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	HEADER		
	ICAEW Technical Accreditation Scheme **"Anti Money Laundering" Software Evaluation**		
	Date completed: 27th October 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			

Ref		Vendor Comments	
1.08	General Overview:	AMLCC was created in 2008 to effectively and efficiently solve the challenges that regulated businesses have in complying with the latest anti-money laundering rules and regulations and has enabled 1000s of UK accountants, bookkeepers, auditors and tax professionals to pass their supervisory visits. Your legal obligations are not optional and the steps to achieve those obligations are clearly defined. AMLCC provides an interactive set of connected tools to fulfill each of these steps - all online, all in one place. The AMLCC platform is quickly and easily tailored to your business to assess the risks it is facing and effectively direct resources to facilitate the risk based approach. Combining compliance, education and risk management in one, online platform covering money-laundering, terrorist financing and proliferation financing helps identify suspicious activity. Failing to identify and report such activity can lead to a 14 year jail term. AMLCC enables you to prove your compliance at any time.	
1.09	Supplier background:	AMLCC is an AML expert first, tech firm second. It was founded by Richard Simms, who is a regulated professional and leading authority on anti-money laundering compliance, risk management and education. In his role as a chartered accountant and owner of an AML regulated licensed insolvency practitioners, Richard could never find the right tool to deal with the threat of money laundering head on, so in 2008 he created AMLCC. The AMLCC platform has been developed in liaison with, and is endorsed by, supsupervisory bodies such as the IFA and the AIA.	
1.10	Product background and suitability for the user:	AMLCC has a suite of tools to enable a firm to follow all the necessary steps to comply with its legal money laundering, terrorist financing and proliferation financing obligations and protect itself and its employees from the consequences of not complying with the regulations. AMLCC offers: * Comprehensive online AML training for all employees, with additional MLRO and senior management training. This is updated with any changes to legislation or sector guidance. * Editable templates for your AML Policy and firm-wide risk assessment can be easily tailored to your business and the risks it is facing. * Multiple entity-type client risk assessments to make the onboarding and client risk management process quicker, easier and more focused. * Firm and client risk assessments provide guidance and mitigation advice. You can add comments and documents to show your actions and demonstrate your thought processes. * Using the AMLCC Suspicious Activity Reporting tool, employees can make an internal SAR	

Ref		Vendor Comments	
1.11	Add-on modules:	Users have the option of saving even more time during their onboarding process with optional reusable client profiles. They can create and save a set of model risk assessment answers for each client type. These are entirely editable, so each assessment can be made unique. Pay As You Go client identity validation checks via Equifax - including the Electoral Roll, Halo's Deceased Database, Insight Credit Agreements, Court Data, The UK Sanctions List, The Politically Exposed Person (PEP) List, and CIFAS Fraud Database. These are automatically saved to the client's AMLCC profile. Pay As You Go biometric ID verification via Hooyu - Government issued document certification performs multi-point face recognition and liveness anti-spoofing detection, and performs a false document check against the client's bank statement, utility bill or council tax bill. These are automatically saved to the client's AMLCC profile.	
1.12	Typical implementation [size]:	AMLCC can be used by any firm of any size. An unlimited number of entities can be loaded onto a firm's profile within their annual subscription fee, allowing the ultimate flexibility. Discounts are available for smaller firms under certain turnover thresholds. Additional staff access can be purchased	
1.13	Vertical applications:	AMLCC is a vertical software application as it targets the UK accountancy and other DNFBP markets to supply AML compliance, risk management and education software. Within AMLCC users can access other vertical applications for an additional charge such as Equifax for identity validation checks, Hooyu for biometric ID verification checks and Creditsafe for company credit checks.	
1.14	Server flatform and database:	Amazon Web Services (AWS), and MySQL database management system.	
1.15	Client specification required:	AMLCC is a cloud based SaaS platform so there is no user specification requirement other than internet connection and up-to-date browser software.	
1.16	Partner network:	AMLCC partners with a number of the accountancy sector professional membership bodies. For example the AMLCC platform is endorsed by the IFA and the AIA.	

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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)		
*	The system does not integrate with Microsoft's Active Directory for single sign-on, but AMLCC is a cloud based SaaS product.		3.08
*	No multi-factor authentication, although this is on the roadmap.		3.09
*	Data import is restricted to CVS files. A template is provided and this is validated on input.		4.17
*	Users cannot create saved searches /filters; but items can be easily/quickly selected from the dashboard..		4.36
*	Reports cannot be added to user menus and user-defined reports cannot be created and saved. However, this is because users cannot create/edit reports as these might not be compliant with AML regulations.		4.37 4.38
*	Customisable branding is not suported. This is not relevant as AMLCC is used by a regulated business to comply with its legal obligations as opposed to by the underlying client(s).		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. See comments above.		5.10, 5.13
*	There is no universal seach facility. However, general searches are available across multiple areas of the system. The firm can drill through from dashboards.		5.15
*	The user manual/help is not editable by the end-user. There is no traditional 'manual', the help being progress indicators, pop-ups, guidance and mitigation steps and a suite of videos.		5.22, 7.50
*	ESCROW is not provided. Note that this is not unusual for this sort of software [subscription] service.		5.23
*	No current links between the software and other packages inc links to spreadsheets. This is not required. There is a .CSV import function via an excel spreadsheet template to upload bulk client information.		5.41, 5.42
*	The supplier has a test environment but this is not offered to users to test software changes. AMLCC note that: "*Software changes are generally regulatory driven changes and therefore have to be adopted by the users - these are not a matter of choice. We do have a number of regulated firms who will test new developments for us where we deem it to be appropriate or necessary but this is not widely offered to large numbers of users.* "		6.14 6.62-6.64
*	No SLA is provided relating to service availability.		6.28
*	No ability for customer to specify or take their own backups. However, AMLCC has a rolling back up over the previous 30 days.		6.51
*	Reports are only produced in PDF format; no ability to export in other formats. This is deliberate so that they cannot be altered. This is a regulatory compliance issue.		6.85 6.91
Evaluation conclusion			

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2.03	For the specific use-cases in support of accountancy firms complying with their legal AML (Anti-Money Laundering), CTF (Counter-Terrorist Financing) and CPF (Counter Proliferation Financing) obligations, relating both to the firm itself and its clients, 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 * Any firm choosing to use AMLCC is reminded that full compliance with AML obligations stems not only from the choice of technology platform and data feeds but also from ensuring that appropriate business processes and staff training are in place.		
2.03a	Note that AMLCC make it clear that for their platform to be effective it does NOT require the need to take out additional subscriptions to data services. However, these services are available at an additional cost from within the AMLCC platform if required. Access to data services to enable PEP/sanctions/barred director checks etc can be accessed from free open sources. It's clear from published guidance that use of paid or subscription services to satisfy checks on PEP/sanctions/barred directors is not required.		
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.	**ACCESS AND SECURITY**		
Access control			
3.01	What security features are included to control access to the application?	From a user perspective the authentication is secure, encrypted unique username and password. From an administration / developer perspective, AWS Identity and Management users have 2 factor authentication and secret keys.	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 there are 4 user levels and each one has a separate login and can view and access different parts of the platform depending on the role.	Confirmed
3.03	Is this access to the application managed by:- - Individual user profiles? - User groups or job roles?	Individual user profiles - each user has there own unique login details.	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?	The AMLCC admin team can produce a report of all users. They can also drill down to see the users in each firm account and the level of those users within the admin panel.	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. The user can only see the parts of the platform relevant to their user level.	Confirmed
3.06	Does security allow for access to be limited to: - Read only? - Read/write? - Read/amend/delete?	Yes different user levels have different types of access. However, only the 'superuser' access is read only. The rest of the user levels can amend or use any parts of the platform they are authorised to access.	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?	Non applicable as all reports are generated within the platform.	Noted
3.08	Does the system security integrate with Microsoft's Active Directory or other tools that provide a single sign-on?	No the AMLCC access for a user is a very secure and closely controlled process. Microsoft Active Directory would not be appropriate for AMLCC. Microsoft Actice Directory is designed for on premises set ups, where the workstations all connect to a network, usually physical infrastructure in a building. Despite the application being widened it is still only approriate for traditional Windows-centric networks. AMLCC is an extremwly secure, vritual, cloud SaaS platform and as such Active Directory would struggle to connect or manage it.	Noted
3.09	Does the system provide multi-factor authentication (MFA)?	No but roadmapped to add within the next 6 months.	Noted
Passwords and access logs			
3.10	Is access to the software controlled by password?	Yes	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?	N/A	-
3.13	Are passwords masked for any user logging in?	Yes they are masked and cannot be copied.	Confirmed
3.14	Is password complexity available and enforced?	Yes Minimum 8 characters, at least one Capital, Character and number. (Characters are restricted)	Noted
3.15	Are passwords encrypted?	Yes - hashing using bcrypt algorithm	Noted
3.16	Are users automatically logged off after a pre-set idle time? - Can the time period be changed? - Can any information be viewed without being logged in, including after logging off, if so what information?	Yes after 20 minutes off inactivity. Yes the time period can be changed but only system wide by the development team. No information can be viewed without being logged in.	Noted
Deletion of transactions			
3.17	Is it possible to delete a transaction?	No, by design every action in the platform forms part of an audit trail by user for regulatory purposes.	Noted
3.18	If so, then how are deletions controlled by the system?	non applicable	-
3.19	Are deleted transactions retained in the audit trail (see below) and denoted as such?	A deleted transaction is not relevant in AMLCC - this is an accounting function not an AML regulatory issue. All AML regulatory steps form part of the audit trail and cannot be deleted.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
Audit trails			
3.20	Does the system have an audit trail (log) which records all changes to transactions in the system?	Yes AMLCC has a detailed audit trail with a time and date stamp as detailed in later questions.	Noted
3.21	Does this log also record any system error messages and/or any security violations?	No for the users audit trail. The platform code has a full audit trail in GIT. Access to AWS IAM users also has an audit trail.	Noted
3.22	Is it possible to turn off or delete the audit trail?	No the audit trail is an automated part of AMLCC which is crucial for a user to comply with the AML regulations.	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 all details are logged and unique to time, date and user.	Noted
3.24	Are all master file changes recorded in the audit trail?	AMLCC has a full audit trail (time and date stamped) including a history of all AML policies and all firm wide and client risk assessments and any changes to them. All employee and senior management training undertaken on the platform is recorded along with test results. All staff are also required to review and acknowledge any updates to the firm AML Policy. Users are able to upload documents to a risk assessment or to a client file generally and these are stored in the Document Management area. This also includes copies of documents generated should a user choose to use the third party client identity validation and verification checks. Any clients that the firm ceases to act for can be archived by the user but not deleted. The clients full records are saved in their entirety. The same system applies to staff a user no longer employs - all actions and training within AMLCC are recorded and can be archived in the platform. When a user has requested a risk mitigation approval from senior management this is also logged.	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?	Full GDPR information is included in the privacy policy as follows: https://www.amlcc.com/privacy-policy/	Noted
3.26	Describe your use of sub-processors if any?	AMLCC users have access to third party providers at an additional charge and on an optional basis. These are Hooyu, Equifax and CreditSafe.	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?	SaaS system so no need for the user to back it up. The database has a rolling daily back up	Noted
3.28	How often are backups taken and to what point can restores be done?	30 day rolling back ups and the platform can be restored to any point within the last 30 days.	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).	Depending on the nature of the problem, it will either be rolled back or make use of the RDS redundancy. Multi-AZ DB instance, Amazon RDS automatically creates a primary DB instance and synchronously replicates the data to a standby instance in a different Availability Zone (AZ). In case of an infrastructure failure, Amazon RDS performs an automatic failover to the standby DB instance.	Noted
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?	There is no batch input in AMLCC.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
3.31	What features are available within the software to help track down processing problems?	AMLCC is monitored by Sentry 24 hours a day to detect any current or forthcoming problems. Sentry is an issue reporting platform that provides you with "real-time insight into production deployments with info to reproduce and fix crashes". It notifies you of exceptions or errors that your users run into while using your platform, and organises them for you on a web dashboard.	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 there is a comprehensive user menu.	Confirmed
4.02	Are these menus user/role-specific?	Yes each individual role see a different menu.	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?	Partly, users can changes some fields of data. Changing others will not need re configuration but would need manual intervention, but that would be an exceptional circumstance.	Noted
4.04	Does the software provide input validation checks such as: - [account] code validation? - reasonableness limits? - validity checks?	Yes (eg telephone numbers or previous user numbers) but as the product and user base is expanding this is under constant review.	Noted
4.05	What control features are within the software to ensure completeness and accuracy of data input?	There is field input validation for quality and there are alerts and restrictions if all data fields are not completed.	
4.06	How does the software ensure uniqueness of the input transactions? (i.e. to avoid duplicate transactions)	Where applicable duplications are rejected.	
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 there is validation on the inputs, this can be stopping illegal characters for subjects like SQL injections prevention, to user guidance when it is only applicable to enter certain character types.	Noted
4.08	Is data input by users validated by routines running on the server before data files are updated?	Yes, validation on files being upload are present, only certain file types are allowed	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?	Yes maximum length where applicable and unacceptable characters are disallowed.	Noted
4.10	Are responses to erroneous data input clear so that they do not lead to inappropriate actions?	Yes the platform flags any data inputting errors.	Noted
4.11	Does the software have an automatic facility to correct/reverse/delete transactions?	Warning messages are flagged to the user.	Noted
4.12	If yes, are these logged in the audit trail?	No.	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?	Yes data entries are controlled.	Noted
4.14	Are messages provided to users clearly explaining whether the data entry or file upload has been processed successfully or not?	Yes a user receives a 'success' message.	Noted
Import and export of data			
4.15	Can files/attachments be uploaded and stored against any transaction?	Yes where applicable - client files, firm wide and client risk assessments and document storage.	Noted
4.16	Is there an additional charge made for storage of uploaded files? - If yes, please indicate the cost.	No additional charge is levied.	Noted
4.17	Can data be imported into the system from multiple types of files, e.g. XLS, text, CSV?	Yes the users can upload client details to the platform using a .CSV file format. A template structure of the data required is provided through the platform via an excel spreadsheet.	Noted
4.18	Explain how the system validates imports into the system and what happens to any import which fails?	All users are provided with detailed instruction on the client upload process. If the instructions are not clearly followed the upload fails.	Confirmed
4.19	Are imported /interfaced transactions detailed in the audit trail? *[See also 3.27]*	Yes where applicable.	Noted
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?	No. Any relevant report downloads are in PDF format.

Reports will only ever be produced in PDF format. This is specifically so they can never be altered. All PDF reports are a dated and time stamped 'moment in time' that form an extremely important audit trail for a regulated firm. It will never be appropriate to allow these reports to be exported in another format which would mean they could be changed retrospectively and therefore present an incorrect record of the regulated firms compliance, risk management and education. | Noted |

Ref	Requirement	Vendor Response	Reviewer Comments
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)?	Not applicable.	-
4.22	Does the software provide automatic recalculation, where appropriate, of data input? (e.g. VAT)	Not applicable.	-
4.23	Is a month/period-end routine required to be undertaken?	Not applicable.	-
4.24	Is it possible to delete accounts if the balance is Nil but transactions have been recorded against the code?	Not applicable.	-
4.25	What is the size and format of reference numbers and descriptions within:- - Ledgers? - Stock? - Currencies?	Not applicable.	-
4.26	How does the software guard against/warn about duplicate account numbers on set up?	Each account has a unique reference which cannot be duplicated.	Noted
4.27	How does the software enable the traceability [from, to and through the accounting records] of any source document or interfaced transaction?	Not appicable.	-
4.28	What drill down/around functionality is available within the software?	A number of AMLCC functions have the ability to drill down within the platform such as client dashboard.	Noted
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?	Not applicable.	-
Report writer			
4.30	Does the system have an in-built report generator or is a third-party solution used (if so please specify)?	Built into the platform.	Confirmed. Used to produce final reporting pack.
4.31	Is the report writer based on a standard SQL-type approach and is it flexible and easy to use?	Yes based on an SQL approach.	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?	Not applicable.	-
4.33	Is a comprehensive data dictionary provided to aid field selection?	Not applicable.	-
4.34	Does the system provide a library of reports and templates which can be amended, saved and re-run?	Yes all key parts of the platform can be saved and rerun such as AML policy and firm wide and client risk assessments. The AML policy template can be fully amended. The firm wide and client risk assessment questions cannot be amended but the risk assessments enable users to choose the appropriate answers based on the risks they face. Comments and supporting documents can be added to all risk assessment questions to explain how the firm is managing and mitigating risks. Effective risk mitigation action will allow the firm to select risk mitigated as an answer that would otherwise be high risk.	Noted
4.35	Can users create their own reports? If so, what are the controls on users doing this?	The content of all reports is changeable but not the format or structure. A crucial feature of AMLCC is the AML policy and the business wide and client risk assessments must be tailored to the unique needs of each firm.	Noted
4.36	Can users create saved searches / filters / queries?	No but AMLCC is not a transactional system.	Noted.

Ref	Requirement	Vendor Response	Reviewer Comments
4.37	Can regular reports be added to user menus in the appropriate area of the system?	Reports can be generated by the user and downloaded in a PDF format for submission to regulators, law enforcement and for internal review. Reports are added to the appropriate part of the platform whether it is for the firm overall (AML Policy or firm-wide risk assessment) or related to an individual client (entity type specific client risk assessments). These are time and date stamped and form a key part of the firm's compliance audit trail.	Noted
4.38	Does the system support the production of on demand (interactive) and scheduled batch reports?	Not applicable.	-

Ref	Requirement	Vendor Response	Reviewer Comments
5.	**USABILITY**		
Ease of use			
5.01	Does the solution provide a multi-language user interface?	The 'backend' of AMLCC has been rebuilt over the last 18 months. Part of this process was to support multiple currencies and multiple languages. AMLCC is currently only available in the UK but once it launches in foreign countries these will be utilised.	Noted
5.02	Does the system allow for customizable branding and UI (e.g. corporate colour palate, upload company logo, etc)?	Customisable branding is not relevant as AMLCC is used by a regulated professional not by their underlying clients or anyone else. It is therefore a compliance, risk mangement and education tool that is purely for internal use by the regulated entity to comply with its legal obligations.	Noted
5.03	Does the system have a similar look and feel and overall and consistency between screens and modules?	Yes very consistent look and feel.	Confirmed
5.04	Is data entry easily repeated if similar to previous entry?	All data needs to be input separately.	Noted
5.05	Does the software prevent access to a record while it is being updated?	No, this is not present.	Noted
5.06	Is there locking at file or record level?	Not applicable.	Noted
5.07	Does the software allow for the running of reports whilst records are being updated?	No a record needs to be completed and saved before a PDF report can be run.	Noted
5.08	Can timestamps or user comments be added to transactions?	User comments can be added to all questions in a firm wide or client risk assessment as well as the AML policy.	Confirmed
5.09	Is there the ability to store preferences and default values on a per-user basis. e.g. department/team/user?	A fundamental feature of AMLCC is the users ability to tailor the platform to the unique needs of their business. Each individual tool in the platform is required by the AML regulations and is a legal requirement for regulated firms. The tailoring also includes, for example, the ability for the MLRO to define certin functions a staff user can carry out in the platform.	Noted
5.10	Does the system have the ability to provide user-defined fields with associated validation of data input?	No a user cannot define their own field. However, we work closely with users and have added additional data field following user requests.	Noted
5.11	Can the system provide users with reminders and notifications e.g. workflows?	Yes there is a full document management section with a reminder function as well as reminders being flagged on the user's client dashboard.	Confirmed
5.12	If the system provides workflows, does it have functionality to substitute/delegate authorisations?	Method of completed the relevant tasks is recommended rather than compulsory. Authorisations cannot be substituted or delegated as this would be inappropriate within the AML regulations.	Confirmed
5.13	Is there the ability for users to define and configure layouts of letters and forms?	No all PDF downloadable reports are in a standard format and canot be edited once generated as they are a 'snapshot in time' to allow the user to have an appropriate audit trail of AML compliance, risk management and education. However, templates available in the 'firm support' section can be written and configured as appropriate to the user as these are available to be useful to the user rather than for AML regulatory purposes.	Noted
5.14	Can users save the parameters of searches?	No saving search parameters is not possible.	Noted
5.15	Does the system have a "universal search" option, allowing a search to be undertaken over all modules of the system?	There is a split of information within AMLCC between that which is unique to the business and that which is specific to a user's individual clients. The search function focuses on the sections relevant to clients. The firm can access its unique documents through the user menu and search in the document history.	Noted
5.16	Can the system store menu option 'favourites' on a per user basis?	Not applicable.	-

Ref	Requirement	Vendor Response	Reviewer Comments
5.17	Can a user open multiple windows accessing the same or different modules of the system?	Yes multiple windows can operate different parts of the platform. However, a user must be aware that if one window is logged out on the 20 minute automatic logout due to lack of activity function, then all windows will be logged out.	Noted
5.18	Can more than one software function be performed concurrently?	By different users in the same account.	Noted
User documentation and training			
5.19	Is the manual provided as: - hard copy - on CD - by download - via a web-interface?	AMLCC no longer provides a manual. Education is built throughout the platform via training videos and guidance and mitigation steps. Users are also provided with comprehensive information, FAQs and videos on amlcc.com.	Noted
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?	Not applicable.	Noted
5.21	Is context-sensitive help available within the system?	At many points in AMLCC the user is provided with a 'pop up' box to explain points in more detail. There are also guidance and mitigation step added to many firm and client risk assessment questions where appropriate.	Noted
5.22	Is the manual and/or help editable by the user (subject to the permissions matrix)?	Not applicable see 5.19.	-
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 this is not possible.	Noted and not unusual for this sort of (SaaS) system.
5.24	Please detail the training options available?	AMLCC currently has complete 'business wide' and 'sector risks' training for all staff and senior management as well as a separate training video for the 'MLRO / Senior Management' to understand their additional responsibilities. However, Gentium UK (a worldwide government body AML training provider) are currently in the process of starting to create a library of additional 'non-compulsory' videos which may be of interest to users around the subject of AML. The first 4 subjects have been agreed to cover cryptoasset and cyber fraud training. All training is kept fully up to date with the latest legislation. Within the firm wide and client risk assessments, where necessary, guidance and suggested mitigation steps are included as relevant to individual questions which continue the education theme.	Noted. There is comprehensive training functionality within AMLCC.
5.25	Who provides training: - Software House? - VAR?	The software house but please see answer above.	Noted
Support and maintenance			
5.26	How is the software sold: - Direct from the software house? - Via a Value Added Reseller (VAR) or Integrator?	AMLCC is a subscription only service sold directly via amlcc.com.	Noted
5.27	How is the product supported: - Direct from the software house? - Via a Value Added Reseller (VAR) or Integrator?	Direct from AMLCC.	Noted
5.28	Do VARs have to go through an accreditation process?	Not applicable.	-
5.29	Is the software sold based upon number of named users or a number of concurrent users?	A standard annual subscription includes access for the MLRO and 3 members of staff. Any additional staff users can be purchased at an additional charge.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
5.30	The supplier should detail the support cover options available, covering: - The hours provided? - Associated costs? - The global regions covered?	The user support office is open from 8.30am to 5.30pm Monday to Friday. Ad hoc support is given to users out of hours and over the weekend by AMLCC management.	Noted
5.31	Detail the process by which customers raise support requests and how these can be viewed/managed?	Most support requests come via email but a number of users call the support helpline.	Noted
5.32	Please note the methods of support available: - Telephone? - Internet chat? - Remote access to customer workstation? - Other, please specify?	Support is available via email, telephone and zoom call as necessary.	Noted
5.33	Do you offer service credits for failure to meet performance around SLA and uptime (if applicable)	No.	-
5.34	What is your escalation path for tickets which have not been resolved within a reasonable time?	All support requests are dealt with in a timely manner on the same day. If this is not possible due to development team time needed then a user is kept fully informed.	Noted
5.35	How often are general software enhancements provided?	As necessary and in response to legislation changing or regulatory updates.	Noted
5.36	Will they be given free of charge?	Yes all upgrades are included within the annual subscription.	Noted
5.37	How are enhancements and bug fixes provided to customers?	Enhancements and bug fixes are seamless from a user perspective.	Noted
5.38	Is "hot line" support to assist with immediate problem solving available?	Yes within the opening hours of the client support office and out of hours upon request.	Noted
5.39	If so, is there an additional cost involved?	No additional cost involved for support.	Noted
5.40	At what times will this support be available?	The user support office is open from 8.30am to 5.30pm Monday to Friday. Ad hoc support is given to users out of hours and over the weekend by AMLCC management.	Noted
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?	It is essential a firm's AML data is not accessible by underlying user clients. Although we are aware that packages exist that only provide access to regulated firms' data (not its underlying clients), the features and structure of AMLCC are its own intellectual property and integration with other systems data would be of little benefit. The only data that could be imported would be basic client details which is already available through the client upload function. Exporting data from AMLCC, other than in PDF reports that cannot be altered, would be inappropriate within the regulations.	Noted
5.42	Can definable links to spreadsheets be created?	Not applicable.	-
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 any PDF document can be saved in the platform - encrypted and extremely secure.	-
5.44	Can documents be scanned into a secure repository?	PDF documents can be uploaded into a secure repository.	Noted, but no scanning facility.
5.45	Does the system provide data migration tools for transactional and master data sets (e.g. employees customers, suppliers, journals, invoices).	Not applicable.	-
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?	No this is not possible.	-
5.47	Does the system support mobile working?	AMLCC is a cloud based SaaS system so can be accessed from anywhere. However, due to the breadth of information and functionality it would not be practical to use on smaller devices.	Noted, within the practical limits of the screen size of mobile devices.

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?	Amazon Web Services - Republic of Ireland	Noted
6.02	Does the customer get a choice of the jurisdiction in which their data resides?	No, this is not available as the data is held in the appropriate AWS location for the region.	Noted
6.03	What certification(s) do you or your platform operators hold relating to your data centres and your business operations?	Data centre compliance can be read here - https://aws.amazon.com/compliance/programs/	Noted
6.04	Do you or your platform operator have an SSAE16 (System and Organization Controls) report available?	AWS computing environments are continuously audited, with certifications from accreditation bodies across geographies and verticals, including SOC 1/SSAE 16/ISAE 3402 (formerly SAS 70), SOC 2, SOC 3, ISO 9001 / ISO 27001, FedRAMP, DoD SRG, and PCI DSS Level 1	Noted
6.05	What are the physical controls over the:- - Premises? - Fileservers? - Communications equipment?	AWS has extensive physical control, more detail can be found here - https://aws.amazon.com/compliance/data-center/controls/	Noted
6.06	Is the space in this/these data centre(s) shared with any other companies?	AWS Cloud so yes, but that does not mean access etc is granted to anyone else	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?	Cloud infrastructure	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?	This is handled by AWS and the virtual products AWS supplies	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?	This is handled by AWS and the virtual products AWS supplies	Noted
6.10	How is [Internet] communication traffic monitored to identify potential problems before they happen: - From a performance perspective? - From a security standpoint?	Cloudwatch is an AWS monitoring service where we have alerts and we also use Sentry. There are also identified trends and restriction ability at the Domain Name System (DNS) level managed by Cloudflare. AMLCC is monitored by Sentry 24 hours a day to detect any current or forthcoming problems. Sentry is an issue reporting platform that provides you with ""real-time insight into production deployments with info to reproduce and fix crashes"". It notifies you of exceptions or errors that your users run into while using your platform, and organises them for you on a web dashboard.	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?	The AWS networks monitor for suspicious or malicious activity and their own firewalls would restrict traffic in a Brute force scenario if it was detected. We can also monitor suspicious activity in Cloudflare and add rules on traffic, or restrict traffic here as well.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
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?	All data exchanges outside of AWS are fully encrypted.	Noted
6.13	Is data on your servers encrypted at rest?	Database encryption is AWS managed encryption AES-256 encryption algorithm	Noted
6.14	Is a test environment provided to test configuration changes? If so, is there an additional charge for this?	Software changes are generally regulatory driven changes and therefore have to be adopted by the users - these are not a matter of choice. We do have a number of regulated firms who will test new developments for us where we deem it to be appropriate or necessary but this is not widely offered to large numbers of users. We do not charge a user for this help.	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?	Using the cloud computing model, means that no one in AWS that does have access to hardware or network access can identify where the application is on the their infrastructure, and also all data is encrypted at rest so unless they are then logging in from a user view the data cannot be exposed to them.	Noted
6.16	Are you subject to any legal or regulatory requirements obliging you to retain a copy of customer data?	AMLCC is not subject to any legal or regulatory requirements to retain customer data. All data is retained for 'live' users. Our Terms and Conditions clearly outline our data handling after a user has decided not to resubscribe.	Noted
6.17	Who will be able to access or see customer data?	Only the user with their unique username and secure password can access an AMLCC account. The development team can only read the code in the account unless expressly granted access by a user with their username and password which will then be immediately changed. Development team access to a user's account is logged but this has only been necessary twice to date.	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.	Limit access to Data, Client Equipment and Client Systems based upon a principle of least privilege which limits access to the lowest permission level required to perform Services.	Noted
6.19	Explain the release management procedures in place and the associated segregation of duties ?	We have a Continuous Integration/ Continuous Development pipeline, so the releases are seamless and automatic. A designated member of staff approves the release and then the process is automatic	Noted
6.20	Is there sufficient segregation of duties preventing system developers from accessing and changing live applications and data files?	Yes, only one senior member of staff at a time has access to the production infrastructure	Noted
6.21	Explain the review and approval procedures covering system operations staff when emergency changes need to be made to live applications and data?	The Continuous Integration /Continuous Development allows us to push through emergency fixes, but they still go through the same process prior to being released. They are reported, recreated by a member of staff, fixed, tested and released.	Noted
6.22	Is an audit trail always maintained of these emergency changes?	Yes, there is an audit trail in Git, the code management repository and also in Jira the case management system that hold all of the history for any case/issue/feature/bug/task	Noted
6.23	What procedures are in place when members of staff leave to ensure that their system access is stopped?	Their email box is locked, and all passwords for systems are changed. WIth their email locked they cannot then attempt to recover or reset passwords.	Noted
Platform and service levels			
6.24	Which databases can be used (Hosted) or are used (SaaS)?	The SaaS model is used, Database is MySQL using the AWS RED Service	Noted
6.25	What forms of user authentication are supported e.g. user names, passwords certificates, tokens etc.?	For user access it is Username and Password, for encryption of data it is Tokens	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.26	What is the proposed product/service availability percentage?	We are looking to a achieve 99.99	Noted
6.27	What percentage availability has been achieved over the past 12 months?	The platform has been migrated in the last 12 months, so the history is not complete but we are targeting and at 99.95%, excluding planned maintenance	Noted
6.28	Is a service level agreement ("SLA") offered regarding: - Service availability? - Data recovery?	AWS offer a Service Level agreement for the products within the cloud account, there is currently not a service level on data recovery. The platform's terms and conditions include details of the platforms service availability.	Noted
6.29	Is the service available 24x7 or are there downtime periods for maintenance?	Yes the platform is available 24X7, AMLCC reserve the right in their terms and conditions to bring the platform down for planned maintenance.	Noted
6.30	Is the customer made aware of maintenance periods in advance?	Yes, the only exception to this would be responding to an emergency situation. Planned maintenance windows are added to the login screen of all users accounts and details are also sent by email.	Noted
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?	No client software is required, yes it works completely within the clients 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?	Not applicable	-
Platform security			
6.33	What security steps are taken to prevent and detect intrusion attempts?	Monitoring, firewalls, and a formal software development lifecycle.	Noted
6.34	Is firewall hardware and software used to protect the live systems from unauthorised access?	The firewall is supplied by AWS, information this service can be found here, https://aws.amazon.com/network-firewall/?whats-new-cards.sort-by=item.additionalFields.postDateTime&whats-new-cards.sort-order=desc	Noted
6.35	Which monitoring software is used to create alerts when intrusion attempts are suspected?	Cloudflare, Cloudwatch & Sentry.	Noted
6.36	Are designated staff responsible for receiving and urgently responding to these alerts?	Yes, the senior developers and the development operations team.	Noted
6.37	Have clear procedures been established for identifying and responding to security incidents?	Yes there is an escalation procedure to gather senior staff and AMLCC management	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.	Yes, we have a Patch Management Policy	Noted
6.39	List the procedures and software tools in place to prevent or detect and eliminate interference from malicious code, such as viruses?	All work stations are install with AV, there is detection for adverse behavior within the AWS firmware and Cloudflare.	Noted
6.40	Is a system log maintained by the service provider that details - User access? - User activity? - Error messages? - Security violations?	From an engineering perspective AWS holds a log of user access for 2 years. From an end user perspective the platform itself hold a log of user activity, the user access is held in the logs for 2 years. Errors are tracked with Sentry (see information in 3.31) and there is a retained history. We have no instances of security violations to date.	Noted
6.41	Is this log available to the customer?	Not available to the user.	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 there have been no unauthorised access attempts.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
6.43	Is penetration testing regularly carried out by (please indicate frequency of tests): - Staff specialising in this field? - External specialists?	Penetration tests are carried out annually, and at the end of larger deliveries of new features. These are a combination of external and specialist personnel.	Noted
6.44	If penetration testing by a specialist is not performed regularly, please indicate the main procedures in place to identify weaknesses?	Penetration tests will be carried out as above. There are also a number of internal monitoring systems previously described.	Noted
6.45	Are security procedures regularly reviewed? Please indicate frequency of reviews.	We review these with senior AMLCC management quarterly	Noted
6.46	What security reporting is provided demonstrating compliance against certification(s) and policy(ies)?	Data and reporting from AWS, Cloudflare, Sentry and Cloudwatch are used to verify compliance	Noted
6.47	Are any security breaches communicated to customers?	There have not been any to communicate	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 of data are rolling, 30 days. The entire Database is backed up, the backups are stored in AWS, with only named management and top level senior technical staff, the backups are encrypted to the same level as the Database	Noted
6.49	How frequently is a test-restore of backups undertaken?	Every 6 months	Noted
6.50	Can the provider restore from a backups that it has taken at a customer request?	As a cloud based platform, AMLCC has a rolling back up over the previous 30 days. As a SaaS system, users do not need to download a version of the platform onto their own device.	Noted
6.51	Does a customer have the ability to undertake their own backups?	As a cloud based platform, AMLCC has a rolling back up over the previous 30 days. As a SaaS system, users do not need to download a version of the platform onto their own device.	Noted
6.52	If so, can a customer restore data a backup that they have taken?	Not applicable	-
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 use of AWS migrate all of these as well as the built in redundancy of RDS	Noted
6.54	How often are these plans tested?	Quarterly	Noted
6.55	How often are these plans reviewed and updated?	Quarterly	Noted
6.56	What are your: - Recovery Point Object (RPO) standards? - Recovery Time Objective (RTO) minimum standards?	RPO is currently 24 hours, however this is assuming the issue is something that means the redundancy in RDS is not able to be used, with RDS, it is real time so we maybe minutes of lost data, if any at all. RTO is 4 hours, but again this is assuming we are at a stage of bringing up a Database backup, we would expect it to be achieved must faster with the characteristics of RDS.	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?	Based on the Server settings	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?	Mitigated in the terms and conditions for users, and the company's data retention policy. AMLCC was established in 2008 and has a very strong user base of over 10,000 UK accountants who all pay an annual subscription either in one single payment or on a monthly basis. Therefore, if the Directors were ever in a position of wanting to exit the business it would be highly likely to be sold as an ongoing concern rather than closed.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
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?	Please see answer above in 6.58.	Noted
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, roles are shared	Noted
Platform change management			
6.61	Describe your approach to upgrades including what option customers have not to take upgrades (if any)?	Customers do not have the ability to request upgrades, and upgrades to the platform are included in the SDLC	Noted
6.62	Are users able to test the application before new versions go into live use?	Software changes are generally regulatory driven changes and therefore have to be adopted by the users - these are not a matter of choice. We do have a number of regulated firms who will test new developments for us where we deem it to be appropriate or necessary but this is not widely offered to large numbers of users.	Noted
6.63	Are users given notice before application changes are applied to the live system?	Users are given notice before major releases, but not minor emergency releases	Noted
6.64	Are changes delivered into the live environment "switched off" to enable users to test them before enabling them for their environment?	No, this is not an approach we follow. Software changes are generally regulatory driven changes and therefore have to be adopted by the users - these are not a matter of choice. We do have a number of regulated firms who will test new developments for us where we deem it to be appropriate or necessary but this is not widely offered to large numbers of users.	Noted
6.65	Describe what testing and QA processes are undertaken before upgrades and other changes are made live/available to customers?	Part of the SDLC, QA testes and reopens and case or issue until its is successfully passed	Noted
6.66	If a hosted system, explain the release management procedures in place and the associated segregation of duties?	The main development team commit code to a Development instance, from here a Test or Staging instance is updated, and once a rleases is passes on Staging it is moved to production. Only designated staff have the ability to update production	Noted
6.67	Are users informed when they next login of the application changes that have gone into live use?	If relevant (a significant change), all users are notified by email and often via a message on the login page as well.	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.	No action is necessary from the user.	Noted
Subscription options			
6.69	What is the minimum level of commitment must the customer sign up to, e.g. 36 months?	12 Months	Noted
6.70	Where online payment is used, what type of security is used to protect sensitive information?	We use the Barclaycard payment gateway and AMLCC does not host the payment page or ever handle the payment data, it all resides with Barclaycard.	Noted
6.71	Where online subscription / payment is used, is an invoice provided to the customer and, if so, in what format?	Yes an invoice in PDF format	Noted
6.72	When subscriptions need to be renewed, what advance notice is provided and what is the time limit for renewal?	One month, and then a series of future reminders	Noted
6.73	Is there a procedure for late renewal and is there a time limit after which subscriptions cannot be renewed?	Yes, the system will lock a user out from the features but allow them to regain entry by paying their missing subscription	Noted
6.74	How soon after creating or renewing a subscription (if applicable) can the system / service be used?	It will be available immediately	Noted
6.75	What notifications / confirmations are provided to the customer regarding subscriptions and payments?	Annual subscription reminder emails are sent out one month, one week and 3 days before the subscription is due. There is also a pop up message within a users account in the month renewal is due.	Noted

Ref	Requirement	Vendor Response	Reviewer Comments
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?	An AMLCC user can request a 'data download' of any data they have themselves added or uploaded to the platform. There is a charge of £100 to carry out this request. No information that contains the intellectual property of AMLCC is available to someone who is not a 'live' user and can no longer be used going forward as detailed in our Terms and Conditions.	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?	Historic user records can be downloaded from AMLCC by any 'active' user. If someone is no longer a 'live' user and wishes for a download of the data they added to the platform this must be requested within 10 days of cancelling their subscription.	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?	Our Terms and Conditions allow for all customer data to be destroyed after 10 days of leaving the platform. There is currently no certification	Noted
6.79	What is your processes regarding disposal of end-of-life and failed hardware devices that were used to operate your service?	All 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?	Not applicable, we are not producing accounting reporting.	-
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?	No, just web browser	Noted
6.82	What browser versions are support: - On desktop/laptop (PC, Mac, Linux)? - On Tablets? - On mobiles?	Google Chrome (latest stable version) Firefox (latest stable version) Microsoft Edge (latest stable version) Safari on iOS (latest iOS) Chrome on Android (Android 8 and above) Safari on MacOS (latest stable version)	Noted
6.83	Is access to the reporting facilities and data controlled by the same procedures as access to the main application?	Yes, this is the same.	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?	It is the same so not applicable.	-
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?	Reports will only ever be produced in PDF format. This is specifically so they can never be altered. All PDF reports are a dated and time stamped 'moment in time' that form an extremely important audit trail for a regulated firm. It will never be appropriate to allow these reports to be exported in another format which would mean they could be changed retrospectively and therefore present an incorrect record of the regulated firms compliance, risk management and education.	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?	They are stored on the Web Server, and yes secured with the same encryption and storage approach as all user data.	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?	No data is stored on the users computer unless it is downloaded, and other users with the correct role can view the report, users without the correct roles cannot view the reports, and yes all reports are dated.	Noted
6.88	Are communications between the browser and the server encrypted for any report related communications?	Yes this is 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?	The reports are not protected dynamically, but yes a user can also see a full history of past reports	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?	This is not really relevant to reports, but the dashboards allow drilling and some document views allow data ranges	Noted
6.91	Can report data be reliably copied and pasted direct from browser viewable reports to an MS Excel spreadsheet retaining any table layout?	Reports will only ever be produced in PDF format. This is specifically so they can never be altered. All PDF reports are a dated and time stamped 'moment in time' that form an extremely important audit trail for a regulated firm. It will never be appropriate to allow these reports to be exported in another format which would mean they could be changed retrospectively and therefore present an incorrect record of the regulated firms compliance, risk management and education.	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?	All reports download in PDF format and are stored in the platform. Incomplete reports would not be generated.	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?	The AML client risk assessments differ between multiple client types such as sole trader, corporate, personal, trust, etc. As part of the firm set up, a business is required to select the regulated services it offers in a dedicated firm services section. For each client the user must select which services are provided to that client. The client services are automatically cross referenced to the firm services to identify attempts to select a service to a client that the firm has not stated it offers.	Confirmed
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?	AMLCC has a full audit trail (time and date stamped) including a history of all AML policies and all firm wide and client risk assessments and any changes to them. All employee and senior management training undertaken on the platform is recorded along with test results. All staff are also required to review and acknowledge any updates to the firm AML Policy. Users are able to upload documents to a risk assessment or to a client file generally and these are stored in the Document Management area. This also includes copies of documents generated should a user choose to use the third party client identity validation and verification checks. Any clients that the firm ceases to act for can be archived by the user but not deleted. The clients full records are saved in their entirety. The same system applies to staff a user no longer employs - all actions and training within AMLCC are recorded and can be archived in the platform. When a user has requested a risk mitigation approval from senior management this is also logged.	Confirmed. Basic changes to company details are not logged. Full audit trail for all regulatory issues of the system: - Staff training records. - All changes to firm policy, firm risk assessement, and client risk asssessments are logged.
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.	The 'backend' of AMLCC has been rebuilt over the last 18 months using a Laravel framework broken down into MVC parts with PHP language. Part of this process was to support multiple currencies and multiple languages. AMLCC is currently only available in the UK but once it launches in foreign countries these will be utilised.	Noted
7.04	Does the system support multiple languages?	The 'backend' of AMLCC has been rebuilt over the last 18 months. Part of this process was to support multiple currencies and multiple languages. AMLCC is currently only available in the UK but once it launches in foreign countries these will be utilised.	Noted
7.05	Does the system provide inbuilt workflow functionality?	Our website amlcc.com contains a 'how to use AMLCC' video and this is also sent to all new users upon sign up. it is important that new firms follow a recommended set up process. However, the fluid nature of AML means that users will need to access different parts of the platform depending on changing circumstances and risks. The firm and client dashboards keep an up to date picture for each firm of outstanding or upcoming matters that need to be actioned.	Confirmed. There are a set of steps and a recommended order to undertake these.
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?	The platform is designed to be accessed through PC or laptop due to detailed nature and breadth of the content.	Confirmed. Screen size will be the limiter.

Ref	Requirement	Vendor Response	Reviewer Comments
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?	The platform is a SaaS system and auto-save is set for all users by the system. Where a user is working on parts of the platform such as risk assessments that can manually save their work without generating a new risk assessment until they choose to.	Confirmed
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?	All users need to logged in online with a live internet connection to use the platform. The platform is dynamic and cross references different parts of a firm's account stored within the cloud and therefore requires a live connection.	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?	The platform provides access at an additional charge to Hooyu and Equifax for third party personal identity validation and verification checks. There is also access to a third party provider of DBS checks (Gentium UK) but this is not integrated to AMLCC. A user can also purchase individual company checks via Companies House.	Noted
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.	Clients of an AMLCC user do not have access to the AMLCC platform. This would not be appropriate within the nature of the UK's AML regulations.	Noted
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?	Not applicable.	-
7.12	What end-user computing platforms are supported for access, e.g. Windows, Mac, iOS, Android? And what Internet Browsers are supported?	All platforms and browsers as a cloud based SaaS system with no user download required.	Noted
7.13	What Accessibility standards have been adhered to in the design of the portal?	Not applicable.	-
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?	Yes the firm's details automatically pre-populate the firm details in the platform.	Confirmed
7.15	If so, is there the option to subsequently amend the Firm details?	Some of the firm details details can subsequently be changed by the user but some which are greyed out (such as supervisory body) need to be amended by the AMLCC user support team after they have received email instructions.	Noted
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?	As part of the firm set up, a business is required to select the regulated services it offers in a dedicated firm services section. For each client the user must select which services are provided to that client. The client services are automatically cross referenced to the firm services to identify attempts to select a service to a client that the firm has not stated it offers.	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 firm services can be amended. However, there is an automatic checking system built into the platform which stops a user deselecting a service they have already said they offer a client in a risk assessment.	Confirmed. If no longer provide a service would need to update all the current client risk assessements to remove that client service option.

Ref	Requirement	Vendor Response	Reviewer Comments
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?	As an online SaaS system a user receives a secure, encrypted login username and password before they can access the platform. The business initially sets up a firm account and then from there the MLRO account is set up. The MLRO sets up all staff users of AMLCC with there own login access and allowed functions within AMLCC. Our recommended steps are detailed in the 'How to use AMLCC' video all users receive on sign up as well as being able to few this via the home page of amlcc.com.	Confirmed. Needs the MRLO user set up to sets up the users.
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?	Upon initial subscription a new business is sent login details to its 'firm' level account. Once in this account the firm must set up an 'MLRO' account. This is a security measure to ensure that if a firm ever parts company with its MLRO for any reason whatsoever, then the MLRO can be 'archived' so they no longer have access to the platform and a new one appointed with their own login details. All actions undertaken by the archived MLRO form part of the audit trail.	Confirmed, as 7.18
7.20	Must the MRLO [user] be created before firm and client risk assessments can be undertaken?	Yes the MLRO account as described above must be set up before firm and client risk assessments are undertaken.	Confirmed, as 7.18
7.21	Must a firm risk assessment be undertaken before client risk assessments can be undertaken?	We recommend a firm risk assessment is completed before the AML Policy and then client risk assessments but we can only recommend this. Our recommended steps (starting with the training videos) are detailed in the 'How to use AMLCC' video.	Confirmed. Not mandated but recommended. Need to understand firm-wide risks before do client assessments.
7.22	Does the system have the ability to provide third-party verification services from within the platform?	Yes a user can pay for 'add on' services which include ID validation checks via Equifax and Biometric ID verification checks via Hooyu.	Confirmed
7.23	If so, can the results be recorded against the clients on whom verification has been requested?	The result of these checks are stored on the relevant client account within the users AMLCC account.	Confirmed
7.24	What third-party services are integrated: - Client [contact] verification? - Client [company] verification? - Digital biometric verification? - Company House firm-details? - Other, please specify?	Within AMLCC a user can access the following for an additional fee: client personal identity validation checks via Equifax (includes checking the electoral roll, sanctions list, halos deceased etc), client personal biometric ID validation checks via Hooyu and company checks via Companies House.	Confirmed
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 a business initially sets up a firm account. From this account the MLRO account is established and archived. The MLRO accounts sets up and archives all staff users. Once a user has been created the platform send them an email containing username and the ability to choose a password within certain parameters.	Confirmed
7.26	If yes, does the system enable the user to change their own details and change their password?	Yes a user can change their own username and password from triggers within the platform.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
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?	AMLCC automatically sets the roles and permissions for each user level. The business initially sets up the 'global user' account which is the 'firm' account. From there the 'MLRO' account is established and controlled. For a sole practitioner and in many smaller firms these 2 account levels will be set up and controlled by the same person. All 'staff' users are set up and controlled from the MLRO account. The MLRO chooses if a Staff user can carry out certain functions within the platform. The MLRO can also establish 'supervisor' read only temporary access to allow a regulatory body to look at the account to carry out an inspection. Only a firm's MLRO can see an internal SAR report made using the AMLCC SAR reporting tool.	Confirmed
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?	Any such appropriate authorisations are automatically set by AMLCC. These include a staff user requesting risk mitigation steps in client risk assessments to be approved by the MLRO and a firm user can only set up and archive an MLRO and an MLRO can only set up and archive either a staff or supervisor access.	Confirmed. A user can be given the options to create and archive other staff.
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 any MLRO or staff user has full access to the client risk assessments. However, only the MLRO can approve 'mitigation steps' proposed by a staff user if a high risk situation has arisen.	Confirmed
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.	Yes a user can give a regulatory body temporary 'read only' access to their full account including audit trail to enable a review to be undertaken. The user activates the read only access by completing the relevant 'supervisor' account details and AMLCC sends the person doing the regulatory review login details as any other user. The firm then removes the supervisors access once the review is completed.	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 any MLRO or staff user can be archived or unarchived at a press of a button. A subscription is not paid for an archived user but for any 'active' user. As previously described there is a full date and time stamped history of actions archived staff have taken in the platform.	Confirmed
7.32	Are there restrictions on more than one user at the Accountant working on the same client risk assessment at the same time?	No there are no such restrictions in place. A firm would need to allocate staff workloads appropriately.	Noted
7.33	Are there restrictions on one user at the Accountant working on multiple risk assessments (for different clients) at the same time?	No there are no such restrictions in place. A firm would need to allocate staff workloads appropriately.	Noted. The user making changes is logged in the audit trail.
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 very easy. The 'user level' is clearly defined in the top right of every screen close to the 'logout' button. To log into a different user level eg to go from firm to MLRO account a user must login and login again with different secure details.	Confirmed
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?	Yes there is a full log of any staff training tests undertaken and the result achieved. Once an AML Policy is created or updated all staff must acknowledge they have read and agree to the AML Policy. There is a full audit trail of these processes with date and time.	Confirmed
7.36	If yes: - Is full history of training modules undertaken kept with each employee? - Are there associated tests with the training modules?	AMLCC logs the training tests relevant to each training video undertaken and the result, not when and how many times a user has watched a certain video. This information is available both to the staff user and to the MLRO.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.37	Is the need to undertake this training forcibly refreshed periodically or as the system or regulations are updated?	All training is updated as regulations or legislation changes. Users are then notified and recommended to rewatch all or parts of a training video. We recommend all users renew their training each year but this is only a recommendation as not in the regulations.	Confirmed
7.38	Are users blocked from undertaking client risk assessments if they have not passed mandatory tests?	We can only recommend that all users follow our suggested steps and in the correct order and the management of the staff users must be done by the relevant MLRO.	Confirmed. Recommend but not an actual block. Training is tracked!
7.39	As training modules are updated are users prompted to update their learning?	All AMLCC users are notified by email or pop up prompts within the platform that any training video has been updated.	Noted
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?	AMLCC currently has complete 'business wide' and 'sector risks' training for all staff and senior management as well as a separate training video for the 'MLRO / Senior Management' to understand their additional responsibilities. However, Gentium UK (a worldwide government body AML training provider) are currently in the process of starting to create a library of additional 'non-compulsory' videos which may be of interest to users around the subject of AML. The first 4 subjects have been agreed to cover crypto asset and cyber fraud training. All training is kept fully up to date with the latest legislation. Within the firm wide and client risk assessments, where necessary, guidance and suggested mitigation steps are included as relevant to individual questions which continue the education theme.	Confirmed
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"?	Yes there is an AML Policy template in the AMLCC platform which a user can tailor to their own firm's needs.	Confirmed
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?	Yes new versions of the AML Policy template will be uploaded by AMLCC as necessary. A firm will be advised to update it's policy with every new version released.	Noted. Details provided of any sections that have changed. But a manual update would be required.
7.43	Can individual sections of the Policy be amended separately, rather than the whole document needing to be changed in one go?	Yes the AML Policy template is broken down into sections and each section can be amended individually.	Confirmed
7.44	Is a history of changes retained in the system?	An audit trail of all previous versions of a firm's AML Policy is logged ad stored on the platform. Changes are only logged if an updated version is actually 'saved' on the platform.	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?	Yes all users from a firm will need to read and acknowledge any changes to the firm's AML Policy via the platform.	Confirmed. After the new policy has been "Published" users then have to confirm on login. (Once read this is logged in the training audit).
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?	Yes this is logged in a user's training record and the MLRO has full visibility of which staff users have done so in their own records.	Confirmed
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	The firm wide risk assessment considers the risks set out from various sources including the UK AML regulations and National Risk Assessment. The risks are not restricted by the firm services selected but are set to consider the risks associated with regulated services.	Confirmed. "Firm services" link to the Firm Risk Assessment.

Ref	Requirement	Vendor Response	Reviewer Comments
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.	The firm wide risk assessment considers the risks set out from various sources including the UK AML regulations and National Risk Assessment. The risks are not restricted by the firm services selected but are set to consider the risks associated with regulated services.	Confirmed
7.49	Are some questions in the Risk Assessment mandatory and others optional depending on the services selected by the firm?	All questions are mandatory.	Noted
7.50	Does the system show progress through the Risk Assessment: which sections have been started and which completed?	Yes as the user progresses through the firm wide risk assessment the status of each section will move from 'not started' to 'in progress' to 'completed' with colour changes to the headers to accompany this.	Confirmed
7.51	Does the system allow subsequent amendment of individual entries, without the need to walkthrough complete sections of questions again?	Yes users can access individual questions and make changes as they wish which will be logged as part of the audit trail.	Confirmed
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?	Yes each question has a 'high' or 'low' risk outcome initially. Any high risk outcome may be 'risk mitigated' by the firm's MLRO with notes added to explain how that has been achieved. Risk mitigation steps are added to the question where appropriate.	Confirmed. The question is the risk (and is high or low).
7.53	Do all the questions have additional guidance and useful links should further clarification be required by the user?	Guidance and mitigation steps have been added where considered useful.	Confirmed
7.54	Is a comments box available under each question, to provide the facility to capture additional information relevant to the Firm Risk Assessment?	Yes a comments box is available to be completed if wished for each question. Users can also add any relevant supporting documents to each question.	Confirmed
7.55	Are suggested risk mitigation steps included against each question?	Guidance and mitigation steps have been added where considered useful.	Confirmed. Suggestions are made but the firm needs to add details into the comments.
7.56	Are high risk areas clearly highlighted?	Every question has a potential high risk outcome.	Confirmed; see 7.52
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?	A summary of the question outcomes is provided on the firm wide risk assessment home page. Once a user accesses the update firm risk assessment section those same question outcomes are displayed and can be clicked through to see each question level per section.	Confirmed. Summary shows categories and number of qns/ans in each. Can subsequently filter questions by category. And a "red flag" againsta a section shows a section with high risk questions.
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?	Yes as the user progresses through the firm wide risk assessment the status of each section will move from 'not started' to 'in progress' to 'completed' with colour changes to the headers to accompany this.	Confirmed. Sections go from white to "green" when completed.
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?	No every question must be completed.	Confirmed. Uncompleted questions are coloured light-orange.
7.60	Can a completed section be manually marked as not completed?	No this is not possible.	Confirmed
7.61	Does the system have search functionality to enable the user to jump to a specific question?	Users are able to access risk assessment questions with specific outcome types from the 'update risk assessment' section as detailed above.	Confirmed
7.62	If a question is answered as a 'no', does the system allow the entry of a suggested mitigation by the user?	Questions are not split by 'yes' or 'no' answers but by 'high' or 'low' risk depending on the steps taken by the firm. If the question has a high risk outcome the user can detail appropriate risk mitigation steps in the comments box and upload appropriate documents in support. The user then seeks the approval of the MLRO for the mitigation steps suggested.	Confirmed
7.63	If so, is the MRLO alerted to this and do they have the option to accept/reject the suggested mitigation action?	Should a user wish to demonstrate risk mitigation steps, they must seek the approval of the MLRO to ensure the steps are effective.	Confirmed. The MRLO has to acceept (or reject).

Ref	Requirement	Vendor Response	Reviewer Comments
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?	Yes if the MLRO accepts all high outcome risk assessment questions as being effectively mitigated then the status of the firm will move from 'high risk' to 'risk mitigated'.	Confirmed
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?	AMLCC provides each firm with a PDF report of every update of the firm wide risk assessment by the firm. Each change is tracked within the risk assessment audit trail. Once completed the platform stores the latest version which is viewable on screen or as a PDF at any time.	Confirmed
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	AMLCC users are able to set up and maintain the general details of a client including all things mentioned in the question. However, there is not a flag denoting whether the company is active or not as once the firm is disengaged by the client the client status is moved to 'archived'.	Confirmed
7.67	Can client/company information be imported using a standard spreadsheet template? If so, how is this validated?	Users can import clients in bulk using the upload system with a .CSV file which will automatically check that all fields are valid and instructions have been followed.	Noted
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 any PDF document can be uploaded against a client's details or a client's risk assessment.	Confirmed
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?	The AMLCC Document Management section allows users to upload relevant documents and set expiry dates should the user wish to be prompted of an expiring document. Documents can be deleted following GDPR regulations.	Confirmed. Can archive a document. Can add an expiry date and a reminder date to a document.
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 any client can be moved to 'archived' status and no further changes can be made. If that client re engage the user firm the client records can be 'unarchived'.	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 there are different client risk assessments for every client type - eg personal, sole trader, corporate, trust, etc.	Confirmed
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?	The type of client risk assessment is selected by the AMLCC user.	Confirmed
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	Each client risk assessment allows users to select services offered / provided to that client.	Confirmed
7.74	Are some questions in the Risk Assessment mandatory and others optional depending on the services selected by the firm?	No the risks are not restricted by service so all questions are mandatory.	Noted
7.75	Does the system show progress through the Risk Assessment: which sections have been started and which completed?	Yes as the user progresses through the client risk assessment the status of each section will move from 'not started' to 'in progress' to 'completed' with colour changes to the headers to accompany this.	Confirmed
7.76	Does the system allow subsequent amendment of individual entries, without the need to walkthrough complete sections of questions again?	Yes users can access individual questions and make changes as they wish which will be logged as part of the audit trail.	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?	Yes each question has a 'high' or 'low' risk outcome initially. Any high risk outcome may be 'risk mitigated' by the firm's MLRO with notes added to explain how that has been achieved. Mitigation steps are added to the question where appropriate.	Confirmed. As 7.52

Ref	Requirement	Vendor Response	Reviewer Comments
7.78	Do all the questions have additional guidance and useful links should further clarification be required by the user?	Guidance and mitigation steps have been added where considered useful.	Confirmed
7.79	Is a comments box available under each question, to provide the facility to capture additional information relevant to the Firm Risk Assessment?	Yes a comments box is available to be completed if wished for each question. Users can also add any relevant supporting documents to each question.	Confirmed
7.80	Are suggested risk mitigation steps included against each question?	Guidance and mitigation steps have been added where considered useful.	Confirmed
7.81	Are high risk areas clearly highlighted?	Every question has a potential high risk outcome.	Confirmed
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?	A summary of the question outcomes is provided on the client risk assessment home page. Once a user accesses the update client risk assessment section those same question outcomes are displayed and can be clicked through to see each question level per section.	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?	Yes as the user progresses through the firm wide risk assessment the status of each section will move from 'not started' to 'in progress' to 'completed' with colour changes to the headers to accompany this.	Confirmed
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?	No every question must be completed.	Confirmed
7.85	Can a completed section be manually marked as not completed?	No this is not possible.	Confirmed
7.86	Does the system have search functionality to enable the user to jump to a specific question in the information collection process?	Users are able to access risk assessment questions with specific outcome types from the 'update risk assessment' section as detailed above.	Confirmed
7.87	If a question is answered as a 'no', does the system allow the entry of a suggested mitigation by the user?	Questions are not split by 'yes' or 'no' answers but by 'high' or 'low' risk depending on the steps taken by the firm. If the question has a high risk outcome the user can detail appropriate risk mitigation steps in the comments box and upload appropriate documents in support. The user then seeks the approval of the MLRO for the mitigation steps suggested.	Confirmed
7.88	If so, is the MRLO alerted to this and do they have the option to accept/reject the suggested action?	Should a user wish to demonstrate risk mitigation steps, they must seek the approval of the MLRO to ensure the steps are effective.	Confirmed
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.	After the initial risk assessment is completed, the user is presented with a set of questions that would require enhanced due diligence to be undertaken on that client. The platform will then assess all the answers given to determine if EDD is required. If EDD is required, users are directed to the 'EDD measures to apply' section that will guide the user through the additional EDD steps required.	Confirmed. Last section of the Risk Assessment sets whether EDD is required. Some subsequent questions may be greyed out as the questions have already been answered in earlier sections.
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?	Yes if the MLRO accepts all high outcome risk assessment questions as being effectively mitigated then the status of the firm will move from 'high risk' to 'risk mitigated'.	Confirmed
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 location/jurisdiction - Identified as a Politically Exposed Person (PEP) - Where there is a high risk of ML or terrorist activity.	Yes, after the initial risk assessment is completed, the user is presented with a set of questions that would require enhanced due diligence to be undertaken on that client. The platform will then assess all the answers given to determine if EDD is required. If EDD is required, users are directed to the 'EDD measures to apply' section that will guide the user through the additional EDD steps required.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
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?	AMLCC provides each firm with a PDF report of every update of the firm wide risk assessment by the firm. Each change is tracked within the risk assessment audit trail. Once completed the platform stores the latest version which is viewable on screen or as a PDF at any time. A summary of the question outcomes is provided on the client risk assessment home page. Once a user accesses the update client risk assessment section those same question outcomes are displayed and can be clicked through to see each question level per section.	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?	No. Risk assessment questions are not changeable.	Confirmed
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)?	Not aplicable.	-
7.95	Does the system provide the option for an authorised user in the Firm to manually amend a Client Risk Assessment template?	Only the answers to questions can be amended not a risk assessment 'template' itself.	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?	A reusable client profile can be saved by the user and used as they wish for clients with the same risk profile. It is up to the user which clients they use the same saved template for.	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?	Yes AMLCC has optional reusable client profiles which can be purchased at additional cost. These are designed as a time saving process for a user who has a number of clients with the same risk profile - for example local florists or local taxi drivers. They are a set of answers to the standard risk profile which the user can reuse across a number of appropriate clients.	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?	A reusable client profile can be saved by the user and used as they wish for clients with the same risk profile. It is up to the user which clients they use the same saved template for.	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?	The client identity checking process is completely controlled by the user. Checks need to be purchased at additional cost and then used within 3 years after purchase. The user triggers the check from within AMLCC and is the only person that can do so.	Confirmed. Pre-purchase credits. Results saved to client details.
7.100	Does the system provide integrated identity checking functionality?	Yes AMLCC provides users access to two different identity checking services.	Confirmed
7.101	If so: - What third-party providers are used? - Is a separate/additional subscription required?	AMLCC provides access to a client identity validation service (including checking various databases such as the electoral roll, sanctions list, PEPs, CIFS fraud database) Equifax and a biometric ID verification service via Hooyu. These services are entirely optional and at an additional cost to the standard annual subscription.	Noted
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 the result of the check with any data provided by the third party provider is saved in the client section of AMLCC.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.103	Does the system provide integrated biometric ID verification functionality?	Yes a user can choose to purchase the option to run biometric ID verification checks using Hoooyu.	Confirmed. BIOmetric has to go via the individual being checked.
7.104	If so: - What third-party ID providers are used? - Is a separate/additional subscription required?	A biometric ID verification service via Hooyu is available to all users. This service is entirely optional and at an additional cost to the standard annual subscription.	Confirmed
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 the result of the check with any data provided by the third party provider is saved in the client section of AMLCC.	Confirmed
7.106	Is there a time-window within which these checks must be undertaken once the process has been started?	A biometric ID verification check must be carried out by the user's client within 7 days of the user activating the process within AMLCC.	Noted
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.	Included in the platform is access to Companies House through the client dashboard for corporate client information. Users are able to purchase company credit reports via CreditSafe. It is to be noted that users must independently verify beneficial ownership information with the clients directly and should not rely upon 3rd party sources unless a reliance agreement between professionals is specifically in place.	Noted
7.108	Does the system provide an integrated link to Companies House in order to verify company details?	Yes there is an integrated link to Companies House from the client dashboard.	Confirmed
7.109	If so: - Is the link direct to Companies House or via a third-party provider? - Is a separate/additional subscription required?	The Companies House link is direct and is part of the standard annual subscription.	Noted
7.110	Does the system provide any third-party links for checking overseas companies? If so, please provide details	No you cannot check an overseas company from within AMLCC.	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?	The Companies House link is a direct link to confirm data so the result is seen on screen within AMLCC on demand.	Noted
7.112	Does the system provide an integrated link to third-party companies providing credit-checking functionality?	Yes AMLCC has a link to the Creditsafe Company credit check system.	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?	These reports are available at additional cost as required by the user. The result is automatically saved and stored in the client details section of AMLCC.	Noted
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?	In the 'firm support' section of AMLCC there are a number of template documents that can be used by an accountancy firm including a template engagement letter. These are not emails but template documents to be saved and used as required.	Confirmed
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?	No as these are not emails but template documents to be used as required.	Noted
7.116	*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?	Included in the platform is access to Companies House through the client dashboard for corporate client information. Users are able to purchase company credit reports via CreditSafe. It is to be noted that users must independently verify beneficial ownership information with the clients directly and should not rely upon 3rd party sources unless a reliance agreement between professionals is specifically in place.	Confirmed
7.118	If so, does this cover: - Individuals? - Companies? - Trusts? - Pension Funds? - Sole Trader? - Other entities, please specify?	Please see answer above particularly with reference to the need to identify and verify the beneficial owners of all entity clients independently.	Confirmed. (For individuals this will be an Equifax check).

Ref	Requirement	Vendor Response	Reviewer Comments
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 such database exists in AMLCC.	Noted
7.120	Is the user able to drill down/across into the entity structure and view the details at each level?	Not applicable.	-
7.121	*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?	AMLCC has a detailed internal Suspicious Activity Report ('SAR') reporting tool. If a staff user is concerned about the activities of a client they can report the client to their MLRO. The answers they complete are based upon the information the MLRO will need to give the National Crime Agency if the MLRO decides to progress the matter further. The MLRO is emailed to inform them a SAR report has been made. It would not be appropriate to block the client activity on AMLCC as a SAR report is a highly confidential process and should not be flagged to any other employee."Tipping off' is a serious crime.	Confirmed. "Red button" option (SAR report).
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?	There is a client and firm dashboard in AMLCC. These dashboards give the user full information on both the information pertinent to the firm and its clients. Examples include how many clients, how many of each client type, how many high / low risk clients, any risk mitigation actions pending and a lot of other information. Information such as documents stored relevant to a client can be found once a section is selected such as 'high risk clients'. All high risk clients are then listed and you can access any documents stored or the relevant risk assessment etc.	Confirmed
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?	A user can navigate directly from the dashboard into the most recent client risk assessment. Other information is obtained from the client details and document management sections.	Confirmed
7.125	Is the Accountant able to share the dashboard with the Client? If so, explain how this operates.	No access to AMLCC is purely for the accountant.	-
Reports			
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.	AMLCC has two key purposes. Firstly to enable a regulated firm to manage and evidence its AML responsibilities. Secondly, AMLCC provides reports that can be downloaded to provide evidence of those steps to the firm's AML supervisor. The reports are PDF reports that are extracts from the platform in key area such a firm wide and client risk assessments, AML policy and training certificates.	Confirmed
7.127	Does the system allow drill through from a report into the underlying Assessment section/question?	No as reports are generated as PDFs and as such do not have live links back to the platform for security purposes.	Confirmed
7.128	Are all reports adequately titled and dated? e.g. report name, Client name, pages, numbers etc.	All reports are titled and dated and include all the information suggested.	Confirmed
7.129	Do the reports provide totals where applicable?	Not applicable.	-
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 all AMLCC generated reports are PDFs.	Confirmed

Ref	Requirement	Vendor Response	Reviewer Comments
7.131	If so, does the system allow graphics and/or Participant logos to be incorporated in the page formatting?	Not applicable.	-
7.132	Can all reports be print previewed?	The report can be generated and received as a PDF before choosing to print it.	Confirmed
7.133	Does the reporting functionality have the facility to scroll up and down when output to screen?	Yes the user can view as required.	Confirmed. As a PDF onscreen.
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.	Not applicable as all reports in PDF format.	Confirmed
7.135	Explain how a report [or parts of a report] can be published/provided to the Participant.	Reports are available as a PDF to be used as required.	Confirmed