



**NIGERIAN FINANCIAL INTELLIGENCE UNIT**

# **GUIDELINES**

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## **POLICY GUIDELINES FOR IMPLEMENTING THE AML/CFT/CPF DATA MANAGEMENT FRAMEWORK BY COMPETENT AUTHORITIES IN NIGERIA**

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Pursuant to sections 3(1)(k), 3(p) and 4(5) of the Nigerian Financial Intelligence Unit Act 2018, the Nigerian Financial Intelligence Unit (NFIU), in fulfilment of its obligations publishes this guideline for the establishment of a data management framework to maintain comprehensive statistics on matters relevant to money laundering, terrorist financing and other predicate offences

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## **INTRODUCTION**

Money laundering and terrorism financing pose a significant threat to global economies and security. In response, many countries have established Anti-Money Laundering/Counter-Terrorism Financing and Proliferation (AML/CFT/CPF) laws, regulations, and policies to prevent and detect such activities. An essential element of an effective AML/CFT/CPF framework is the collection, maintenance, and reporting of statistics related to AML/CFT/CPF activities.

In line with one of the functions of the Nigerian Financial Intelligence Unit (NFIU) as provided for in section 3(1)(p) of the NFIU Act 2018 which empowers the Unit to maintain comprehensive statistics on matters relevant to the effectiveness and efficiency of money laundering, financing of terrorism and proliferation of weapons of mass destruction and associated predicate offences, including statistics of suspicious transactions received and disseminated, money laundering and terrorist financing investigations, prosecutions and convictions, property frozen, seized and confiscated, mutual legal assistance or other international requests for cooperation; the NFIU in collaboration with AML/CFT/CPF Authorized Officers developed an online Data Management Framework for the implementation of this requirement as well as fulfil the provisions of Recommendations 2 and 33 of the Financial Action Task Force (FATF) Standards. It is worth noting that Section 26 of the Money Laundering (Prevention & Prohibition Act) 2022 requires the Honourable Attorney General of the Federation to provide the President with periodic reports that include relevant statistics from all competent authorities, which can only be derived from the AML/CFT/CPF Data Management Framework.

This policy document provides guidelines for competent authorities to collect and report accurate and meaningful AML/CFT/CPF statistics in line with FATF Recommendation 33. The guidelines cover the key steps and considerations for establishing clear procedures for collecting and managing data, implementing appropriate technology, ensuring data accuracy and consistency, and reporting on statistics on a regular basis. By following these guidelines, the competent authority

can use AML/CFT/CPF statistics to monitor performance and drive continuous improvement in their operations.

## **POLICY GUIDELINES**

**Objectives:** The primary objectives of the policy are to:

- a. Ensure that accurate, reliable, and timely statistics related to AML/CFT/CPF activities are collected and maintained by AML/CFT/CPF competent authorities.
- b. Establish a central online data management framework for the collection and reporting of statistics related to AML/CFT/CPF activities.
- c. Facilitate the sharing of information between AML/CFT/CPF authorities to support effective AML/CFT/CPF activities.

## **SCOPE**

This policy applies to all AML/CFT/CPF competent authorities and involves the collection, maintenance, and reporting of statistics related to their respective AML/CFT/CPF activities.

## **DEFINITIONS**

- a. AML/CFT/CPF Competent Authorities: Any agency or institution concerned with combating money laundering and terrorist financing under this Act or under any other law or regulation.
- b. Central Online Data Management Framework: A centralized system maintained by the NFIU that collects, stores, and manages data related to AML/CFT/CPF activities.
- c. Focal Officer: The individual designated by each AML/CFT/CPF authority responsible for the collection, maintenance, and reporting of statistics related to AML/CFT/CPF activities.
- d. Relevant Statistics: The statistics of AML/CFT/CPF related activities carried out by the competent authority based on their mandate.

## **PROCEDURE**

### **Identification and Granting Access to Focal Officers**

- a. The NFIU from time to time will identify AML/CFT/CPF competent authorities not provisioned on the AML/CFT/CPF Data Management Framework.
- b. Once the relevant agency has been identified, the NFIU will notify the agency on the relevant statistics they may be required to provide. The specific data requirement will be developed alongside the competent authority in line with statistics requirements for demonstrating an effective AML/CFT/CPF system.
- c. The NFIU will request for details of two (2) focal officers from the identified agency for provisioning on the data management framework. Such details will include, name, email address, mobile number and designation.
- d. The NFIU will after receiving the details of the focal officers, create their profiles and grant them access to the online data management framework.
- e. The NFIU will provide training and support to the focal officers to ensure they understand how to use the online data management framework effectively.

### **Data Collection**

- a. Focal officers must collect statistics related to AML/CFT/CPF activities in accordance with established guidelines and procedures.
- b. The statistics must be accurate, reliable, and up-to-date. Investigating and prosecutorial authorities should have internal mechanisms for tracking cases as they progress from investigation, prosecution, conviction and recovery of assets.
- c. The data must be collected in a standardized format to facilitate reporting and sharing of information.

### **Data Maintenance**

- a. Focal officers must maintain the collected data in a secure and confidential manner and ensure compatibility of AML/CFT/CPF requirements with Data Protection and Privacy rules and other similar provisions (e.g. data security/localisation).
- b. The data must be regularly updated to ensure accuracy and completeness with prior notification made to the NFIU should such a need arises. To ensure the statistics are accurate and consistent, establish clear processes for quality control, validation and data entry.
- c. Focal officers should regularly review the data for errors or anomalies and make corrections as necessary before uploading to the AML/CFT/CPF data management framework.
- d. To ensure the integrity of statistics provided on the AML/CFT/CPF Data Management Framework, only authorized users with unique login credentials and passwords are allowed to access the online data management framework. Users are prohibited from sharing their login credentials with anyone, including coworkers, family members, or friends.

### **Reporting**

- a. Focal officers must report the collected data to the central online data management framework according to established reporting procedures.<sup>1</sup>
- b. The reporting must be timely, accurate, and complete.
- c. The data must be reported in a standardized format to facilitate analysis and sharing of information.
- d. Reports should be submitted on a monthly basis, and any issues or concerns identified in the statistics should be addressed promptly.

### **Policy on Violation**

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<sup>1</sup> Manual for Accessing the Data Management Framework is Provided as an Appendix

- a. Any user found to have breached this policy will be subject to disciplinary action by their respective organization in line with their policy on unauthorized access to information.
- b. The NFIU will monitor the AML/CFT/CPF Data Management Framework to detect any modification, or deletion of data carried out without prior notification made to the NFIU. Any suspicious activity will be reported to the Chief Executive of the agency in concern for further investigation.

## **MONITORING AND EVALUATION**

- a. AML/CFT competent authorities must establish a monitoring and evaluation system to ensure the effectiveness of the policy.
- b. The monitoring and evaluation system must be based on established performance indicators such as the number and nature of STRs received and the success rate of investigations and prosecutions resulting from STRs etc.
- c. Analyze AML/CFT/CPF statistics on a regular basis to identify trends or patterns that could indicate a specific typology or modus operandi of money laundering or terrorist financing activities for the development of strategic products by the NFIU.
- d. The results of the monitoring and evaluation system must be used to improve the effectiveness of AML/CFT/CPF activities (eg. the success rate of regulatory actions such as fines and penalties, the success rate or enforcement actions such as sentences and confiscation measures etc).
- e. Provide regular updates to senior management of the competent authority to keep them informed of AML/CFT/CPF activities.

## **CONCLUSION**

This policy document provides guidelines for AML/CFT/CPF authorities to collect, maintain, and provide statistics to the central online data management framework in compliance with legal and FATF requirements by ensuring data accuracy and

consistency and performance monitoring. The policy document serves as a manual for focal officers in each of the agencies involved in AML/CFT/CPF activities. The effective implementation of this policy will enhance the effectiveness of AML/CFT/CPF activities, mutual evaluations, risk assessments and support the fight against money laundering and terrorism financing.

## APPENDIX

### REPORTING PROCEDURE ON THE AML/CFT/CPF DATA MANAGEMENT PORTAL

#### AML/CFT/CPF DATA MANAGEMENT PORTAL

Visit: <https://apps.nfiu.gov.ng/dataportal>

#### 1. RESET PASSWORD

##### Login

Organisation

Email Address

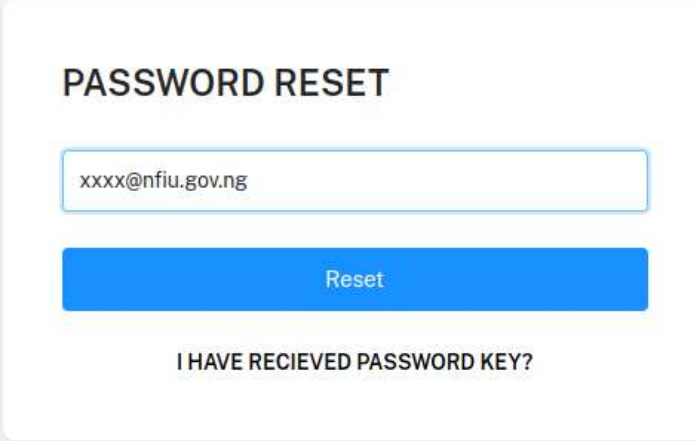
Password

Login

Login With Token

Forgot Password?

- Click on **Forgot Password?** And you shall see the **Password Reset Page**

A screenshot of a web form titled "PASSWORD RESET". It features a text input field containing the email address "xxxx@nfiu.gov.ng". Below the input field is a blue button labeled "Reset". At the bottom of the form is a link that reads "I HAVE RECIEVED PASSWORD KEY?".

**PASSWORD RESET**

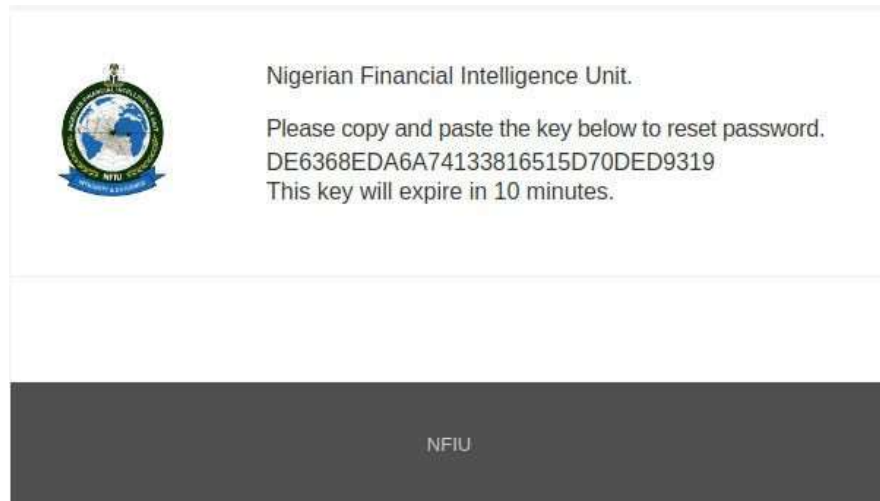
xxxx@nfiu.gov.ng

Reset

[I HAVE RECIEVED PASSWORD KEY?](#)

- Type in your email address (the one with which you received this manual)
- Password reset token which expires in 10 minutes will be sent to your email. Please copy the token. The email looks like this:





- Once you receive the token, click **I Have Recieved Password Key** on the **Password Reset** Page
- This will bring you to the **Reset Password** Page where you should paste the token in the **Reset Token** box, and type your chosen password in the two boxes provided for passwords. The password must contain at least one uppercase letter, lowercase letter and number and one of `_ $#!*%@"`

## Reset Password

Reset Token

DE6368EDA6A74133816515D70DED9319

Password

..... 

Enter Password Again

.....

Reset

- This will take you to the Login Page

## 2. LOGIN PAGE

### Login

Organisation

Nigerian Financial Intelligence Unit

Email Address

xxxxx@nfiu.gov.ng

Password

.....

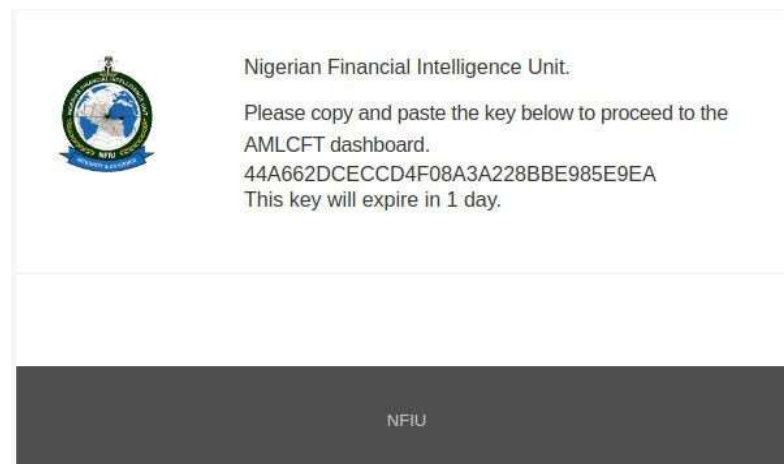
Login

Login With Token

[Forgot Password?](#)

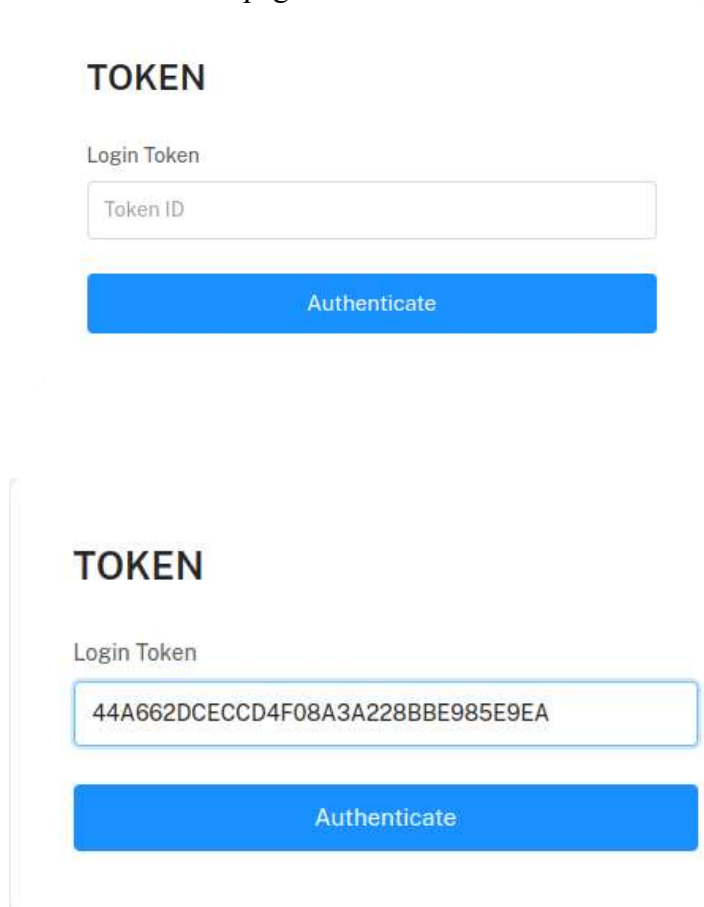
Requirements:

- **Organisation:** Select your own organisation from the dropdown list. For example, Nigerian Financial Intelligence Unit
- **Email Address:** Input your email address (the email through which this manual was sent to you). For example [jdoe@nfiu.gov.ng](mailto:jdoe@nfiu.gov.ng) or [jdoe@gmail.com](mailto:jdoe@gmail.com)
- **Password:** Input the default password sent to your email with this manual
- **Receive a Token:** A token will be sent to the users email address. The token email looks like this:



## NFIU

**Input the Token:** Kindly copy the token and paste it at the Token ID box. The token expires after 24 hours. The token page should look like this:



**TOKEN**

Login Token

Token ID

Authenticate

**TOKEN**

Login Token


44A662DCECCD4F08A3A228BBE985E9EA

Authenticate

- After a successful authentication the system will take the user to their organisational dashboard.

### 3. DASHBOARD

- The dashboard contains a list of forms that your organisation has submitted and a button for adding more forms (**Add Form** button) as shown below:



Name	Organisations	Created	Modified	Submissions
<a href="#">NAPTIP Case Statistics</a>	• National Agency for the Prohibition of Trafficking in Persons	Tue, Oct 18, 2022 9:50 AM	Tue, Oct 18, 2022 9:53 AM	<a href="#">Submissions</a>

- To send a form to the NFIU, click on **Add Form**

- This brings you to the a form for your own organisation. In this example, we used ONSA’s form as shown below:

- The input boxes with \* must be completed
- You must also select a report date at the end of the form
- You can optionally send a notification to the NFIU when you submit by selecting the “Send a notification to NFIU” box.
- Click on “Submit”
- After submission, the form will appear on the list of submitted forms on the dashboard

## 4. LOGOUT

- Click on your name at the top right hand corner of the dashboard or form pages, and you shall see the logout button as shown below

