

 Checklist

Checklist for Identification of Sanction Screening Gaps to Ensure Robust AML/CFT, TFS Compliance

Website: www.amluae.com

Email: info@amluae.com

Introduction

Sanctions Screening gaps rarely announce themselves before leading to failure. They hide behind list latency, poor data quality, faulty matching logic, and unclear escalation pathways. In UAE, Cabinet Decision No. 74 of 2020 is responsible for TFS, i.e., Sanctions Lists implementation. In order to ensure compliance with the same, a practical response for Regulated Entities is regular and disciplined gap analysis of Screening Methodology and Sanctions Screening Software, backed by repeatable tests, change-control, and evidence.

Also known as:

Sanctions Compliance Failures, Screening Control Gaps, Name Screening Negligence

Used for:

Ensuring no engagement or business relationship with the Designated Sanctioned Individuals or Entities and compliance with AML/CFT and TFS obligations.

Abuse in ML/TF/PF:

Facilitates the evasion of sanctions by designated individuals or organisations, enabling Money Laundering, Terrorist Financing, and Proliferation Financing through undetected channels.

Applicability

Financial Institutions (FIs):

- 🔴 Banks
- 🔴 Money Service Businesses (MSBs)
- 🔴 Insurance Companies
- 🔴 Securities Firms
- 🔴 FinTechs

Designated Non-Financial Businesses and Professions (DNFBPs):

- 🔴 Lawyers, Notaries, Other Legal Professionals
- 🔴 Accountants and Auditors
- 🔴 Real Estate Agents and Brokers
- 🔴 Dealers in Precious Metals/Stones
- 🔴 Trust and Company Service Providers

Virtual Assets Service Providers (VASPs)

How to Use This Checklist

- 🔴 Use during audits of Sanctions Compliance programs such as TFS obligations and control framework assessments
- 🔴 Front-line team: Screening Analyst should check for name match alerts, override logs, and false negative and positive trends
- 🔴 Compliance officers: Ensure governance over escalation, review of case handling, sanction list updates, and alert suppression logic
- 🔴 IT teams: Verify screening logic, fuzziness settings, and automated flagging performance.

Assess Sanction Screening Efficacy: Checklist for Strengthened AML/CFT, TFS Compliance (Yes/No Style)

A. System Configuration & Coverage

	Yes	No
Is the Sanction Screening System updated with evolving UAE Local Terrorist List, UNSC Consolidated List and TFS Sanctions List?		
Is the Sanctions Screening system up to date with the latest Unilateral/Multilateral lists from OFAC, UN, EU, and other National Regulators?		
Does the system screen all relevant parties (Customers, UBOs, Beneficiaries, Controlling Persons, Counterparties, etc.)?		
Are internal blacklists and watchlists also integrated and screened?		
Is real-time screening implemented for both onboarding and transactions?		

B. Data Quality and Input Standards

	Yes	No
Are names, aliases, dates, nationalities, and identifiers captured in a standard format, validated at entry, and enriched where needed		
Are parsing and normalisation applied before screening, and are data truncation or encoding issues prevented and monitored		
Is there a daily sample check for data quality, with defects fixed at source and logged?		

C. Matching Logic & Alert Calibration

	Yes	No
Is the matching engine configured for appropriate fuzziness, transliteration, and tokenization?		
Are screening alert thresholds and scoring logic risk-based and tested?		
Are low-quality matches and false positives regularly analyzed and is the screening tool accordingly recalibrated?		

D. Case Handling and Escalation

	Yes	No
Are all alerts worked with investigation notes, a clear disposition, and links to evidence		
Are overrides and suppressions documented, justified, independently reviewed, and periodically retested		
Are potential and confirmed name match pathways to goAML clear, timed, evidenced, and linked to freeze or suspend steps where required ?		

E. List Management & Governance

	Yes	No
Is there a process for manual updates of internal and third-party lists?		
Are list updates reviewed for completeness and accuracy?		
Is there version control and change log for list update history?		

F. Testing & Quality Assurance

	Yes	No
Does the tool provide a sandbox that mirrors production data shape for safe testing		
Do you run control name tests, near match tests, and negative tests after each material change, and archive the results		
Do you maintain a small, fixed seed pack of names, variants, and negatives to measure precision and recall across releases		
Are regression tests run on a schedule, with acceptance criteria defined and met before release		

G. Training and Oversight

	Yes	No
Are sanctions screening personnel trained on current typologies, evasion techniques of sanctioned individuals and evolving regulatory norms?		
Are override and escalation guidelines clearly documented and disseminated?		
Is senior management informed of recurring or critical lapses in screening?		

H. Tool Capabilities and Explainability

	Yes	No
Can the engine explain why a match triggered, including token level contributions and a readable score		
Can you inject a seed list for testing, export evidence with one click, and lock configurations with access control and approvals		
Does the tool support multi-script transliteration libraries, and configurable language handling		

I. Performance and Operations

	Yes	No
Are throughput and latency measured for onboarding and payment flows, with targets defined and met		
Are failures, timeouts, and queue backlogs monitored, alerted, and investigated		
Are rescreens on material change completed within the defined service level, and evidenced		

J. Change Management and Release Control

	Yes	No
Do you assess regulatory updates from EOCN and the UNSC, record impact, and map changes to configuration items		
Do you follow a verify and validate loop in sandbox before production, then deploy with a release note and a rollback plan		
Are user communications and training refreshers part of every release, and evidenced		

K. Evidence and Auditability

	Yes	No
Is there a central evidence pack for each period that includes list updates, threshold registers, test results, and sample cases		
Are approvals, exceptions, and compensating controls stored with dates, owners, and links		
Can you produce a one-page summary for auditors and supervisors that shows findings, fixes, and status		

Screening Health Check

We review lists, matching logic, and evidence, then give you fixes you can use now.

[Book Health Check](#)

How a RACI Matrix Enables Task Delegation and Role Clarity

What is RACI?

RACI denotes a responsibility framework that defines who is Responsible, Accountable, Consulted and Informed for the organisational operations. It ensures clear accountability, avoids duplication of efforts, reduces risk of oversight, and enables efficient coordination during escalations, audits, and remediation planning.

Purpose of this RACI:

Identifying and fixing Screening Method and Sanctions Screening Software gaps. The scope includes list coverage and updates, input data standards, matching logic and thresholds, alert governance for overrides or suppressions, control testing, and PNMR or CNMR pathways to goAML reporting. This aligns with UAE TFS guidance and DNFBP governance expectations: Senior Management sets risk appetite and oversight; the AML Compliance Officer is independent and runs the programme; and staff are trained and monitored.

- 🔹 **Frontline or sales staff:** capture clean customer inputs; follow potential or confirmed match hold steps; avoid off-system workarounds
- 🔹 **KYC Analyst:** enrich and normalise names, aliases, dates, and nationalities; verify data shape before screening
- 🔹 **Screening Analyst:** maintain list scope and update logs; tune fuzziness, transliteration, and token rules; analyse false positives; run control tests

- ⬢ **IT team:** own platform availability, Sanctions API and other software related integrations, data pipelines, sandbox and seed testing, performance and latency monitoring, configuration version control, release and access control
- ⬢ **AML Compliance Officer:** accountable for methodology, thresholds, override governance, PNMR or CNMR reporting, user training, and evidence
- ⬢ **Senior Management:** approves policy and risk appetite; receives metrics on gaps and fixes; ensures independent testing and resourcing.

RACI helps businesses streamline screening workflow by:

- ⬢ Clarifying ownership of sanctions screening process components (e.g., IT configuration vs compliance review)
- ⬢ Ensuring accountability for escalations, overrides, and suppressed alerts
- ⬢ Defining consultation workflows between compliance, operations, and IT
- ⬢ Improving transparency in case handling and governance reporting.

Make Roles Crystal Clear

We run a short working session to assign owners, service levels, and escalations.

[Book RACI Session Now](#)

RACI for Sanctions Screening Gap Identification

Screening gap question (method or software)	Frontline or sales staff	KYC Analyst	Screening Analyst	IT Team	AML Compliance Officer	Senior Management
Are all required lists in scope and current, with an update log and evidence?	C	C	R	C	A	I
Do input standards cover names, aliases, dates, and nationalities, with enrichment and normalisation?	R	R	C	C	A	I
Is data ingestion reliable, with parsing and normalisation applied before screening, and defects fixed at source?	I	C	C	R	A	I
Is matching logic fit for purpose, including fuzziness, transliteration, token handling, and risk based thresholds?	I	C	R	R	A	I
Are false positives analysed for patterns, with documented threshold recalibration and approvals?	I	C	R	C	A	I
Are PNMR and CNMR pathways to goAML clear, timely, evidenced, and linked to freeze or suspend steps?	C	C	R	C	A	I

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Screening gap question (method or software)	Frontline or sales staff	KYC Analyst	Screening Analyst	IT Team	AML Compliance Officer	Senior Management
Are overrides and suppressions justified, logged, independently reviewed, and periodically re-tested?	I	C	R	C	A	I
Is a sandbox available that mirrors production, with seed list injection and regression tests after changes?	I	I	R	R	A	I
Are throughput, latency, failures, and queues monitored with alerts and investigation steps?	I	I	C	R	A	I
Is role based training completed for all users, with refreshers after list or system changes?	R	R	R	C	A	I

Test and Validate Your Tool

Run Sanctions Screening tool tests, tune thresholds, and package audit proof.

Schedule Testing

Action Items for Regulated Entities to Mitigate Sanction Screening Gaps

In-House Compliance Department Setup

- 🔹 Conduct an end-to-end screening gap assessment
- 🔹 Appointing a sanctions officer to manage screening governance
- 🔹 Document override and escalation SOPs

Role-Specific AML Training

- 🔹 Provide role-based training on sanctions evasion patterns
- 🔹 Run tabletop exercises involving alert escalation scenarios
- 🔹 Refresh training post system upgrades or list changes

Best Practices: Checklist + RACI-Driven Implementation

- 🔹 Use name fuzziness logic and token-level analysis
- 🔹 Regularly perform control name testing to validate detection coverage
- 🔹 Avoid alert suppression without independent review
- 🔹 Integrate sanctions list updates with change tracking and versioning
- 🔹 Perform Quality Assessment on missed hits or override-heavy teams
- 🔹 Engage IT and compliance jointly on matching logic refinement
- 🔹 Ensure senior leadership is informed of repeated lapses and exposure
- 🔹 Align RACI design with actual escalation and case handling workflows

**TFS Compliance Comes with
Trials, But You Don't Have to
Confront Them Alone**

Fortify Your Sanction Screening Compliance Shield.

[Contact Now](#)

Glossary of Terms

S.No.	Terms	Meaning
1	AML	Anti Money Laundering. Measures to prevent laundering of criminal proceeds.
2	CFT	Countering the Financing of Terrorism. Measures to stop funding of terrorism.
3	TFS	Targeted Financial Sanctions. Freezing or restricting assets of designated persons.
4	Cabinet Decision 74 of 2020	UAE Law set for sanctions implementation, freeze without delay, and reporting.
5	EOCN	Executive Office for Control and Non Proliferation, the UAE authority for TFS lists and guidance.
6	UAE Local Terrorist List	The national list of designated persons and entities that must be screened.
7	UNSC Consolidated List	United Nations Security Council (UNSCRs) that must be screened in UAE.
8	FIU	Financial Intelligence Unit of the UAE. Receives reports through goAML.
9	goAML	The FIU portal used for sanctions name match reporting and other submissions.
10	PNMR	Potential Name Match Report filed in goAML for possible matches.
11	CNMR	Confirmed Name Match Report filed in goAML for confirmed matches.
12	Freeze without delay	Immediate freeze or suspension of funds when a match is found, as required by UAE rules.
13	Frontline or sales staff	Staff who collect customer information and start onboarding.
14	KYC Analyst	Know Your Customer analyst who validates and enriches identity data.
15	Screening Analyst	Specialist who manages lists, matching settings, alert triage, and case evidence.
16	AML Compliance Officer	Independent, senior role that owns the programme and reporting duties.
17	Senior Management	Sets risk appetite, approves policies, receives management information, and oversees compliance.
18	Customer	The person or entity being onboarded or transacting.

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S.No.	Terms	Meaning
19	UBO	Ultimate Beneficial Owner. The natural person who ultimately owns or controls an entity.
20	Beneficiary	The person who receives funds or benefits from a transaction or account.
21	Controlling person	Individual with significant control over a legal entity.
22	Counterparty	The other party to a transaction that must be screened.
23	Material change	Significant update that should trigger rescreening, for example a new name or nationality.
24	RACI	Role map that marks who is Responsible, Accountable, Consulted, and Informed.
25	Service level agreement	A target time or quality level, for example time to review a name match.
26	Role based access control	System access given to users based on their job role.
27	List governance log	Record of lists in scope, update dates, approvers, and evidence location.
28	Internal watchlist	Firm specific list of names that must be screened in addition to official lists.
29	Version control	Tracking configuration or list changes with who changed what, when, and why.
30	Change log	A dated record of changes made to lists or configurations.
31	Release note	Short summary of what changed in a software or rules release.
32	Rollback plan	Steps to safely return to the previous version if a change fails.
33	Data quality	Whether input data is complete, accurate, and in the correct format.
34	Parsing	Splitting a field into parts, for example first name and last name.
35	Normalisation	Making data consistent in format, for example dates and spacing.
36	Enrichment	Adding useful details before screening, for example aliases or alternate spellings.
37	Deduplication	Finding and removing duplicate records.
38	Transliteration	Converting characters from one script to another, for example Arabic to Latin.
39	Token	A piece of a name used for matching; for example, the name "JOHN A SMITH" is split into tokens "John," "A," and "Smith."
40	Fuzziness	Allowing near matches so small differences still trigger a hit.

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S.No.	Terms	Meaning
41	Threshold	The score level at which the system creates an alert.
42	Language pack	Rules that help the engine handle a specific language or script.
43	Matching engine	Software that compares inputs to lists and produces scores and alerts.
44	Explainability	The ability of the tool to show why a match triggered in clear terms.
45	False positive	An alert that is not a true match.
46	False negative	A missed alert that should have been a match.
47	Precision	Share of alerts that were correct. Higher is better.
48	Recall	Share of true matches that were caught. Higher is better.
49	Sandbox	Safe copy of the live system used for testing, not real customers or funds.
50	Seed list	Small set of names you know must be caught or ignored, used to test the tool.
51	Control name test	Test to confirm known listed names are always found.
52	Negative test	Test to confirm clean names do not trigger alerts.
53	Regression test	Re running the same tests after changes to confirm nothing broke.
54	Test suite	A repeatable collection of tests with expected results.
55	Acceptance criteria	Pass or fail conditions that must be met before release.
56	Throughput	How many screenings the system processes per minute.
57	Latency	How long one screening takes from start to finish.
58	Queue	Items waiting because the system is busy.
59	Timeout	A screening that did not complete within the allowed time.
60	Alerting and runbook	Automatic warnings for issues, plus a short guide on who does what.
61	Override	Decision to close or downgrade an alert under defined rules.
62	Suppression	Rule that stops certain alerts from appearing, used with approvals and review.
63	Evidence pack	Folder that holds list updates, change records, test results, and sample cases.
64	Audit trail	Complete record of actions, approvals, and timestamps.

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S.No.	Terms	Meaning
65	Real time screening	Screening that runs immediately during onboarding or payment.
66	Batch screening	Screening that runs in bulk at set times, for example overnight.
67	Rescreening	Screening again when data or lists change, or on a schedule.
68	Potential match	A match that needs more review before action.
69	Confirmed match	A match that meets criteria and triggers freeze or suspend steps and reporting.
70	Pattern analysis	Studying repeated reasons for alerts or misses to improve settings.
71	Suppressed pattern re test	Testing to confirm a suppression rule did not hide a true match.
72	Management information	Regular metrics for leadership, for example list currency and alert volumes.
73	Programme log	Single place that records gaps, fixes, approvals, and decisions by date and owner.

Train the Team, Raise the Bar

Role based training for frontline, KYC, and screening analysts, with short refreshers.

Arrange Training

About AML UAE

AML UAE is an Anti-Money Laundering (AML) consulting firm with decades of experience supporting businesses across the UAE.

We have expertise in providing various AML services to DNFBPs, such as Lawyers, Real Estate Agents, Accountants and Auditors, Dealers in Precious Metals and Stones, and Company Service Providers. We also provide AML consultancy services to Virtual Asset Service Providers.

We are equipped to help you register on the goAML portal. We conduct Enterprise-Wide Risk Assessments and align your AML/CFT policies and procedures in line with them. We design customized forms and templates for carrying out KYC, Customer Risk Assessment, and Enhanced Due Diligence for your customers. We help you prepare and submit reports like SAR, STR, CNMR, PNMR, HRC, HRCA, DPMSR, etc. We ensure that your employees are well-trained from an AML perspective.

Not just this, we assist regulated entities with decoding the Remedial Action Plan and effectively implementing the authority's recommendations around the AML program.

AML UAE is your go-to partner for handling all your compliance-related requirements.

Once we enter the picture, AML compliance is ensured. With that, you can continue to be a highly reputed business, actively striving to counter money laundering, terrorist financing, and proliferation financing.

Our Team



Pathik Shah

Founder

CAMS, FCA, CISA, CS, DISA (ICAI), FAFP (ICAI)

Pathik is a Chartered Accountant with proven experience in governance, risk, and compliance. He helps companies with end-to-end AML compliance services, from conducting Enterprise-Wide Risk Assessments to implementing robust AML compliance frameworks. He has played a pivotal role as a functional expert in developing and implementing RegTech solutions for streamlined compliance.



Jyoti Maheshwari

Partner

CAMS, ACA

Jyoti is a Chartered Accountant and Certified Anti-Money Laundering Specialist (CAMS), with extensive hands-on experience in regulatory compliance, legal advisory, policy-making, tax consultation, and technology project implementation. Jyoti holds experience with Anti-Money Laundering regulations prevalent across various countries. She helps companies with risk assessment, designing and deploying adequate mitigation measures, and implementing the best international practices to combat money laundering and other financial crimes.

Our Team



Dipali Vora

Partner

CAMS, ACS

Dipali is an Associate member of ICSI and a Certified Anti-Money Laundering Specialist (CAMS). She has a strong background in the compliance domain, including Anti-Money Laundering, due diligence, secretarial audit, and managing scrutiniser functions. She currently assists clients by advising and helping them navigate through all the legal and regulatory challenges of Anti-Money Laundering Law. She helps companies to develop, implement, and maintain effective AML/CFT and sanctions programs.



Purva Buch

Senior Consultant

CAMS, LLB

Purva is a Certified Anti-Money Laundering Specialist (CAMS) and a Lawyer. She has substantial knowledge of Anti-Money Laundering Laws, Rules, Regulations, and AML Compliance Processes. Purva has been instrumental in drafting RegTech processes, corporate policymaking, and fulfilling various legal research and drafting requirements arising from AML laws and regulatory technology.

Service Matrix

Service	Common Drivers							Value Proposition
	Ensure legal compliance	Save time and costs	Need expert support	Automate compliance processes	Implement best practices	Crisis management	Change AML/CFT consultant	
goAML Registration	✓		✓					Streamlines the process of registering with the UAE FIU goAML portal. Ensures compliance and reduces administrative burden.
Enterprise-Wide Risk Assessment	✓	✓	✓		✓		✓	Identifies risk factors, gross risk, controls deployed and their effectiveness, residual risk, and need for additional controls.
AML/CFT Policy Drafting	✓	✓	✓		✓		✓	Provides tailored AML/CFT policy frameworks that are up-to-date with current laws, enhancing regulatory compliance.
In-house Compliance Department Set-up	✓		✓		✓		✓	Establishes a robust internal compliance structure, helps recruit the right resources and ensures ongoing compliance efficiency.
KYC Managed Services	✓	✓	✓		✓	✓		Outsourced KYC processes that speed up customer onboarding and maintain high compliance standards.
Ongoing AML/CFT Consulting	✓	✓	✓	✓	✓	✓	✓	Continuous expert advice tailored to address specific challenges, enhancing overall compliance strategies.
AML/CFT Health Check	✓		✓		✓	✓	✓	Conducts comprehensive reviews and assessments to pinpoint vulnerabilities and recommend improvements.
AML Training	✓	✓	✓		✓		✓	Offers comprehensive training programs that enhance the compliance skills of employees at all levels.
AML Software Selection	✓	✓	✓	✓	✓			Helps choose the best AML software that fits the company's needs, improving efficiency and cost-effectiveness.
Screening Software Validation	✓		✓	✓	✓			Tests and validates screening tools to ensure they meet regulatory requirements and operational needs.
Regulatory Reporting	✓	✓	✓		✓		✓	Streamlines the process of creating and submitting SAR, STR, PNM, CNMR, DPMSR, REAR, HRC, and HRCA reports accurately and on time.

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AMLVerse

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