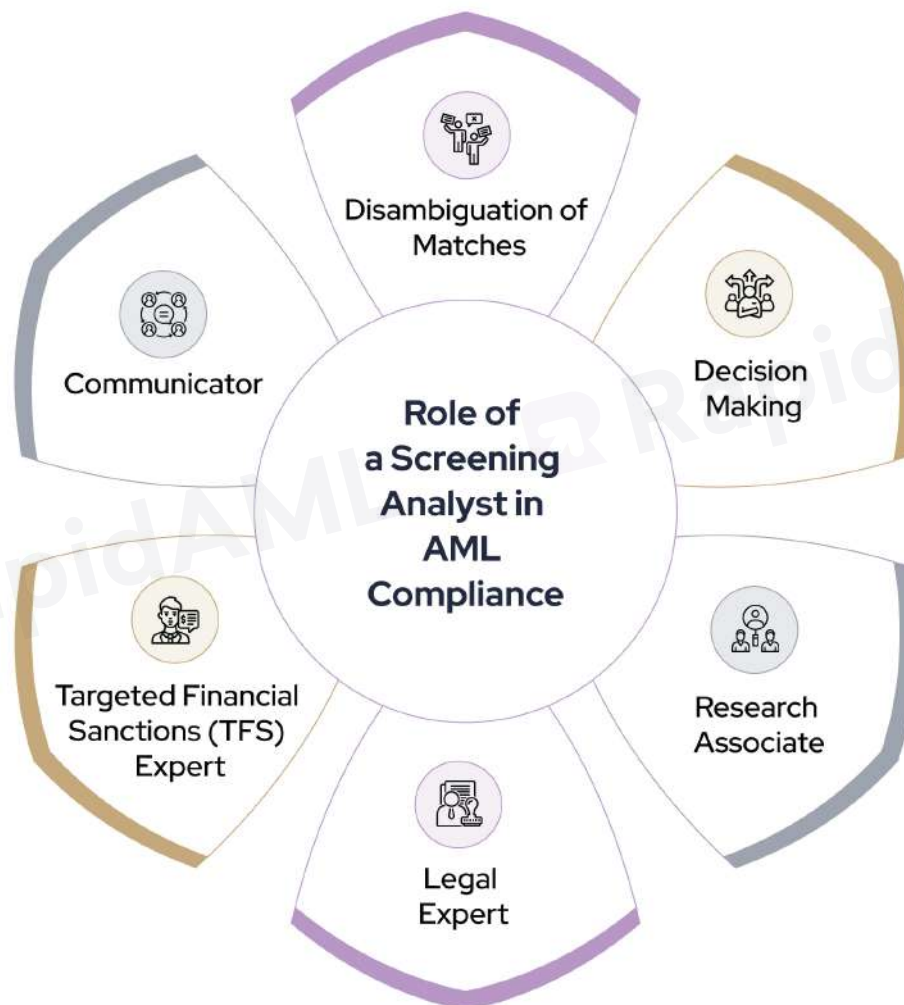
The Role of a   
Screening Analyst in  
AML Compliance



# The Role of a Screening Analyst in AML Compliance

The process of disambiguation of matches is complex and requires regulatory reporting when a screening match is found to be a perfect match, failing which the company faces fines and penalties. The screening analyst is required to analyse screening results on a case-to-case basis.

It is important to understand the role that a screening analyst plays in AML Compliance while analysing each case to be able to comprehend the depth of knowledge required to do so.



## Disambiguation of Matches

A screening analyst, as the profile suggests, plays an analytical role in the disambiguation of screening matches. There are no strict guidelines or rules anywhere regarding how to disambiguate matches, here the screening analyst is responsible for segregating matches into match types and concluding the screening process for identifying sanctioned/PEP customers.

The process of name screening and analysing its outcomes solely rests on the analytical skills of the screening analyst, necessitating that a screening analyst is able to analyse when to classify a match as a partial match or a perfect match.

The screening analyst analyses every aspect of screening outcomes, such as matches found on the basis of a similar name, country, or profile. The screening analyst assesses each customer profile based on the details available to him and generates a screening report.

## Decision Making

To be able to spot minor and intricate points of distinction among matches, a screening analyst must have the ability to pay attention to even the tiniest of details, such as the difference between passport numbers of customers and potential matches, the difference between the date of birth, the difference between original and potentially counterfeit identification documents, to name a few.

This ability to distinguish between details of each match and customer is what helps a screening analyst to disambiguate matches and arrive at a conclusive screening outcome.

## Research Associate

It is always possible that certain match results cannot be dismissed entirely as no matches, and neither can putting them in partial or perfect matches be justified due to a lack of sufficient information.

For instance, if the name only matches that of the customer and no further information is given. In such a situation, the screening analyst needs to make use of their research and investigation skills and resort to using search engines and word strings to find if any adverse media is associated with such a customer; if such is the case, then the screening analyst can further investigate into publicly available information, such as:

- Government records
- Matters of public records
- Professional and academic publications
- Press information and reports
- Documented transactions with the government
- Information that is not considered personal information or sensitive personal information according to data privacy laws and regulations

Examples of such publicly available information are:

- Voting or electoral records
- Birth and death records
- Property records
- Marriage and dissolution of marriage records
- Court orders
- Arrest and conviction records
- Licenses, estate deeds

Generally, after thoroughly researching and combing through such information, an able screening analyst can conclude whether a match is a perfect match or a false match with sufficient data to back their findings and observations.

## Legal Expert

The accuracy of screening results is largely dependent on whether the screening analyst is fully updated and aware of the current laws and regulations pertaining to the screening exercise for which they are responsible.

**Having sound, adequate, and functional knowledge of fundamental legal requirements of conducting screening is essential. A screening analyst needs to be aware of:**

- Which watchlists and sanctions lists should they subscribe to for their organisation?
- The duration of recording keeping in jurisdictions wherever the business operates.
- Basic knowledge of passport, residency and visa requirements and visa categorisations to be able to identify any anomaly in customer profile such as a fake passport or visa or logically impossible duration of stay in a country of which the passport or nationality is claimed.
- Basic understanding of ML, FT, and PF risks, white-collar crimes, and predicate offences to be able to understand and interpret the adverse media findings and investigation or research of customer profiles.
- In many cases of small-scale businesses, where the AML CO or MLRO themselves conduct screening or owners/founders such as the owner of a small-scale, one-person operated jewellery store or an independently operating real estate broker must be aware of regulatory reporting timelines and ensure that if any perfect match is found during screening, such finding is reported to the relevant regulatory authority within the prescribed time frame.

However, in large-scale, well-organised businesses, the screening analyst, AML CO or MLRO, and owners are different individuals, requiring the screening analyst to merely escalate any reporting obligations to the AML CO or MLRO in a prescribed timeframe stated in their internal AML framework.

## Targeted Financial Sanctions (TFS) Expert

The primary purpose of conducting name screening or watchlist screening is to ensure compliance with the TFS regime in force in any relevant country and the UN sanctions. The screening analyst ensures that the screening exercises are conducted and that any matches with TFS lists are reported to the regulator in a timely manner, which helps with compliance with TFS requirements.

It is important to understand that the role of screening analyst is not merely limited to entering data on screening software and downloading match results or merely comparing customer names with XML records of sanctions lists subscribed to, but the role of screening analyst is an indispensable one while trying to achieve compliance with relevant AML/CFT/CPF and TFS laws.

## Communicator

There are instances where the screening analysts themselves need to coordinate and communicate with their business customers to seek exact personal information and identification documents containing key identifier details. These documents are necessary for conducting the name screening process, and the screening analyst must have adequate communication skills to seek them from customers.

Further, in situations where there is a partial or perfect match, which requires suspending the business relationship temporarily until a conclusive decision can be taken, then at that time, the screening analyst needs to handle the customer relationship delicately.

Also, a screening analyst is required to communicate with the AML CO or the MLRO to escalate potential matches or suspicious customer profiles. In such situations, it is important that a screening analyst utilises communication skills such as reporting and escalating in a timely manner.

Communication skills also come in handy when screening analysts investigate customer profiles at any government agency to find any public records through email, telephone, or in person.




Conclusion

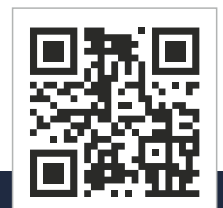


The role of screening analyst is an essential one, when any business strives to achieve complete AML/CFT and TFS compliance.

It becomes necessary for businesses to understand that sanctions compliance can be ensured only when a screening analyst conducts their roles and responsibilities with utmost care and diligence.

Ultimately, the screening analyst is a person within the organisation who identifies a sanctioned/high-risk customer and safeguards the business against ML/FT and PF risks.

About   
RapidAML



RapidAML is an AML software designed to support the compliance tasks of the **DNFBPs and the VASPs**, offering an advanced and secured technology platform

## Who we are

Facctum, founded in 2021 by a group of enthusiasts who have experience in banking, financial crime risk management technology, data science, etc., specialises in building risk management solutions with new-age technology.

## Our Mission

We understand the significance of AML compliance and recognise its complexity. Addressing this issue is our mission at RapidAML.

Our solution focuses on simplifying the intricate regime of AML compliance with advanced technology. We aim to help the regulated entities, specifically the DNFBPs and the VASPs, smoothen their AML efforts with RapidAML's end-to-end AML software..

While delivering the compliance solution to the customers, we do not undermine our adherence to the regulations and commitment to building a compliant economy.

Our working culture is in accordance with the applicable laws of the land, focusing on improving the lives of our people, elevating the compliance standard of our customers, and contributing to a society that is safe from money laundering and other financial crimes.

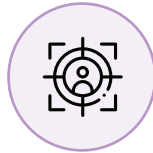
## Our Vision

Our vision is to empower DNFBPs and VASPs worldwide to combat financial crime, and protect the global financial system by providing innovative, affordable, and effective solutions.

**At RapidAML, we promote a sustainable value-creation approach, integrating human talent with advanced tech.**

## Our Core Values

We live by these guiding principles that guide our progress



### Customer Focused

We are committed to offering quality AML support to exhibit a constructive effect on the customer's business.



### Elevated Excellence

With a comprehensive, tech-driven financial crime compliance solution, we nurture customer's efforts and ignite brilliance to AML function.



### Innovation Is The Key

We strive for healthy competition, bringing out the best version of the AML tools and technologies with continuous research and improvement.



### Integrity

We value our customers, our team, and our society, and we build trust with our committed honesty and transparency.



### Together We Win

With inclusiveness and a sense of collaboration, we assist our customers in accomplishing compliance and developing a sense of shared achievement.



 **RapidAML**

✉ [info@rapidaml.com](mailto:info@rapidaml.com)

🌐 [www.rapidaml.com](http://www.rapidaml.com)



Follow us on

