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	HEADER		
	ICAEW Technical Accreditation Scheme **"Anti Money Laundering" Software Evaluation**		
	Date completed: 6th December 2022		
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1.	**INTRODUCTION AND PROLOGUE**		
Introduction			
1.01	The suitability of software for each particular user will always be dependent upon that user's individual requirements. These requirements should therefore always be fully considered before software is acquired. The quality of the software developers or suppliers should also be considered at the onset.		
1.02	Fundamentally, good software should: 1. Be capable of supporting the functions for which it was designed. 2. Provide facilities to ensure the completeness, accuracy, confidentiality and continued integrity of these functions. 3. Be effectively supported and maintained. It is also desirable that good software should: 5. Be easy to learn, understand and operate. 5. Make best practical use of available resources. 6. Accommodate limited changes to reflect specific user requirements. It is essential, when software is implemented, for appropriate support and training to be available.		
Approach to Evaluation			
1.03	The objective is to evaluate a product against a set of criteria developed by the ICAEW to ensure that the software meets the requirements of Good Accounting Software, as laid down in the summary.		
1.04	In order to effectively evaluate the software, a product specialist from the vendor completed the detailed questionnaire and provided it to the ICAEW to examine. The ICAEW's Scheme Technical Manager then reviewed the operation of the various aspects of the software assisted by a member of the vendor's technical staff and checked the answers to confirm their validity. The questions were individually reviewed and commented on and the majority of assessments were confirmed.		
1.05	The Technical Manager discussed the assessment with a member of the vendor's staff in order to clarify any points requiring further information. In the event of disagreement between the supplier and the Technical Manager, the Technical Manager's decision was taken as final and the response changed accordingly.		
1.06	The latest version of the software was used throughout the evaluation.		
1.07	When the evaluation had been completed, a draft copy was sent to the ICAEW Scheme Manager for review before completion of the final report.		
Prologue: Matters to consider before purchase			
1.08	General Overview:	Inscope-AML is a software solution designed to help subject persons comply with the FATF, EU & UN Anti-Money Laundering directives. The software is either on premis or cloud hosted & allows you to bring together in one place all the scattered information and processes associated with a manual or spreadsheet-based system, providing you with a centralised and complete view of the status of your AML risk processes and the risk classification of your customers, based on your own risk rules, policies and procedures. At InScope-AML we have made it our mission to make AML compliance and KYC onboarding simple and effective, while providing a seamless experience to your customers.	

Ref		Vendor Comments	
1.09	Supplier background:	Founded in 2017 & backed by the combined power of Cleverbit Software and Agilis IT Business Solutions, with a team of over 60 developers, as well as our experts boasting 35 years + in anti-money laundering regulations & compliance. We have created a solution which can be adapted (bespoke) to the needs of any operation, at a price which businesses of any size can afford.	
1.10	Product background and suitability for the user:	Inscope-AML alignes with Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance requirements, when implemented correctly, protect Auditors, Accountants, Lawyers, Corporate Service Providers and other regulated entities from serious consequences, such as reputational risks, as well as financial risks, possibly in the form of hefty fines. However, maintaining a robust Anti-Money Laundering system is an extremely challenging task which can be expensive and may negatively affect the customer experience	
1.11	Add-on modules:	InScope-AML is a web-based system that can be set up with different hosting options. The most common option for small organisations that cater for up to 5,000 entities (clients, beneficial owners, related parties, etc…) is a shared cloud-hosted solution that is managed by us. Larger organisations may opt to install the application on their own infrastructure or within a dedicated cloud environment. Based on the information inputed the system will prompt: CDD, EDD, request update expired documentation to be uploaded, re-run risk assessments based on change in legislation or updates in information i.e. hits on sanction checks, through the use of UN-EU, CPI, EU Blacklist & FATF lists.	
1.12	Typical implementation [size]:	Inscope-AML is accessible to firms of all sizes ranging from 500 entities and 2 concurrent users to 20 000 entities an 10 concurrent users	
1.13	Vertical applications:	There is no need as Inscope-AML handles the end to end processes during set up, & any bespoke changes required during the life of the contract between Inscope-AML & the client. When effeciency paremeters are questioned & tested, together with the client Inscope-AML will build bespoke intergrations in line with the ever changing requirements from relative authorities, & mirror the clients Risk Policy Framework at all times.	
1.14	Server platform and database:	InScope-AML can either be hosted in the cloud (AWS) or physically on the clients server dependant on the customer request & complexity of work to be carried out.	
1.15	Client specification required:	Inscope-AML creates the environment & sets said environment rules based on the clients risk framework policies & risk appetite (these rules are confirmed by the client themselves). Mandatory information (fields), compulsary information set out to successfully onboard new and existing clients and upload them onto the system. Based on the quality of the old data an optional bulk upload of User & Client Information can be carried out. Clients can make use of the all modern browsers using desktop, tablet and mobile devices subject to the practicality of the screen-size of the device. The application is fully supported on desktop screen-sizes with most features being available on mobile devices as well.	

Ref		Vendor Comments	
1.16	Partner network:	Inscope-AML has offices in Malta & London UK, Clients can contact us directly. We have a support network globally and currently support Malta, UK, South Africa, Mauritius, & Luxemborg's members end to end.	

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2.	**ISSUES AND CONCLUSION**			
Highlighted issues				
2.01	**There are a number of limitations in the product, which while not adversely impacting upon this evaluation may be of importance to some organisations. It is important that any business contemplating the purchase of software reviews the functionality described and limitations therein against its detailed requirements. Attention is drawn in particular to the following areas where the product, on its own, may not be suitable for businesses with certain requirements:**			
2.02	Findings for considerations by potential customers: (See vendor comments against the various Questions)			
*	Reports cannot be added to user menus but are avaulable via the "Segments" option which is very flexible and easy to use.			4.37
*	The platform dos not provide for scheduled reporting but there are plans for email digests in future.			4.38
*	Limited customisable branding is suported: the self-service portal can be branded but not the back-end application.			5.02
*	It is not possible to store preferences and default values on a per-user basis.			5.09, 5.16
*	The system does not allow the definition of user-defined fields, layouts and forms.			5.10, 5.13
*	Users cannot save the parameters of searches. However it would be posisble to use a "segment" for this instead.			5.14
*	The help-text is not editable by the end-user. There is no traditional 'manual', but instead on-line Help topics and a search option..			5.22, 7.50
*	ESCROW is not provided. Note that this is not unusual for this sort of software [subscription] service.			5.23
*	Service credits are not provided should the system be unavailable.			5.33
*	There is currently no live links provided between the software and other packages inc links to spreadsheets. However, there is the ability to export to Excel.			5.41, 5.42 5.46
*	The supplier has a test environment; used to test software changes. This is not offered to SaaS users of the platform but is available to on-premise customers.			6.14 6.62-6.64
*	No SLA is provided relating to service availability or guarantee on data recovery.			6.28
*	No ability for SaaS customer to specify or take their own backups; although on-premise customers can do this. However, InScope can restore data for SaaS customers on request.			6.51 6.52
*	Only English is currently supported.			7.04
*	The InScope platform does not provide "Firm" Risk Assessments; its focus is "Client" Risk Assessments. However, the system is configured in accordince with the Firm's policy when setup for the customer.			7.20, 7.21
*	The system cannot currently provide third-party verification services from within the platform; but this is planned feature.			7.22
*	The platform does not provide AML training.			7.35-7.39
*	The platform does not provide a "Firm" AML policy template or "Firm" AML risk assessment.			7.41-7.65
*	The platform does not provide integrated client identity checking. It does allow documents to be saved against the Client Risk Assessment.			7.99- 7.121
*	The platform does provide functionality to allow internal referral of a clent to the firm's MRLO.			7.122
*	The user (Accountant) is not able to share a dashboards with their client.			7.125
Evaluation conclusion				

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2.03	For the specific use-cases in support of accountancy firms complying with their AML (Anti-Money Laundering) obligations it is a solid and capable solution. It continues to be actively developed and enhanced. Members should be aware of the considerations listed above, and fully understand the role that it can play in an engagement. * NOTE THAT THE QUESTIONNAIRE RELATES TO THE SOFTWARE PRODUCT AND NOT ANY SUPPLEMENTARY SERVICES PROVIDED BY THE SUPPLIER TO THE ACCOUNTANCY FIRM USING THAT PRODUCT *		
2.03a	InScope state that their platform integrates with open source sanction lists published by the UN, HMT and EU, and this is available free of charge with the subscription but no checks are carried out against PEPs/barred directors at this stage. Note too that InScope's FAQs they specifically state that: "You are always responsible in ensuring that the way InScope-AML is configured and the processes you define around its use are in line with local legislation."		
Disclaimers			
2.04	Any organisation considering the purchase of this software should consider their requirements in the light of proposals from the software supplier or its dealers and potential suppliers of other similarly specified products. Whilst the contents of this document are presented in good faith, neither ICAEW, nor the ICAEW's Technical Manager (RSM UK Consulting LLP or any party nominated by the ICAEW to perform this role on the ICAEW's behalf) will accept liability for actions taken as a result of comments made herein. The decision to purchase software resides entirely with the organisation.		

Ref	Requirement	Vendor Response	Reviewer Comments
3.	**<u>ACCESS AND SECURITY</u>**		
Access control			
3.01	What security features are included to control access to the application?	The system does uses third-party industry standard authentication providers (Google, Microsoft Personal Accounts, Azure AD, Active Directory). Authentication is carried out in these third party systems and then the users are authenticated into InScope-AML via OpenID. We also have additional controls based on IP addresses (for example, users can ask us to lock their envrionment to their IP address; our SaaS offering blocks suspicious IPs).	Noted
3.02	Can access to functions be managed via a permissions matrix so users can only see (in menus and other links) and access those areas they are authorised to access?	Yes. The system offers different permissions and administrators can select what users get what permissions. When a user logs in, the user interface options will be limited to the permissions the user has. For example, some menu items may not be displayed or buttons that perform certain actions are disabled/hidden if the user does not have access to the functionality.	Confirmed; mix and match of a wide range of roles, inc covering workflows, client take on, risk assessments, GDPR-related, and account-related.
3.03	Is this access to the application managed by:- - Individual user profiles? - User groups or job roles?	It can be managed at both levels - either at a user group level or at a user level.	Confirmed
3.04	Can a report be produced detailing all current users, their user groups if relevant, and their authority levels and/or access rights?	Administrators can access	Noted
3.05	If menus can be tailored does the system limit the display of menu options to those for which permission has been granted for each user?	Yes, for example the "Settings" menu item is only available for users who have the "Administration" permission.	Confirmed
3.06	Does security allow for access to be limited to: - Read only? - Read/write? - Read/amend/delete?	Yes, there is one permission level for Read and another for Edit. For deletions, there are different permissions for "moving to the recycle bin" or permanently deleting data.	Confirmed
3.07	If data can be accessed by separate reporting facilities, such as ODBC or an external report writer, is the user access security control applied?	Yes, data can be accessed via a REST API. The API functions use the same access control as you would get via the user interface.	Noted
3.08	Does the system security integrate with Microsoft's Active Directory or other tools that provide a single sign-on?	Yes, the system supports integration with Azure AD, login with personal/corporate Microsoft/Google accounts. For on-premise installations, the system supports integration with Active Directory.	Noted
3.09	Does the system provide multi-factor authentication (MFA)?	Yes since autentication is done via Microsoft/Google accounts, MFA is supported. Moreover, MFA can be enforced by the client's IT department if integrated into Azure AD.	Confirmed
Passwords and access logs			
3.10	Is access to the software controlled by password?	Access is done via authentication with Microsoft/Google/ActiveDirectory which is usually controlled via a password. InScope-AML does not store or manage user passwords directly though.	Confirmed
3.11	Does each user have a separate log on (user id)?	Yes	Confirmed
3.12	If there is no password facility please state how confidentiality and accessibility control is maintained within the software?	As per above, via OpenID authentication using third-party providers.	-
3.13	Are passwords masked for any user logging in?	Not applicable.	Confirmed
3.14	Is password complexity available and enforced?	Not applicable, but if the system is integrated into the client's Azure AD environment, access to InScope-AML would be governed by the same password policies enforced by the client's IT team.	-
3.15	Are passwords encrypted?	Not applicable.	-
3.16	Are users automatically logged off after a pre-set idle time? ~~not using the system?~~ - Can the time period be changed? - Can any information be viewed without being logged in, including after logging off, if so what information?	Yes, users are automatically logged off after a period of inactivity. This period is not configurable for our SaaS offering but can be set differently for on-premise environments. No information can be saved into the system without users being logged in.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
Deletion of transactions			
3.17	Is it possible to delete a transaction?	Data can be deleted. Some "transactions" such as "approving a risk assessment" or "dismissing sanction hits" cannot be deleted directly.	Noted. Inscope is not a transactional system in the traditional sense.
3.18	If so, then how are deletions controlled by the system?	Deleting a record (e.g. individual file) or a document uploaded into InScope requires two levels of deletions (i.e. use of recycle bin). Users may be set up to be restricted to only the first level of deletion.	Noted
3.19	Are deleted transactions retained in the audit trail (see below) and denoted as such?	Yes all data related to deletions is maintained unless users with elevated permissions carry permanently delete that (a feature that is required for GDPR purposes).	Noted
Audit trails			
3.20	Does the system have an audit trail (log) which records all changes to transactions in the system?	Yes, updates are logged at different levels. All updates are logged within an API audit trail and changes to client data is also logged separately in formats that are easy for users to view via the UI.	Confirmed. Detailed trail held, with full filtering of results if required for searching.
3.21	Does this log also record any system error messages and/or any security violations?	Yes, system errors and access denied errors are logged separately.	Noted
3.22	Is it possible to turn off or delete the audit trail?	No	Noted
3.23	Does the software allocate a system generated sequential unique reference number to each transaction in the audit log, date and time stamp it and record the user id?	Yes	Noted
3.24	Are all master file changes recorded in the audit trail?	Yes. There are different types of audit trails. Changes to client data including client details such names, addresses, custom fields, services provided, etc... together with changes to the client's related parties structure (e.g. changes to shareholders, UBOs, directors, etc...) are logged in an audit trail and made available to users via the user interface history screens. Changes made to rules, segments, country categories, settings, etc... are also recorded in an audit trail which includes user details and timestamps. Not all this information is accessible via the user interface but the audit trail is still maintained.	Noted
Compliance			
3.25	Does the system operate in a way that is compliant with data protection legislation including GDPR? How does the system facilitate this?	We provide features to permanently delete data. At a contractual level, we also have a data protection agreement that is signed governing all aspects of GDPR (e.g. use of sub-processors). Please refer to sample DPA agreement.	Confirmed. This is shared with clients if/when requested.
3.26	Describe your use of sub-processors if any?	We do not have a lot of sub-processors with our biggest sub-processor being our parent company, Cleverbit Software. Our other sub-processors are the cloud service providers (AWS and Microsoft for backups). All sub-processors are based in the UK or EU and we have signed DPA agreements with them. All sub-procssors are listed in our DPA agreement with clients.	Noted
Backup and recovery			
3.27	Is there a clear indication in the software or manuals as to how the data is backed-up and recovered?	For our SaaS offerring, we have a technical document that explains various technical elements of the system, including our approach to backups, backup location, frequency, secruity and disaster recovery processes.	Noted. This is shared with clients if/when requested.
3.28	How often are backups taken and to what point can restores be done?	Backups are taken once a day and everytime we carry out a release.	Noted
3.29	How does the software facilitate recovery procedures in the event of software failure? (E.g. roll back to the last completed transaction).	Most calls to the API are atomic. When integrating with third-party systems, atomicity can not be guaranteed. In the worst case scenarios (e.g. integration with StartKYC), partial failures generate warnings that ask users to contact our support team for us to determine whether it is safe to retry the transaction.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
3.30	If software failure occurs part way through a batch or transaction, will the operator have to re-input the batch or only the transaction being input at the time of the failure?	N/A - There are no batch processes that users can run.	-
3.31	What features are available within the software to help track down processing problems?	Error messages are accompanied by a unique code that can help us identify the logs generated during that transaction.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
4.	DATA PROCESSING AND REPORTING		
Input and validation of transactions			
4.01	Is data input controlled by self-explanatory menu options?	Yes	Confirmed
4.02	Are these menus user/role-specific?	Yes, for example "Settings" is only available to users with "Administrator" role	Confirmed
4.03	Can the creation or amendment of standing data (e.g. customer account details) be undertaken using menu options or dialogue boxes as opposed to requiring system configuration?	Yes, a lot of options such as lists of services, delivery channels, country categories, etc… can be modified by administrators via the user interface.	Noted
4.04	Does the software provide input validation checks such as: - [account] code validation? - reasonableness limits? - validity checks?	Yes, validation is implemented for various inputs to ensure textbox length limitations are not exceeded, that numbers and dates are within reasonable ranges, etc…	Noted
4.05	What control features are within the software to ensure completeness and accuracy of data input?	Important fields are marked as mandatory and validations are carried out to ensure all mandatory data is supplied; other logic checks are implemented (e.g. passport numbers being unique; risk scores being within range; number of shares allocated never exceed 100%); where applicable drop down boxes are provided to ensure data is accurate (e.g. countries/nationality).	Noted
4.06	How does the software ensure uniqueness of the input transactions? (i.e. to avoid duplicate transactions)	Uniqueness is enforced on identification numbers (passport numbers, company registration numbers, etc…) combined with the country where these numbers are registered.	Noted
4.07	Is data input by users validated by scripts or routines in the browser, or other client software, before transmission to the server?	Yes, while all validation is checked server side, most validation is also checked on the client side (some exceptions include uniqueness checks which are only checked server-side).	Noted
4.08	Is data input by users validated by routines running on the server before data files are updated?	Yes, even for functions that are validated client-side, server side checks are always done.	Noted
4.09	Does the above validation ensure that data entered in all input boxes: - Cannot be longer than a maximum length? - Cannot contain unaccepted characters such as semi-colons etc?	Maximum length validation is carried out; validation on numeric values and dates is also carried out. Checking for unaccepted characters is rarely required.	Noted
4.10	Are responses to erroneous data input clear so that they do not lead to inappropriate actions?	Yes, when data is not valid, the message explaining the error is displayed and the violating data field highlighted in red.	Noted
4.11	Does the software have an automatic facility to correct/reverse/delete transactions?	Aspects of the system that are transaction based (e.g. customer risk assessments, dismissing sanction hits, etc…) cannot be deleted. However in such cases, users can create another transaction to override the erroneous entry.	Noted. And thus noted in the audit trail.
4.12	If yes, are these logged in the audit trail?	These transactions cannot be deleted.	Noted
4.13	Are all data entries or file insertions and updates controlled to ensure that should part of a data entry fail the whole transaction fails?	In most cases yes. Were this is not possible (e.g. integration with third parties such as StartKYC), the users may be asked to contact support for us to check which part of the transaction failed.	Noted
4.14	Are messages provided to users clearly explaining whether the data entry or file upload has been processed successfully or not?	Yes, error messages are always displayed on failures. Successes are either communicated via appropriate messages, or via the user being re-directed to an appropriate page (e.g. on creation of an inidivdual, upon saving, the user is redirected to the individual's dashboard showing all data that was input).	Noted
Import and export of data			
4.15	Can files/attachments be uploaded and stored against any transaction?	Files can be uploaded against the client (not against a transaction).	Confirmed. Document requirement can be made mandatory and subject to expiry too. Documents can be stored in a client's own repository if rquired (eg SharePoint).

Ref	Requirement	Vendor Response	Reviewer Comments
4.16	Is there an additional charge made for storage of uploaded files? - If yes, please indicate the cost.	We have a 5GB limit on the amount of documents that can be uploaded. No client on our SaaS envrionment has exceeded this so we do not have a price list for this yet.	Noted
4.17	Can data be imported into the system from multiple types of files, e.g. XLS, text, CSV?	Data can be exported to XLSX from a number of screens.	Noted
4.18	Explain how the system validates imports into the system and what happens to any import which fails?	N/A - no batch imports are supported. In terms of importing data from the self-service portal, this data is presented to back-end users for verification before being accepted into the system.	Noted
4.19	Are imported /interfaced transactions detailed in the audit trail? *[See also 3.27]*	N/A - as per above no batch import functionality is provided.	-
4.20	Can data be exported from all areas of the system to multiple formats e.g. XLS, CSV, PDF, text; if so specify which formats are supported?	At the moment XLSX is supported from a select number of screens (e.g. segments, and some reports/dashboards).	Noted
Data processing			
4.21	Does the software ensure that menu options or programs are executed in the correct sequence (e.g. outstanding transactions are processed before month end is run)?	The system is resilient to processes running in any order. For example, if a Customer Risk Assessment (CRA) is carried out and then the user changes the company structure resulting in a different risk scoring, the system generates a warning for the user to run a new CRA. Having said so, in the latest version of InScope-AML we generate warnings recommending that users to complete a user profile before running a CRA.	Noted. The inbuilt workflow is designed to aid the user here.
4.22	Does the software provide automatic recalculation, where appropriate, of data input? (e.g. VAT)	Given this is not financial software, this is not as applicable. However, we do have an automatic end of day routines that checks that all risk rules have been applied across the whole database. If problems are found, these are fixed immediately (e.g. if a warning around missing data is missing, it will recreate it) or in case of issues that cannot be fixed (e.g. communication issues with a third-party service), a warning is generated on the home screen dashboard.	Noted
4.23	Is a month/period-end routine required to be undertaken?	No, there is no concept of such routines.	Noted
4.24	Is it possible to delete accounts if the balance is Nil but transactions have been recorded against the code?	N/A	-
4.25	What is the size and format of reference numbers and descriptions within:- - Ledgers? - Stock? - Currencies?	Reference numbers can go up to 2^63 (9223372036854775808).	Noted
4.26	How does the software guard against/warn about duplicate account numbers on set up?	Not relevant in terms of account numbers but the system generates warnings in case of duplicate company registration number or identification documents issued from the same country.	Noted
4.27	How does the software enable the traceability [from, to and through the accounting records] of any source document or interfaced transaction?	N/A	-
4.28	What drill down/around functionality is available within the software?	For dashboard reports showing numerical values, users can drill down to see the list of clients/entities represented by the value.	Confirmed. Full drill through is supported.
4.29	If the software uses a lot of standing information which changes frequently or regularly, does the software allow for such changes to be effected through the use of parameters or tables?	Standing data can be changed via the user interface itself.	Noted
Report writer			

Ref	Requirement	Vendor Response	Reviewer Comments
4.30	Does the system have an in-built report generator or is a third-party solution used (if so please specify)?	We have a lot of options around reporting including: a) ***Segment Reports*** generating a list of clients filtered by user-defined criteria; b) ***Dashboard Reports*** - a list of reports that provide a lot of statistical data, which can again be filtered by user-defined criteria; c) ***List Reports*** - a list of clients/UBOs/officers. In terms of (c) we are currently working on enhancing this reporting feature to allow users to create report templates and select the columns to be included in the reports. All reports are displayed on screen and exportable to Excel.	Noted
4.31	Is the report writer based on a standard SQL-type approach and is it flexible and easy to use?	The interface allows the definition of filters specified in a user-friendly manner that requires less technical knowledge than SQL.	Noted
4.32	Can the report generator operate over the financial and operational aspects of the system, e.g. combining service metrics with financial information?	N/A	-
4.33	Is a comprehensive data dictionary provided to aid field selection?	The user interface allows users to filter fields by user-friendly names with drop downs and auto-complete textboxes so no data dictionary is required.	Noted
4.34	Does the system provide a library of reports and templates which can be amended, saved and re-run?	Yes, a list of pre-defined segments are created which can either be used to run Segment Reports (e.g. "Serviced Clients", "Beneficial Owners", etc...) or used to filter Dashboard Reports and List Reports.	Confirmed. A segment comprises a number of filters. A segment can then be applied to a standard report.
4.35	Can users create their own reports? If so, what are the controls on users doing this?	Administrators can create Segment Reports using the user interface and these reports can then be run by any user. We are also working on users creating their own List Reports and this will be enabled for any user.	Confirmed.
4.36	Can users create saved searches /filters / queries?	Yes for Segment Reports. We are working on a feature to support this in List Reports as well.	Confirmed
4.37	Can regular reports be added to user menus in the appropriate area of the system?	Not in the main menu - Reports can be accessed via the Segments or Reports menu options.	Confirmed. Very flexible and easy to use.
4.38	Does the system support the production of on demand (interactive) and scheduled batch reports?	No but we have plans for new features in the new year that will generate email digests that can be used to send daily/weekly lists of tasks due/overdue.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
5.	**USABILITY**		
Ease of use			
5.01	Does the solution provide a multi-language user interface?	No, the system is only available in English.	Confirmed
5.02	Does the system allow for customizable branding and UI (e.g. corporate colour palate, upload company logo, etc)?	The self-service portal can be branded but not the back-end application itself.	Noted
5.03	Does the system have a similar look and feel and overall and consistency between screens and modules?	Yes, in fact most user interface components are re-used across different screens.	Confirmed
5.04	Is data entry easily repeated if similar to previous entry?	When an individual is assocated with mutliple companies (e.g. s/he is a shareholder of more than one client company), the individual details need only be input once and then the individual record is associated with the company. This means that if the individual details change (e.g. the individual becomes a PEP), this change automatically effects all related companies.	Noted
5.05	Does the software prevent access to a record while it is being updated?	No records can be retrieved while other users are updating it.	Noted
5.06	Is there locking at file or record level?	We use optimistic concurrency where records are not locked but in the rare cases a record is updated simultaneously by two users, the second user will be shown an error and asked to submit their changes again.	Noted
5.07	Does the software allow for the running of reports whilst records are being updated?	Yes	Noted
5.08	Can timestamps or user comments be added to transactions?	The only "transactions" within InScope are Customer Risk Assessments and dismassal of external search hits (e.g. sanctions). In this case, we do record timestamp and the user who carried out the action and also allow users to add comments (in some cases comments are mandatory).	Noted
5.09	Is there the ability to store preferences and default values on a per-user basis. e.g. department/team/user?	For our premium clients who have larger data sets, the datasets can be divided by team and users can then filter screens by team. The preferred team used to filter by default is stored as a user-defined preference. Other preferences are account-wide.	Noted
5.10	Does the system have the ability to provide user-defined fields with associated validation of data input?	The system provides a lot of different user-defined field options including the ability to define questions that can only contain Yes/No answers, questions that allow users to pick from a user-defined list or countries. Administrators can also specifiy whether these fields are mandatory or not in different scenarios.	Noted. This relates to the Risk Assessments rather than generaly within the system.
5.11	Can the system provide users with reminders and notifications e.g. workflows?	Yes, the home screen contains a list of pending/overdue actions.	Confirmed
5.12	If the system provides workflows, does it have functionality to substitute/delegate authorisations?	Items are assigned to teams or users who have permission to carry out certain tasks so there is no need to re-assign to someone else.	Confirmed. All handles by the 'group' setup in the permisiosns matrix.
5.13	Is there the ability for users to define and configure layouts of letters and forms?	Layouts cannot be changed but the content (i.e. what questions are asked) can be changed within different screens and within the self-service portal.	Noted
5.14	Can users save the parameters of searches?	No, parameters cannot be saved.	Noted. Actually could use a "segment" for this.
5.15	Does the system have a "universal search" option, allowing a search to be undertaken over all modules of the system?	No but users can search across all companies or all individuals.	As 5.14
5.16	Can the system store menu option 'favourites' on a per user basis?	No	Noted
5.17	Can a user open multiple windows accessing the same or different modules of the system?	Yes	Confirmed
5.18	Can more than one software function be performed concurrently?	Yes, providing these are being done in different browser windows/tabs.	Noted
User documentation and training			

Ref	Requirement	Vendor Response	Reviewer Comments
5.19	Is the manual provided as: - hard copy - on CD - by download - via a web-interface?	Usage of key features are documented online at https://docs.inscope-aml.com	Confirmed. Screen shots and videos are provdied. Detailed noted where required, e.g. user levels.
5.20	Does the manual include: - An index or search facility? - A guide to basic functions of the software? - Pictures of screens and layouts? - Examples? - A tutorial section? - Details of any error messages and their meanings?	A search functionality is provided. Basic functions are listed and grouped by section. Some help articles do have screenshots and some even short video clips.	Confirmed. Embedded within the system. Help gives a list of topics matching the query.
5.21	Is context-sensitive help available within the system?	No	Noted, but a search option is provided.
5.22	Is the manual and/or help editable by the user (subject to the permissions matrix)?	No, but administrators can add help text to any user-created custom field.	Noted
5.23	Will the Software House make the detailed program documentation (e.g. file definitions for third party links) available to the user, either directly or by deposit with a third party (ESCROW)?	No	Noted and not unusual for this sort of system.
5.24	Please detail the training options available?	We provide two training sessions during client onboarding. This is included within our one-time fee structure. The first training session guides the user through day-to-day operations by inputting a client file together. The second training session is targetted at administrators and revolve around the system configuration and maintenance. Additional training sessions can be provided on request.	Noted
5.25	Who provides training: - Software House? - VAR?	We provide training ourselves.	Noted
Support and maintenance			
5.26	How is the software sold: - Direct from the software house? - Via a Value Added Reseller (VAR) or Integrator?	Direct	Noted
5.27	How is the product supported: - Direct from the software house? - Via a Value Added Reseller (VAR) or Integrator?	Direct	Noted
5.28	Do VARs have to go through an accreditation process?	N/A	-
5.29	Is the software sold based upon number of named users or a number of concurrent users?	Number of concurrent users and number of entities that can be added to the system.	Noted
5.30	The supplier should detail the support cover options available, covering: - The hours provided? - Associated costs? - The global regions covered?	We provide support during UK/EU business hours (9:00 to 17:00). Depending on the package purchased, clients get a number of free support hours per year, after which support is charged as per contract rates. At the moment our rate is GPB 60/hour.	Noted
5.31	Detail the process by which customers raise support requests and how these can be viewed/managed?	We have a support portal at https://inscopeaml.freshdesk.com/ which can be accessed via a web browser or by sending an email to support@inscope-aml.com	Noted
5.32	Please note the methods of support available: - Telephone? - Internet chat? - Remote access to customer workstation? - Other, please specify?	Support requests can be initially created via email or our support portal. Telephone/Microsoft Teams calls can then be set up if needed.	Noted
5.33	Do you offer service credits for failure to meet performance around SLA and uptime (if applicable)	No	Noted
5.34	What is your escalation path for tickets which have not been resolved within a reasonable time?	Our support team monitors requests constantly and our CX manager personally reviews the status of all tickets with the support team on a daily basis.	Noted
5.35	How often are general software enhancements provided?	We do not have a fixed schedule but on average we release 1-2 upgrades every quarter for our SaaS clients. Clients using on-premise installations get updates at a less frequent rate. A historical summary of past versions is available here: https://inscope-aml.com/category/updates/	Noted. Full list of updates is published on the website.

Ref	Requirement	Vendor Response	Reviewer Comments
5.36	Will they be given free of charge?	Updates are free, but may include new premium features that would require a change to the licencing agreement / additional charges. Clients would have an option as to whether to upgrade their licence or not.	Noted
5.37	How are enhancements and bug fixes provided to customers?	For our SaaS clients, these are done automatically, usually outside office hours and clients would receive a notification within the application itself about the upgrade on first login. This notification would have a link to the release notes posted on our website.	Noted
5.38	Is "hot line" support to assist with immediate problem solving available?	No, the quickest way is to contact our support desk via email.	Noted
5.39	If so, is there an additional cost involved?	N/A	-
5.40	At what times will this support be available?	N/A	-
Integration and www facilities			
5.41	Can the software be linked to other packages e.g. word processing, graphics, financial modelling, to provide alternative display and reporting facilities?	Not a live link; but data can be exported to Excel for further filtering/reporting.	
5.42	Can definable links to spreadsheets be created?	N/A	-
5.43	Does the system provide a secure document storage capability: If so, please give examples of the document types saved and what transactions these might relate to.	Yes, for our SaaS clients documents are usually stored in Amazon S3 buckets and are encrypted and replicated across two EU regions. Administrators can configure what documents can be uploaded and in what scenarios they are mandatory. In terms of file types, these are restricted to a minimum set.	Noted
5.44	Can documents be scanned into a secure repository?	Not directly - they would need to be scanned and then uploaded manually.	Noted
5.45	Does the system provide data migration tools for transactional and master data sets (e.g. employees customers, suppliers, journals, invoices).	Yes, we offer the option for us to assist you with migrating client data from a spreadsheet into the system. This is done via spreadsheet templates we can provide to our clients during onboarding.	Noted
5.46	What connection mechanisms does the software have and what breadth of functionality in terms of: - operations (add, update, delete)? and - what transactions/data it can access? E.g. if webservices APIs available, then can customers connect to whatever software they wish?	Yes, all operations that can be carried out via the web interface can be carried out via REST web services. The most popular web service endpoints are documented here: https://app.inscope-aml.com/docs	Noted
5.47	Does the system support mobile working?	While most features work well on mobile, the system is not routinely tested on mobile devices and there may be some features that might not work properly (e.g. building structure charts). The recommendation is to use desktop browsers.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.	SAAS/HOSTED OPERATION		
	This evaluation covers the system but not the method by which it is delivered and/or contracted for. Potential users need to satisfy themselves on the security and disaster recovery aspects and licensing of the online system and any data protection issues of their own and customer/supplier information, contained therein, being held on the system, as well as the return of the data when the contract expires or is terminated.		
Data centres and customer data			
6.01	Whose data centres are used and where are these located: - If hosted -- where data centre controlled by a third-party? - If SaaS -- where the software vendor will be in control?	Our data is hosted on Amazon AWS services deployed in Frankfurt and Ireland. We also make use of Microsoft SharePoint services for some backup files (located in the EU).	Noted
6.02	Does the customer get a choice of the jurisdiction in which their data resides?	Not under our basic packages. For larger organisations, we do offer the option to deploy a private environment. In this case, yes that is supported.	Noted
6.03	What certification(s) do you or your platform operators hold relating to your data centres and your business operations?	N/A - we use AWS as a platform. (https://aws.amazon.com/compliance/iso-27001-faqs/)	Noted
6.04	Do you or your platform operator have an SSAE16 (System and Organization Controls) report available?	N/A - we use AWS as a platform.	Noted
6.05	What are the physical controls over the:- - Premises? - Fileservers? - Communications equipment?	We do not have access to physical premises or servers because cloud data is held by AWS in their secure data centres. Remote access to the environment is restricted by our office IP. Our offices have an alarm system & CCTV.	Noted
6.06	Is the space in this/these data centre(s) shared with any other companies?	Our AWS environment is only used by InScope-AML but we do not have control over underyling infrastructures.	Noted
6.07	Is data for different customers/companies kept:- - On separate servers? - In different databases? - In separate database tables? - In a database with data for other customers and companies using logical security to partition customers' data?	We deploy a separate database for each client hosted and served via shared SQL servers (i.e. multiple client databases on the same server). In terms of document storage in S3, at the moment data for different clients is stored in separate S3 buckets. However, we are planning to transition to locigal partioning in line with AWS recommended best practices for using S3 storage at scale.	Noted
6.08	How is it ensured that data for different customers and companies is reliably identifiable and only accessed by authorised users for each customer/company?	We use OAUTH tokens to identify users. Tokens includes information that allows us to determine what client database we need to connect to.	Noted
6.09	What controls are in place to prevent users from one customer/company accessing data from another customer/company by accident or by design?	Once an OAUTH token is generated during login it can only be used to generate queries against one database so no data from other client databases can be retrieved/updated.	Noted
6.10	How is [Internet] communication traffic monitored to identify potential problems before they happen: - From a performance perspective? - From a security standpoint?	AWS Web Application Firewall (WAF) is configured to filter out malicious traffic; automated uptime monitors are set up to confirm web applications are running.	Noted
6.11	What procedures are in place to prevent a break in Internet Connection (at the server, client or in between) from causing data corruption?	Most server operations are atomic so no data corruption can occur. In terms of long-running server-side processes, these processes can be re-run in case of failures during the first run, fixing any data that is corrupted. For example, we have a process that checks clients against sanctions and if this fails halfway through, the process is configured to run again automatically - any client that is already checked is checked again but the results would be found to be the same and no hits are updated in our database.	Noted
6.12	Are communications between the user’s computer and the software service encrypted: - User log in data only? - All data exchanged between user client and software service?	SSL is enforced across the board and all data exchanged is encrypted.	Noted
6.13	Is data on your servers encrypted at rest?	Yes, all VM hard disks are encrypted at rest and S3 buckets are also encrypted at rest.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.14	Is a test environment provided to test configuration changes? If so, is there an additional charge for this?	We don't have any set plans for this, mainly because we have not been asked to provide this by our existing cloud-based clients. For on-premise clients who have requested this, we do allow them to test these features prior to release. Depending on their setup, we may charge extra for this (e.g. GBP 20/month).	Noted
Access to customer data			
6.15	What are the implications of the Data Protection Act over information held by the hosting service provider, and how does the vendor mitigate these?	Our clients are data controllers who input data collected by themselves from their client base. This data could include sensitive information and we are aware that we are processors of such data. In this regard, we have a DPA that is part of our contract with the client that stipulates the data stored, our responsibilities, our sub-processors, etc..	Noted
6.16	Are you subject to any legal or regulatory requirements obliging you to retain a copy of customer data?	No	Noted
6.17	Who will be able to access or see customer data?	Data can be accessed by our clients (i.e. an accountant would have access to all the data about their clients). If the self-service portal is used and the accountant opts to ask the client to complete their profile, the data related to that client is made available to the client himself/herself via the self-service portal. Our support team also has access to the data for support purposes.	Noted
6.18	Explain the procedures to prevent unauthorised access from staff, or contractors, working for the service provider or any other people with access to the service provider's internal systems.	Various levels of security/clearance including access being available only to support personnel and access only available via our office network.	Noted
6.19	Explain the release management procedures in place and the associated segregation of duties ?	All releases are first intalled and tested on a staging environment. The process to release to production includes automated steps to back up the data prior to upgrades in order to ensure no data is lost.	Noted
6.20	Is there sufficient segregation of duties preventing system developers from accessing and changing live applications and data files?	Yes, only support personnel have access to such environments for support purposes. While some developers also provide technical support, not all developers have acecss.	Noted. The developers who have access are those invloved in technical support.
6.21	Explain the review and approval procedures covering system operations staff when emergency changes need to be made to live applications and data?	We have a small application that is used to upgrade the system (used in cases of both major releases as well as patches) that keeps a log of changes done to each environment (i.e. we can download a copy of the version released on a particular date to a particular server).	Noted
6.22	Is an audit trail always maintained of these emergency changes?	Yes, as per above.	Noted. This audit trail is internal to the support desk rather than for the client to access.
6.23	What procedures are in place when members of staff leave to ensure that their system access is stopped?	Manual checklist in place to close off access.	Noted
Platform and service levels			
6.24	Which databases can be used (Hosted) or are used (SaaS)?	MS SQL	Noted
6.25	What forms of user authentication are supported e.g. user names, passwords certificates, tokens etc.?	Authentication is done via OAUTH with third party providers (Microsoft/Google) such that users log in using their personal or corporate Microsoft/Google accounts. Client environments can be locked to a single Azure AD tenant.	Noted
6.26	What is the proposed product/service availability percentage?	We do not provide any availability guarantees Scheduled downtime is carried out outside business hours and issues related to service being unavailable is classified as a high priority request within our SLA. We also have tools monitoring availability such that we can react to this prior to being notified by clients.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.27	What percentage availability has been achieved over the past 12 months?	Since 20th February 2022, the uptime availability of the application was 99.855%. This includes scheduled downtime, out of office hours. Uptime availablity during office hours was 99.996%. The average unscheduled downtime was 7.6 minutes; the average unscheduled downtime during office hours was 5.7 minutes.	Noted
6.28	Is a service level agreement ("SLA") offered regarding: - Service availability? - Data recovery?	Our SLA defines response times and resolution times based on severity but does not provide any guarantees on data recovery. Data recovery procedures are defined within our "InScope-AML Technical Overview - Cloud Hosted Environment" document. Refer to sample Services Agreement.	Noted
6.29	Is the service available 24x7 or are there downtime periods for maintenance?	No, but maintenance is carried out outside office hours, usually during the night and/or weekends.	Noted
6.30	Is the customer made aware of maintenance periods in advance?	We have a notification system within the app itself and we have have recently used it to push notification about planned maintenance, but we don't have a policy for when to use this at the moment. The alert pops up on screen upon login and can be dismissed or "snoozed" such that it pops up again on next login.	
6.31	Does the application software:- - Require any client software to be installed on the user's computer? - Work entirely within Internet Browser software on the user's computer?	Application works entirely off a web browser.	Noted
6.32	Where the product/service relies upon downloading and running an executable program, has that program been secured with a digital certificate to verify the source and integrity of the program?	N/A	-
Platform security			
6.33	What security steps are taken to prevent and detect intrusion attempts?	Remote access to the environments for support purposes are restricted as follows: a) All services are only accessible from within the office IP or for remote workers logging in through our intranet via VPN b) High-level access to the AWS portal is restricted to senior employees within the organisation c) Login attempts to AWS are logged with notifications sent out for invalid attempts.	Noted
6.34	Is firewall hardware and software used to protect the live systems from unauthorised access?	Yes, we use AWS Web Application Firewall (WAF) which is configured using AWS rulesets to protect against a wide range of attacks.	Noted
6.35	Which monitoring software is used to create alerts when intrusion attempts are suspected?	We use AWS notifications (CloudWatch & SNS).	Noted
6.36	Are designated staff responsible for receiving and urgently responding to these alerts?	Yes	Noted
6.37	Have clear procedures been established for identifying and responding to security incidents?	Yes	Noted
6.38	Is all security sensitive software, such as operating systems and databases, kept up to date with the latest software patches? Please indicate how regularly updates are applied.	Operating Systems are kept up to date, with a manual restart of the server to apply Windows Updates carried out (out of office hours) at least once every 3 months.	Noted
6.39	List the procedures and software tools in place to prevent or detect and eliminate interference from malicious code, such as viruses?	Windows Defender on Windows servers	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.40	Is a system log maintained by the service provider that details - User access? - User activity? - Error messages? - Security violations?	AWS portal logins are logged with notifications sent on invalid attempts. These are logged via AWS Cloud Watch with a retention policy that is set to "Never Expire". Access at the application level is also logged and all user updates are logged. These are logged in the application database. These logs are not deleted but are periodically archived to AWS S3 buckets. Invalid credentials when accessing the application cannot be logged since authentication is done via third party tools.	Noted
6.41	Is this log available to the customer?	Users can review who is currently logged in and last login made by a user. A full log cannot be retrieved from the user interface but can be provided upon request.	Noted
6.42	Have there been any successful unauthorised access attempts been made during the last year? If Yes:- - What was the effect on the business and users? - What steps are in place to prevent this happening again?	No	Noted
6.43	Is penetration testing regularly carried out by (please indicate frequency of tests): - Staff specialising in this field? - External specialists?	We run a security testing exercise using OWASP ZAP once a year.	Noted
6.44	If penetration testing by a specialist is not performed regularly, please indicate the main procedures in place to identify weaknesses?	See above.	Noted
6.45	Are security procedures regularly reviewed? Please indicate frequency of reviews.	The security tests are reviewed and carried out once a year.	Noted
6.46	What security reporting is provided demonstrating compliance against certification(s) and policy(ies)?	This level of security is provided via AWS compliance to ISO standards as documented here: https://aws.amazon.com/compliance/iso-27001-faqs/	Noted
6.47	Are any security breaches communicated to customers?	Yes, in terms of our Data Breach policy, clients whose data has been compromised, are to be informed immediately.	Noted
Backups by the service provider			
6.48	In relation to backups undertaken by the system provider please explain: - How is a customer's data backed up? - How often is this undertaken? - What is backed up? - What's the media used? - Where are backups stored? - How many copies are there? - How long are they retained for? - Who has access to them? - Is the data encrypted?	Backups are carried out once a day, encrypted and uploaded to a separate cloud environment. A copy is retained on the local server while a copy is retained on the cloud. Backups are kept for 10 days.	Noted
6.49	How frequently is a test-restore of backups undertaken?	Once every 3 months.	Noted
6.50	Can the provider restore from a backups that it has taken at a customer request?	Yes	Noted
6.51	Does a customer have the ability to undertake their own backups?	Not on our cloud environment.	Noted
6.52	If so, can a customer restore data a backup that they have taken?	We can do this upon request.	Noted. Can restore an individial client's instance if necessary.
Platform recovery			
6.53	What contingency plans are in place to enable a quick recovery from: - Database or application software corruption? - Hardware failure or theft? - Fire, flood and other disasters? - Communication failures?	The more common scenarios are resolved by AWS (e.g. any physical disaster, communication issues, etc...) Worst case scenarios may require a rebuild of the server (we have images that can be used for this) and databases restored from backups.	Noted
6.54	How often are these plans tested?	Procedures for the most common scenarios (database restores) are tested quarterly.	Noted
6.55	How often are these plans reviewed and updated?	Yearly	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.56	What are your: - Recovery Point Object (RPO) standards? - Recovery Time Objective (RTO) minimum standards?	As per 6.53, most issues are resolved within AWS's default SLA timeframes. For worst case scenario issues that require a full environment re-build our RPO and RTO are 24 hours.	Noted
6.57	If transaction records are dated and time stamped are the times used local to the user or based on where the server is located?	Timestamps are stored in UTC but displayed in local time.	Noted
6.58	What protection is in place to enable users to able to access their accounting and other data if the service provider should experience serious difficulties, cease trading or decide to stop providing the service?	We provide MS Excel reports and database backups to clients upon contract termination.	Noted
6.59	If the system is hosted are there arrangements in place for this third party to continue providing a hosting service in the short term to allow time for customers to negotiate their own arrangements? If so, how long does the arrangement allow?	N/A	-
6.60	Are there any individual members of the vendor's staff whose leaving or illness would significantly reduce, or even stop, the service provider's ability to provide a full and reliable service to customers?	No. Access to high level resources is restricted to management (e.g. access to DNS settings) but there are always at least 2-3 individuals with this level of access.	-
Platform change management			
6.61	Describe your approach to upgrades including what option customers have not to take upgrades (if any)?	Upgrades are carried out frequently. Customers on cloud hosted envrionments do not have control on when the upgrades take place. Upgrades that require data migration (e.g. moving to a different rule engine) are optional in that the system would keep supporting the old version until and when the client opts to migrate to the new setup.	Noted
6.62	Are users able to test the application before new versions go into live use?	This is only supported for on-premise installations, if agreed with the clients.	Noted
6.63	Are users given notice before application changes are applied to the live system?	Yes, but only in the case of on-premise clients.	Noted
6.64	Are changes delivered into the live environment "switched off" to enable users to test them before enabling them for their environment?	When changes require data migration, upgrades are switched off by default and clients are migrated as and when required. This option is not supported for other types of upgrades.	Noted
6.65	Describe what testing and QA processes are undertaken before upgrades and other changes are made live/available to customers?	Critical features have automated tests; all features are installed on staging server and tested out by the team prior to being released; all code is peer-reviewed.	Noted
6.66	If a hosted system, explain the release management procedures in place and the associated segregation of duties?	Prior to release, all code is peer reviewed and accepted into the master branch by a senior technical team member. The release process itself is done by uploading the package to our central server where we have a tool that allows us to push these upgrades to different client servers; with the tool keeping a log of versions released.	Noted
6.67	Are users informed when they next login of the application changes that have gone into live use?	Yes, users are automatically informed and are provided a link to our release notes.	Noted
6.68	Do customer staff have to take any action (e.g. regression testing) when new editions, patches or upgrades are released? If so, please describe what they should ordinarily do.	Customer staff do not have to do anything unless this is planned for and agreed with on-premise clients in line with their internal policies.	Noted
Subscription options			
6.69	What is the minimum level of commitment must the customer sign up to, e.g. 36 months?	24 months	Noted
6.70	Where online payment is used, what type of security is used to protect sensitive information?	No online payment supported yet.	Noted
6.71	Where online subscription / payment is used, is an invoice provided to the customer and, if so, in what format?	N/A	-
6.72	When subscriptions need to be renewed, what advance notice is provided and what is the time limit for renewal?	N/A - contract is auto-renewed but clients can cancel by giving notice prior to renewal in line with the contract.	Noted
6.73	Is there a procedure for late renewal and is there a time limit after which subscriptions cannot be renewed?	N/A	-

Ref	Requirement	Vendor Response	Reviewer Comments
6.74	How soon after creating or renewing a subscription (if applicable) can the system / service be used?	This depends on the plan prepared with the customer since the subscription can only be used once the system is configured for the client. In some cases, this can be done in a matter of hours (e.g. the client asking us to apply a template setup) while in other cases we need to wait for customers to provide us with the relevant information and manually customize the environment.	Noted. Depends on customer requirements and system is very configurable. E.g. Client's existing AML rules in Excel (say) may need replicating in InScope.
6.75	What notifications / confirmations are provided to the customer regarding subscriptions and payments?	Contract is sent prior to customer being onboarded, a User Acceptance Certificate is sent for signing on go live; and invoices are sent quarterly.	Noted
6.76	To what extent are users able to access their accounting and other data if: - They miss one or two payments? - They cease being customers?	Missing payments are chased via our credit control processes where an account statement is sent via email and telephone calls are made over a period of 3 months. For SaaS clients, we may also notify users via the app itself. Our contract enables us to suspend the service if no payment is received. In case of suspension or contract termination, our offboarding process kicks in, where an official termination letter is sent to the client and our support team will send a data backup to the client prior to deleting the data from our servers.	Noted
6.77	At the end of the contract term, how long does a customer have to obtain a copy of their data from you?	We provide the user a copy of the data within a timeframe agreed with the client upon offboarding.	Noted
6.78	At the end of the contract term, how is a customer's data destroyed (if appropriate) and will that destruction be certified?	Database is removed from our server and backups are automatically lost after 10 days.	Noted
6.79	What is your processes regarding disposal of end-of-life and failed hardware devices that were used to operate your service?	N/A since data is in the cloud and all this is managed by AWS.	Noted
SaaS/Hosted Reporting			
6.80	Are reports produced from the same software as the financial applications or is separate reporting software used?	Reporting is done within the application.	Noted
6.81	Does any application software (i.e. other than a web browser or PDF reader) need to be installed on the user's computer in order to prepare or view the reports?	Reports can be accessed online (no separate software) or downloaded as Excel files.	Noted
6.82	What browser versions are support: - On desktop/laptop (PC, Mac, Linux)? - On Tablets? - On mobiles?	Major Support: Chrome, Edge, Firefox on desktops; Limited Support on same browsers + Safari on tablets/mobile devicese.	Noted
6.83	Is access to the reporting facilities and data controlled by the same procedures as access to the main application?	Yes	Noted
6.84	If it's different, explain the user access control facilities available to ensure information is only viewed by users with appropriate authority?	N/A	-
6.85	In what electronic formats are reports produced:- - PDF? - XML? - MS Excel spreadsheet? - CSV file? - As html for viewing in a web browser? - Other, please specify?	HTML & MS Excel	Noted
6.86	Are report documents stored on the web server or on the user's computer? If stored on the web server, are they secure to ensure only users with appropriate authority can get access?	Reports that are generated are directly sent to the client and not persisted on the web server.	Noted
6.87	For documents viewable in a browser is any data stored on the user's computer in a web browser cache or temporary file? If Yes: - Is there any protection against other users viewing the report or data on which it is based? - Is it clear on the reports when they were produced and the date of the data on which they are based, so the user can tell whether they are viewing out of date information?	Reports can be downloaded by the user and saved in the browser's default location.	Noted
6.88	Are communications between the browser and the server encrypted for any report related communications?	Yes, all communication is done via SSL	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.89	If reports are produced dynamically each time the user views them can historical reports be reproduced at any time?	Users can generate reports based on different date ranges but cannot download reports based on snapshot data at a particular point in time.	Noted
6.90	Can reports viewable in a browser be navigated dynamically by users? For example: - Enabling drill down to more detailed information? - Altering which columns and rows of data are displayed. - Choosing time periods? - Specifying selection criteria?	Some reports do support such features including- different filters (e.g. business units, time ranges, columns to display, client segments), and some support clicking on figures to list the clients represented by a particular figure.	Confirmed; segments again.
6.91	Can report data be reliably copied and pasted direct from browser viewable reports to an MS Excel spreadsheet retaining any table layout?	Most reports can be downloaded to MS Excel and can then be copied/pasted via Excel.	Noted
6.92	If reports are incomplete, for instance due to a poor Internet connection, is sufficient information provided to enable the user to notice that some of the report is missing?	When a user downloads a report, the report is always downloaded in its entirety.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
7.	**ANTI MONEY LAUNDERING**		
Global setup			
7.01	Does the system make use of global lists, e.g.: - Postcodes? - Client [business/firm] types? - [Accountancy] firm service lines and sub-services? - Other, please specify?	Yes, most lists are configured and managed by the clients themselves but we also maintain lists such as country risk scores from third party sources (e.g. FATF, HMT, KnowYourCountry).	Confirmed. Backgroud risk settings are configured by inScope. Also e.g. Country specific risk lists are also configured within the system.
7.02	Does the system have an audit trail that includes details of: - Changes to standing data (global lists)? - All manual entries/changes to inputs made by a user? - All items deleted from e.g. a Risk Assessment? - Information that has been uploaded? - Information provided by third-party suppliers? - All authorisations/approvals?	All changes are audited within the database. Important audit information (e.g. risk assessments, changes to master files) can be viewed via the user interface itself.	Confirmed
7.03	Can the system operate in multiple currencies? If so: - Pease state which are supported. - Confirm whether any additional (third party) services can be purchased in other currencies.	Given the focus is on client data and not transactions, there is no concept of currencies within the system.	Noted
7.04	Does the system support multiple languages?	No, the system is only available in English.	Noted
7.05	Does the system provide inbuilt workflow functionality?	Yes.	Confirmed
7.06	Does the system allow a user to use multiple devices to support mobile working, e.g. a workstation, phone and/or a tablet?	Multiple devices are supported but the system is only fully tested on laptops (e.g. the structure chart may not work correctly on mobile devices).	Noted. Still usable on a small screen if needed.
7.07	Does the system provide a facility for auto-saving changes during a user's editing session? If so: - Can the frequency of these auto-saves be manually set? - Can the user initiate a save manually? - Can a user roll back to a previous saved version?	No auto save functionality is available.	Noted. Can do partial saves at most points; although a message may appear to indicate that data entry is not yet complete.
7.08	Can the system work in an "offline" mode, with transactions transferred to the service once Internet connectivity is available and enabled? i.e. can information be completed off-line and uploaded?	No	Confirmed
7.09	Does the software directly integrate with on-line software/services? If yes, please list the packages/services in the categories below and explain the method of integration (e.g. dedicated connector, webservices, etc): - Banks and other financial institutions? - HMRC? - Accounting software (e.g. Sage, QB, Xero)? - Tax software? - Pension software? - Credit check agencies? - Providers of DBS checks? - Others, please specify?	Yes, out-of-the-box the system can be configured to integrated into World-Check One or StartKYC. The system can also be customzied to integrate with CRMs or LOB applications on a case-by-case basis.	Noted. Linking to other AML-specific applications as opposed to general business applcations. However, have integrated with other systems (e.g. CRM) using the API, on a case by case basis.
7.10	Does the system provide a portal to enable the exchange of information between the Accountant and their Client(s)? Notes that the phrase: "Accountant" will be used for the firm of Accountants having individual users of the software, and "Client" will be used for the customer of the accounting firm on whom the AML compliance checks are being run.	Yes	Confirmed
7.11	If yes, please clarify the level of security in relation to: - How authentication is managed? - Whether Multi Factor Authentication (MFA) is supported? - Is a secure [https:] connection provided? - Are login / inactivity timeouts enforced? - Are complex passwords required as well as the need for regular password changes?	At the moment, access is enabled via Google and Microsoft accounts. We are planning on adding additional features using one-time links and MFA. This is being planned to be developed with one of our clients in 2023 and will then be rolled out to all our clients.	Noted
7.12	What end-user computing platforms are supported for access, e.g. Windows, Mac, iOS, Android? And what Internet Browsers are supported?	Self-service portal can be accessed from desktop/tablet/mobile from any modern browser (Edge, Chrome, Firefox, Safari)	Confirmed
7.13	What Accessibility standards have been adhered to in the design of the portal?	No standards are used	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
Firm setup and registration			
7.14	On first use, do the details entered as part of the on-line registration process, automatically pre-populate the Accountancy Firm's "Firm" details within the system?	All the details related to the firm are set up by us during the onboarding process.	Confirmed. Setup by Inscope as configuration takes place at the same time.
7.15	If so, is there the option to subsequently amend the Firm details?	Yes, a lot of details can be updated by the firm (e.g. user information, services, risk scores, etc…)	Confirmed
7.16	Can the services undertaken by the Accountancy Firm be selected from a master-list so as to define the areas of operation (and thus operational risk) of the firm?	Services can be added by the firm.	Confirmed
7.17	Can the selected services be amended if the Firm changes what it offers to it clients? If so, is a dated history maintained of the services selected ?	Yes, the master list of services can be changed by the firm. Services offerred to clients can be dated.	Confirmed. Service start and end dates are shown and history retained.
7.18	Does the system provide an introductory workflow to ensure that the key firm compliance and user security procedures are in place before the system is used to manage clients and undertake client risk assessments? If so, please explain what is provided?	The system is configured in line with the firm's policies (with our assistance). Warnings are shown on the dashboard to guide the user to complete the profile and carry out risk assessments. This process is the key focus of our first training session with the user.	Setup of services and associated risk-scores are set as part of the on-boarding process.
7.19	On first use does the system come pre-populated with a global (administrator) account, with the ability to setup and manage an Money Laundering Reporting Officer ("MRLO") account?	Yes, the system comes with a global administrator who can then create users and assign different permissions. Note that there is no specific "Role" defined as MLRO but this can be created and different permissions assigned to the MLRO based on the firm's policy.	Confirmed
7.20	Must the MRLO [user] be created before firm and client risk assessments can be undertaken?	Not necessarily although this is usually the case.	Noted
7.21	Must a firm risk assessment be undertaken before client risk assessments can be undertaken?	Yes, the system has to be configured in line with the firm's risk assessment policy. This is usually done with our assistance prior to go live.	Noted
7.22	Does the system have the ability to provide third-party verification services from within the platform?	Not at the moment although this is a candidate feature for 2023.	Noted
7.23	If so, can the results be recorded against the clients on whom verification has been requested?	N/A	-
7.24	What third-party services are integrated: - Client [contact] verification? - Client [company] verification? - Digital biometric verification? - Company House firm-details? - Other, please specify?	N/A	-
User management			
7.25	Does the system provide for the setup and maintenance of the details of the users (the individuals in the Accounting firm) using the software?	Yes	Confirmed
7.26	If yes, does the system enable the user to change their own details and change their password?	No because the system integrates with the firm's existing authentication mechanisms (e.g. Active Directory, Azure AD or Google)	Noted
7.27	Does the system provide a permissions matrix so that rights can be set at user and role/group level? If so, does this provide at least the following levels of security: - An administration/global user who can setup the MLRO? - The MRLO, who administers other users and authorises any AML documentation sent for approval. - A normal users, who undertakes the AML checking process for clients. - Other levels, please specify?	Yes the system allows users (or groups of users) to be configured to have a number of permissions. At the moment, these permissions include: Manage Account (Administrator), Manual External Searches / Override Profile, Override Risk Assessments, Carry Out Risk Assessments, Permanently Delete / Restore Entities, Permanently Delete Documents, Delete Entities, Set Serviced Clients, Approve Entity External Searches, Edit Entities, View Reports, Read Data, Signout Users	Confirmed; a comprehensive list of roles is provided.
7.28	Can multi-level authorisations be set? E.g. A users and their manager must both approve an action; or perhaps the users and the MLRO?	Yes, and there are different options for this to be set up: a) two levels of authorization can be set up for dismissing of external searches; b) two levels of authorization can be set up for carrying out Customer Risk Assessments (this is a feature that is currently in development and scheduled for version 8.8). c) custom workflows can be built for the client on a case-by-case basis.	Noted. Custom workflows (per user) could be used in the interim.

Ref	Requirement	Vendor Response	Reviewer Comments
7.29	Does the software allow a user to assign a "delegate", who has access to view/amend a sub-set of the full information entered into a risk assessment? If yes then please explain the levels of access provided.	No	Noted
7.30	Can a separate user account be created specifically for a "regulatory body" which provides read-only access to the data for audit purposes? If so, please explain what is provided.	A read-only user can be set up although there is nothing specific around this being used for regulatory bodies.	Confirmed
7.31	Can users be "archived" if they are no longer active within the Accountancy firm? If so: - Is a history of the risk assessments that they worked on retained by the system? - Can they be "unarchived" to re-enable their access? - Must a subscription still be paid for an archived user?	Yes, users can be disactivated but they will remain in the system indefinetely if they have carried out an action that is within the audit trail. The user can be re-enabled by administrators. Subscriptions are based on concurrent logged in users so the licence is not effected by this.	Confirmed; just change the user's status.
7.32	Are there restrictions on more than one user at the Accountant working on the same client risk assessment at the same time?	A CRA can only be approved by one user at one point in time. Data can be input concurrently by different users - however we do employ optimistic concurrency which means that in some cases, the second user changes may be rejected.	Confirmed. Multiple users could have contributed to [or be working on] different parts of the risk assessment; but only one user will do the final approval.
7.33	Are there restrictions on one user at the Accountant working on multiple risk assessments (for different clients) at the same time?	No.	Noted
7.34	Is it easy to see what security level/profile a user is logged in as, e.g. is their users 'name' displayed on-screen? If so, can a user change profile [by logging in again] from a menu screen?	Yes the system displays the name of the user. In case a user has multiple accounts (i.e. belonging to multiple firms), they can switch the firm via the user interface itself.	Confirmed. Name and user type is shown on-screen.
Internal AML training			
7.35	Does the system have an in-built training module that logs whether staff have undergone firm-mandated AML training and read [and agreed] to the firm's latest AML policy?	No, this is not a feature of the system, since the the system is aimed at managing customer data not the firm's internal information.	Noted
7.36	If yes: - Is full history of training modules undertaken kept with each employee? - Are there associated tests with the training modules?	N/A	-
7.37	Is the need to undertake this training forcibly refreshed periodically or as the system or regulations are updated?	N/A	-
7.38	Are users blocked from undertaking client risk assessments if they have not passed mandatory tests?	N/A	-
7.39	As training modules are updated are users prompted to update their learning?	N/A	-
7.40	Does the system have a library of AML-related training and help accessible to users of the system? If yes, are these kept up to date by the service provider to ensure that they meet the latest legislation?	N/A	-
The Firm's AML policy			
7.41	Does the system provide a AML Policy template that the Firm can tailor and save as the Firm's "Standard"?	The system is configured in line with the firm's policy. We have plans to provide a feature that generates a document with the way the system is set up. This is a candidate feature for 2023.	Noted. The system does not record a client's formal policy, but it is essentially captured as part of the setup process whch records risks in various categories.
7.42	Can updated versions of the default template be uploaded when provided by the vendor; with changes easily identified to make for simple updating of the Firm's Standard?	We do not provide updates the to risk templates and rules since these are managed by the firm.	N/A
7.43	Can individual sections of the Policy be amended separately, rather than the whole document needing to be changed in one go?	Yes, individual elements can be updated.	Confirmed; see 7.41, e.g. changing a country's risk level.
7.44	Is a history of changes retained in the system?	An audit trail is kept for all changes made by the user, including changes to the rules made by the administrators.	Confirmed
7.45	If the Firm's AML Policy is updated, are users required to read and acknowledge this the next time that they use the system?	N/A	Noted.

Ref	Requirement	Vendor Response	Reviewer Comments
7.46	If so: - is this logged in their training record? - Is it possible to see easily which users have yet to acknowledge the new version?	N/A	-
The Firm's AML risk assessment			
7.47	Does the system provide an inbuilt Risk Assessment for the Firm itself, based on the areas of work defined in section 7.15 above	No, the system is designed at carrying out customer risk assessments; not Firm Risk Assessments	Noted. See also 7.41
7.48	Are the Firm Risk Assessment questions for the various different services provided by Accountancy firms included as part of the platform? If so, list the main areas included.	N/A	-
7.49	Are some questions in the Risk Assessment mandatory and others optional depending on the services selected by the firm?	N/A - assuming this question is about Firm RA; not CRA.	-
7.50	Does the system show progress through the Risk Assessment: which sections have been started and which completed?	N/A - assuming this question is about Firm RA; not CRA.	-
7.51	Does the system allow subsequent amendment of individual entries, without the need to walkthrough complete sections of questions again?	N/A - assuming this question is about Firm RA; not CRA.	-
7.52	Does each question have its own 'high' or 'low' risk outcome depending on the answer, and provide notes of the steps that could be taken to address each of the high risk outcomes?	N/A - assuming this question is about Firm RA; not CRA.	-
7.53	Do all the questions have additional guidance and useful links should further clarification be required by the user?	N/A - assuming this question is about Firm RA; not CRA.	-
7.54	Is a comments box available under each question, to provide the facility to capture additional information relevant to the Firm Risk Assessment?	N/A - assuming this question is about Firm RA; not CRA.	-
7.55	Are suggested risk mitigation steps included against each question?	N/A - assuming this question is about Firm RA; not CRA.	-
7.56	Are high risk areas clearly highlighted?	N/A - assuming this question is about Firm RA; not CRA.	-
7.57	Is a summary provided of the number of questions answered and the number falling into each risk category? If yes, is there drill through to the underlying questions?	N/A - assuming this question is about Firm RA; not CRA.	-
7.58	Does the system log the completion of the various sections of the input forms once all questions in a section have been completed?	N/A - assuming this question is about Firm RA; not CRA.	-
7.59	Is it possible to manually log a section as complete even if an answer/information has not been provided for every question in a section?	N/A - assuming this question is about Firm RA; not CRA.	-
7.60	Can a completed section be manually marked as not completed?	N/A - assuming this question is about Firm RA; not CRA.	-
7.61	Does the system have search functionality to enable the user to jump to a specific question?	N/A - assuming this question is about Firm RA; not CRA.	-
7.62	If a question is answered as a 'no', does the system allow the entry of a suggested mitigation by the user?	N/A - assuming this question is about Firm RA; not CRA.	-
7.63	If so, is the MRLO alerted to this and do they have the option to accept/reject the suggested mitigation action?	N/A - assuming this question is about Firm RA; not CRA.	-
7.64	If all high risk answers for the Assessment been accepted as 'mitigated' then will the Firm move from the high risk category, to the risk mitigated category?	N/A - assuming this question is about Firm RA; not CRA.	-
7.65	Does the system provide: - A viewable answer history? - An audit trail of answers and changes to answers? - A PDF report of the risk assessment? - Other reports, please specify?	N/A - assuming this question is about Firm RA; not CRA.	-
Client setup			
7.66	Does the system provide for the setup and maintenance of the general details of the Client? If so, does this include: - Company name and company number - Address - Contact information - A flag denoting whether the Company is active or not? - Beneficiary details - Contact details	Yes	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.67	Can client/company information be imported using a standard spreadsheet template? If so, how is this validated?	Yes, this can be done via a one-time migration from a template. This requires intervention from our tech team.	Noted. An Excel template is used.
7.68	Can document files be uploaded against a client [to support the Risk Assessment]? - If yes, what format of files is supported, e.g. PDF?	Yes, we have a white list of file formats that includes PDF, word documents, common image files, common video files, Excel.	Confirmed; this feature is comprehensive.
7.69	If documents can be held against clients, does the system have functionality to manage these documents, including the ability to: - Upload/download documents? - Mark documents as reviewed and/or approved? - Manage document retention (for GDPR compliance)? - Other, please specify?	Users can upload/download documents, tag them by type, add expiry dates for documents and add comments to them. Options to delete and permanently delete documents are also provided.	Confirmed
7.70	Can a client be flagged as archived, so that new risk assessments cannot be undertaken? If so, can an archived client be unarchived by a user with sufficient security privileges?	Yes this is supported.	Confirmed
Client risk assessments			
7.71	Does the system contain a series of client risk assessment templates that cover different client types, e.g. Limited, Company, Charity, Partnership, Trust, etc	Yes CRAs can be configured differently for different types of clients. For example, different questions can be configured for different client types and the way they effect the risk score can change for each type.	Confirmed. This is all part of the initial configuration. Risk "pillars" can be set in segments, with different weightings. And individual risk factors can have set scores. Combining all this gives a high level of risk configurability.
7.72	Can a client Risk Assessment type be selected based on the type of company that the client is identified as during its setup? If so, is the type of the associated Risk Assessment selected automatically by the system based on the details entered previously?	Yes, CRA scores and rules are flexible based on the data input (includin the client type).	Confirmed; see 7.71
7.73	Do the client Risk Assessments provided cover all the areas of work selectable during the Firm setup process, see section 7.15 above	CRA rules are configured to address all service lines set up for the firm. There may be scenarios where the firm decides not to cater for some service lines that are non-reportable / non-relevant in terms of AML legislation.	Confirmed; see 7.71
7.74	Are some questions in the Risk Assessment mandatory and others optional depending on the services selected by the firm?	Yes, custom fields that drive the Risk Assessment can be set up to be optional or mandatory.	Confirmed
7.75	Does the system show progress through the Risk Assessment: which sections have been started and which completed?	The system maintains a list of warnings that need to be completed.	Confirmed. A set of warnings is shown. And the approval screen shows what areas have been completed. The user can then drill straight thru into the data. There is an overall dashboard display that summarises the warnings too.
7.76	Does the system allow subsequent amendment of individual entries, without the need to walkthrough complete sections of questions again?	Yes, individual fields can be updated and the system automatically determines if these changes effect the overall risk score of a client.	Confirmed
7.77	Does each question have its own 'high' or 'low' risk outcome depending on the answer, and provide notes of the steps that could be taken to address each of the high risk outcomes?	Questions can be configured to have risk scores (and therefore risk classifications) and further questions/documents can be set up to guide the users to take additional steps if necessary.	Confirmed
7.78	Do all the questions have additional guidance and useful links should further clarification be required by the user?	Given that most questions are configured by the firm (or at least by us in line with firm's policy), it is up to the firm's administrator to provide appropriate guidance.	Confirmed. There is a "description" field that can be configutres against each question by the client as part of the setup process.

Ref	Requirement	Vendor Response	Reviewer Comments
7.79	Is a comments box available under each question, to provide the facility to capture additional information relevant to the Firm Risk Assessment?	A comments box is available within the overall risk assessment itself. Further comment boxes can be added by administrators anywhere within the custom fields section and can be set up to be mandatory depending on different scenarios. For example, administrators can set up a question such as "Is the client a PEP?" and if the user answers "Yes", a comments field asking the user to specify the PEP connection can be set up to be mandatory.	Confirmed
7.80	Are suggested risk mitigation steps included against each question?	Mitigation steps can be configured by administrators but work in a different manner. For example, a document may be triggered as being mandatory as a mitigation step; or a custom field or task can automatically be configured in high-risk scenarios.	Confirmed; the [segment] rule can be set mandatory as appropriate.
7.81	Are high risk areas clearly highlighted?	Yes the Client Risk Assessment screens provide overview of the high-risk areas related to the client.	Confirmed, with the use of colour [high risk is red!]
7.82	Is a summary provided of the number of questions answered and the number falling into each risk category? If yes, is there drill through to the underlying questions?	Yes, a summary of all risk indicators is shown on the Client Risk Assessment screen.	Confirmed
7.83	Does the system log the completion of the various sections of the input forms once all questions in a section have been completed?	This works a bit differently - The system keeps track of all data that is missing and uses a series of warnings to guide the user to complete the profile.	Confirmed, as described.
7.84	Is it possible to manually log a section as complete even if an answer/information has not been provided for every question in a section?	The system allows administrators to enable the system to behave this way but providing Yes/No switches or dropdown boxes that mark different sections as optional.	Confirmed, as described.
7.85	Can a completed section be manually marked as not completed?	As per above, this can be enabled via custom fields.	Confirmed, as described.
7.86	Does the system have search functionality to enable the user to jump to a specific question in the information collection process?	No specific feature is provided for this but in case of firms with a large number of fields, users can use the default Find option within browsers (Ctrl+F) to find fields within the form.	Confirmed. But a one-screen scroll will be enough cover most situatons.
7.87	If a question is answered as a 'no', does the system allow the entry of a suggested mitigation by the user?	Yes, if configured by administrators via custom fields.	Noted, see 7.80. Free text input or a document upoad might be required.
7.88	If so, is the MRLO alerted to this and do they have the option to accept/reject the suggested action?	This is not provided out-of-the-box but such features can be built for clients in line with their custom workflows.	Noted
7.89	Do the answers made to the questions in an Assessment indicate whether simplified, standard, or enhanced due diligence is required (i.e. is the criteria built into the questions in the Assessment), and adjust the questions sets [and number of questions] accordingly. See also "**Checking Clients**" below.	Yes this is supported. The system goes beyond three categories and supports any number of rules that can be configured in line with simplified/standard/enhanced due diligence.	Confirmed. As above, this can be done with the use of segments; but the system goes beyond just these three categories.
7.90	If all high risk answers for the Assessment been accepted as 'mitigated' then will the Firm move from the high risk category, to the risk mitigated category?	This depends on how the system is set up and how risk scoring is set up by the firm's setup.	Noted
7.91	If the answers made to questions indicate that the client is classified as "high risk" [*] does the system require additional Enhanced Due Diligence ("EDD") questions to be answered? [*] - In a high risk ovation/jurisdiction - Identified as a Politically Exposed Person (PEP) - Where there is a high risk of ML or terrorist activity.	Yes this is how systems are typically set up although all of this is dependent on the firm's set up.	Noted; see 7.89
7.92	Does the system provide: - A viewable answer history? - An audit trail of answers and changes to answers? - A simple summary of the answers falling into high/low risk and mitigated/non-mitigated categories?	Yes, an entity history screen is provided; together with a summary snapshots of all elements effecting risk scores at the current time (as well as historic whenever a customer risk assessment was carried out).	Confirmed
Editable and re-usable client risk assessment profiles			
7.93	Does the system allow the Firm to create their own Client Risk Assessment profiles?	Yes	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.94	If so: - Does the system include a rules engine to help create appropriate questions and resulting risk ratings? - Can the rules link to the results of client identify checks (see below) - Does the engine allow the generation of risk scores, which can then trigger additional questions (EDD)?	Yes, all rules can be configured in different ways and can be used to trigger EDD. Automated identity checks are not yet supported.	Confirmed
7.95	Does the system provide the option for an authorised user in the Firm to manually amend a Client Risk Assessment template?	Yes, the rules can be changed by the firm's administrator; authorised users can also override the risk classifications at individual client level.	Confirmed
7.96	If so, can the amended template be saved as: - The new default for that client type? - A selectable template for that specific client? - A selectable template for a number of clients? - A default template for one or a number of clients? - Other, please specify?	Yes ,changes to the risk policy can be set for subset of clients (e.g. we can add a mandatory custom field that is applicable to clients with UBOs that are not UK residents).	Confirmed
7.97	Does the system provide the option for an authorised user in the Firm to manually prefill answers to the questions in a Client Risk Assessment template, and then save this template for [re-]use on similar clients, e.g. those in a similar industry? If so, is there an additional cost for this feature?	This is not directly supported, but different rules can be set up for clients operating in a similar industry (for example, we can have a dropdown that allows the user to select the industry, and the mandatory fields change based on the selected industry).	Confirmed
7.98	If so, can the amended template be saved as: - The new default for that client type? - A selectable template for that specific client? - A selectable template for a number of clients? - A default template for one or a number of clients? - Other, please specify?	As per 7.96 this can be configured for a subset of clients based on different criteria.	Noted
Client identity checking			
7.99	Is the client checking process undertaken: - By the Accountancy Firm's own users? - By the supplier once the client's details have been entered? - By the Accountancy Firm but with the option of assistance from the supplier if required (at an additional cost)? - Other, please provide details?	Identity checking is assumed to be done by the firm itself.	Noted; outside of the system.
7.100	Does the system provide integrated identity checking functionality?	Not at the moment although this is a candidate feature for 2023.	Noted
7.101	If so: - What third-party providers are used? - Is a separate/additional subscription required?	N/A	-
7.102	Can the results of a check be saved against the client record together with the data of the check and originating user ID?	Yes, documents can be uploaded to the system and saved against a client.	Confirmed
7.103	Does the system provide integrated biometric ID verification functionality?	No	Noted
7.104	If so: - What third-party ID providers are used? - Is a separate/additional subscription required?	N/A	-
7.105	Can the results of a check be saved against the client record together with the data of the check and originating user ID?	Yes, documents can be uploaded to the system and saved against a client.	Confirmed
7.106	Is there a time-window within which these checks must be undertaken once the process has been started?	N/A	-
7.107	Does the system provide functionality to check the identity of a client where that client/customer is not a private individual, but rather an organisation? If so, does this allow for the identification of the organisation's ownership and who has control.	No	Noted
7.108	Does the system provide an integrated link to Companies House in order to verify company details?	No	Noted
7.109	If so: - Is the link direct to Companies House or via a third-party provider? - Is a separate/additional subscription required?	N/A	-
7.110	Does the system provide any third-party links for checking overseas companies? If so, please provide details	No	Noted
7.111	Can the results of a check be saved against the client record together with the date of the check and originating user ID?	Yes, documents can be uploaded to the system and saved against a client.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.112	Does the system provide an integrated link to third-party companies providing credit-checking functionality?	No	Noted
7.113	If so: - Is a separate/additional subscription required? - Can the results of a check be saved against the client record together with the data of the check and originating user ID?	N/A	-
7.114	Does the system have a set of standard emails that can be used to request client identification related documents and/or provide authorisation from individuals for information searches?	The system can be set up to have template emails that are sent to clients requesting them to upload information into the system.	Confirmed; there is an 'admin' section to setup email templates.
7.115	Is an audit trail retained of the requests made and emails sent? If so, does the system provide the facility for an internal approval to be undertaken and recorded against each?	Yes, these requests are logged and when the user supplies information, this information needs to be approved by a user within the firm before being accepted into the system.	Confirmed; a full trail is held for each request.
7.116	*THIS ITEM IS LEFT INTENTIONALLY BLANK*		
7.117	Does the system have the facility to produce documentation on a clients that shows: - Entity structures? - The ultimate beneficial owners?	Yes, structure charts and lists of beneficial owners can be generated and downloaded.	Confirmed. Structure Charts (and percentage ownerships) are shown. If a company and/or individual is already in the system then the details can be selected. If the structure is changed it may trigger the answer to a rule needing to be reassessed. This is flagged up by the system.
7.118	If so, does this cover: - Individuals? - Companies? - Trusts? - Pension Funds? - Sole Trader? - Other entities, please specify?	Lists of beneficial owners and related parties (e.g. directors) are supported for different types. A graphical structure chart is only supported for companies at this point in time.	Confirmed; see 7.117
7.119	Does the system have a database of pre-verified entities? If so, is this updated by the supplier on a regular basis?	No	Noted
7.120	Is the user able to drill down/across into the entity structure and view the details at each level?	Yes	Confirmed
7.121	*THIS ITEM IS LEFT INTENTIONALLY BLANK*		
7.122	Can a user report/refer a client to the Firm's MLRO? If so, is further user activity on that client blocked until unblocked by the MRLO?	Such functionality would need to be built using custom workflows developed for the client.	Noted
Dashboard			
7.123	Does the system incorporate dashboard functionality such that the current status of client Risk Assessments can be presented to the Accountant on a single screen, showing: - Client and client type (Risk Assessment type)? - Progress of any current assessment? - Historic Risk Assessments undertaken for that client? - Whether there are outstanding reminders/actions? - Whether there are associated documents logged in the system? - Other, please detail?	The dashboard displays statistics and lists of entities that are due for risk assessments, have expiring documents, have incomplete data or external search hits (e.g. sanctions, PEP or adverse media hits), outstanding tasks, etc…	Confirmed. Dashboards are comprehensive and allow full drill-through.
7.124	If so, can the Accountant navigate directly from the dashboard into: - A historic or currently open risk assessment? - Any outstanding reminders/actions? - A view of the company structure and beneficial owners? - Other, please specify?	All such lists available on the drop down allow a user to click on the name of the entity in question and review the entity details (with links to complete the profile / take appropriate action).	Confirmed
7.125	Is the Accountant able to share the dashboard with the Client? If so, explain how this operates.	No this is not supported.	Noted
Reports			

Ref	Requirement	Vendor Response	Reviewer Comments
7.126	Does the system provide a series of inbuilt reports that cover: - The details of a client risk assessment? - Individual sections of an assessment, and the underlying questions and answers? - Lists of policies - Client details - Training reports - Other, describe the reports available.	At an entity level, users can generate the summmary of the client risk assessment. At a global level, users can generate statistical reports, lists of clients/beneficial owners/officers.	Standard reports have filters, and reporting 'dimensions' can be defined. It is also possble for a user to create custom reports and undertake segment-based reporting.
7.127	Does the system allow drill through from a report into the underlying Assessment section/question?	Yes, most reports contain links to the list of clients or the client dashboard.	Confirmed
7.128	Are all reports adequately titled and dated? e.g. report name, Client name, pages, numbers etc.	All reports have a title and client name. Page numbers are not available within Excel exports.	Confirmed
7.129	Do the reports provide totals where applicable?	Yes, were applicable (e.g. statistical reporting)	Confirmed
7.130	Does the system allow the layout of reports to be customised: - Font? - Paragraph style? - Page format? - Watermark, e.g. "Draft"? - Company logo/graphic? - Other, please specify	No	Noted, but in Excel so can customise if needed.
7.131	If so, does the system allow graphics and/or Participant logos to be incorporated in the page formatting?	No	See 7.130
7.132	Can all reports be print previewed?	Reports can either be viewed on screen or downloaded to Excel from where they can be print previewed and printed.	Confirmed
7.133	Does the reporting functionality have the facility to scroll up and down when output to screen?	Yes	Confirmed
7.134	Can reports be output directly to other formats e.g. Excel, CSV, txt, XML, PDF etc. for any period of time required? - If so, please state the formats supported.	Most reports can be exported to Excel.	Confirmed
7.135	Explain how a report [or parts of a report] can be published/provided to the Participant.	Reports can be downloade to Excel and shared as required.	Confirmed