CBAR

XML Schema and Validation Rules

Contents

Version History

Version	Changes	Author	Date
1.0	Document Created	FIAU	21/05/2020
1.1	Updated Branding	FIAU	17/07/2020
1.2	Updated validation codes in the document to match system validation codes	FIAU	31/08/2020

Project Introduction and Scope

Recent amendments to the Prevention of Money Laundering Act of 7 February 2020, have widened the functions of the Financial Intelligence analysis Unit (FIAU) to also include the establishment, management and administration of a **Central Bank Account Registry (CBAR)**. The addition of this said function within the remit of the FIAU has been included as part of the transposition of the fifth Anti-Money Laundering Directive (AMLD5) into Maltese law.

The FIAU is in process of implementing a system to cover this new function, the **Central Bank Account Registry (CBAR) System** which is a registry system with the scope of gathering high level information of:

- IBAN accounts
- Safety Deposit Boxes
- Safe-Custody Services

The CBAR System shall also gather information in relation to Natural and non-natural persons who own, control or manage any of the abovementioned products.

The main purpose of the CBAR System is to have a central registry of accounts provided by credit and financial institutions that are identifiable by IBANs, and a registry of safe deposit boxes and safe custody services offered by credit institutions. This data shall be administered by the CBAR Team within the FIAU and the data stored on the CBAR system shall serve as a search engine by specified authorities for the purpose of carrying out analytical reviews or investigations. The system shall therefore serve the basis for such Authorities to gain more insight as to the Reporting Entities that have relationships with specific individuals, entities or legal arrangements.

Data gathering will cover around 50 institutions registered in Malta that are either credit or financial institutions hereby referred to as Reporting Entities (REs) and whom offer the abovementioned products.

The submission of data related to the abovementioned products shall only be carried out through the CBAR Portal. Reporting Entities shall be required to update the initial data uploaded on the portal with any changes that may have taken place, together with uploading new information related to new customers to whom the abovementioned products are being offered. Reporting Entities shall be required to submit data through the CBAR portal on 7 calendar day intervals.

Glossary of Terms

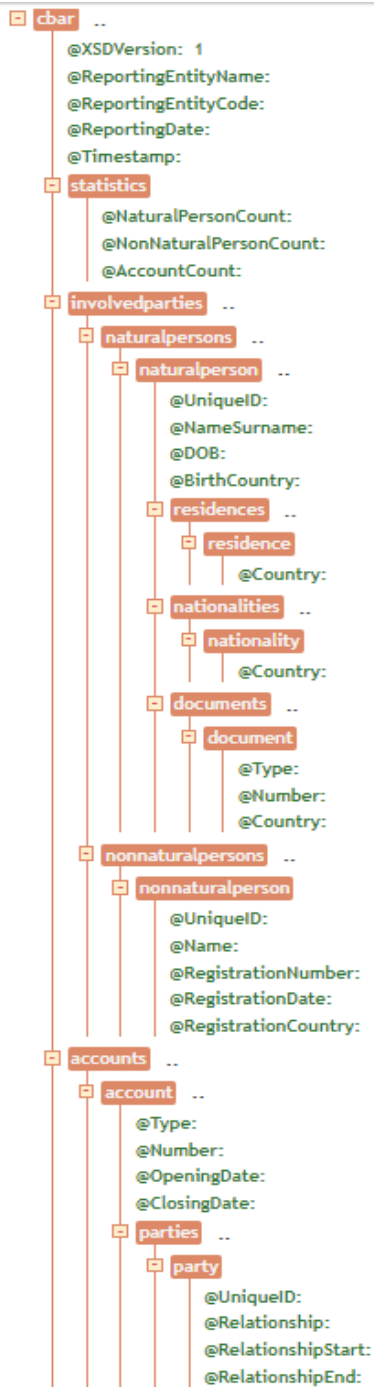|	
Natural Person	This is an individual human
Non-Natural Person	This is a legal person, which may be a private (i.e., business entity or non-governmental organization) or public (i.e., government) organization.
Reporting Entity	This is the institution which will be submitting the data
Involved Party	The person (natural or non-natural)

1. XML Schema Overview

XML Tree View

```
cbar  --
    @XSDVersion:  1
    @ReportingEntityName:
    @ReportingEntityCode:
    @ReportingDate:
    @Timestamp:
    statistics
        @NaturalPersonCount:
        @NonNaturalPersonCount:
        @AccountCount:
    involvedparties  --
        naturalpersons  --
            naturalperson  --
                @UniqueID:
                @NameSurname:
                @DOB:
                @BirthCountry:
                residences  --
                    residence
                        @Country:
                nationalities  --
                    nationality
                        @Country:
                documents  --
                    document
                        @Type:
                        @Number:
                        @Country:
        nonnaturalpersons  --
            nonnaturalperson
                @UniqueID:
                @Name:
                @RegistrationNumber:
                @RegistrationDate:
                @RegistrationCountry:
    accounts  --
        account  --
            @Type:
            @Number:
            @OpeningDate:
            @ClosingDate:
            parties  --
                party
                    @UniqueID:
                    @Relationship:
                    @RelationshipStart:
                    @RelationshipEnd:
```

XML File Structure

```xml
<?xml version="1.0" encoding ="UTF-8"?>
<CBAR XSDVersion="1" ReportingEntityName=" " ReportingEntityCode =" " ReportingDate=" "
Timestamp = " ">
    <Statistics NaturalPersonCount=" " NonNaturalPersonCount = " " AccountCount = " "/>
    <InvolvedParties>
        <NaturalPersons>
            <NaturalPerson UniqueID=" " NameSurname =" " DOB =" " BirthCountry=" ">
                <Residences>
                    <Residence Country=" "/>
                </Residences>
                <Nationalities>
                    <Nationality Country=" "/>
                </Nationalities>
                <Documents>
                    <Document Type=" " Number=" " Country=" "/>
                </Documents>
            </NaturalPerson>
        </NaturalPersons>
        <NonNaturalPersons>
            <NonNaturalPerson UniqueID=" " Name=" " RegistrationNumber=" " RegistrationDate="
" RegistrationCountry =" "/>
        </NonNaturalPersons>
    </InvolvedParties>
    <Accounts>
        <Account Type=" " Number=" " OpeningDate=" " ClosingDate=" ">
            <Parties>
                <Party UniqueID = " " Relationship = " " RelationshipStart =" "
RelationshipEnd=" "/>
            </Parties>
        </Account>
    </Accounts>
</CBAR>
```

Each field is discussed in the next section.

Some examples may be found in the appendix.

Schema Notes

- The following allow multiple elements:
  - Account
  - Party
  - NaturalPerson
  - NonNaturalPerson
  - Residence
  - Nationality
  - Parties
  - Document
- For each of the above, at least one should be provided

2. Data Requirements for XML File

REs are to report all customer (natural persons or non-natural i.e. entities and legal arrangements) accounts identifiable by IBAN. Specifically for credit institutions, in addition to accounts identifiable by IBANs, they are also expected to report all Safety Deposit Boxes or Custody Services offered to customers (as defined above). All data fields are mandatory unless otherwise specified.

The following data points based on the XML Schema provided above are required to be completed. A description of each data point is herewith also being provided.

If no value is required in an OPTIONAL marked field, this should be left BLANK. E.g. If a RelationshipEnd date is not applicable because the relationship is still ongoing, the XML attribute should be provided with a blank value (RelationshipEnd=""). This means that XML attributes should never be omitted completely.

Element: CBAR

Field Name	Field Type	Length	Description
XSDVersion	Numeric		The version of the schema being used. Leading zeros should not be included, for example "1" should be listed rather than "01" because "01" has a leading zero and this is not an allowed.
ReportingEntityName	alphanumeric	Min 1 Max 100	This is the name of the Reporting Entity. This should match the name registered on the CBAR system.
ReportingEntityCode	alphanumeric	Max 10	This is the registered company number of the Reporting Entity as registered with MBR. This should match the registered company number in the CBAR system. Only letters and numbers are allowed.
ReportingDate	YYYY-MM-DD		The reporting date of the data being provided in the document E.g. 2020-03-24
Timestamp	YYYY-MM-DDThh:mm:ss		The submission timestamp (this can be a different date to the reporting date). Time should be in 24-hour format, example: E.g. 2020-03-24T14:30:22

Element: Statistics

Field Name	Field Type	Length	Description
NaturalPersonCount	Numeric		The number of natural persons reported in the file
NonNaturalPersonCount	Numeric		The number of non-natural persons reported in the file
AccountCount	Numeric		The number of accounts reported by the reporting entity

Element: InvolvedParties>NaturalPersons>NaturalPerson

Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 50	This is the unique account holder ID used internally at the Reporting Entity
NameSurname	text	Min 3 Max 100	The full name and surname of the natural person. This should only be letters and spaces.
DOB	YYYY-MM-DD		The date of birth of the natural person
BirthCountry	text	Min 2 Max 2	The country of birth using the ISO 3166-1 Alpha 2 code standard
Residences>Residence>Country	text	Min 2 Max 2	**Multiple residence elements allowed** The country of birth using the ISO 3166-1 Alpha 2 code
Nationalities>Nationality>Country	text	Min 2 Max 2	**Multiple nationality elements allowed** The nationality of the person using the ISO 3166-1 Alpha 2 code
Documents			See below InvolvedParties>Persons>Person>Document

Element: InvolvedParties>NaturalPersons >NaturalPerson>Document

Field Name	Field Type	Length	Description
Type	text	Min 2 Max 2	One of the following Document Types are allowed: - PP (passport) - ID (national id) - DL (driver's license) - RP (residence permit) - AS (asylum seekers document) - OT (other document)
Number	alphanumeric	Min 1 Max 50	The document number of the person for the specified type
Country	text	Min 2 Max 2	The country of issue of the document using the ISO 3166-1 Alpha 2 code

Element> InvolvedParties > NonNaturalPersons > NonNaturalPerson

Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 100	This is the unique involved party ID used internally at the Reporting Entity
Name	text	Min 1 Max 100	The non-natural person name
RegistrationNumber	alphanumeric	Min 0 Max 50	The non-natural person registration number, when available **(OPTIONAL)**
RegistrationDate	YYYY-MM-DD		Company date of registration or date or incorporation, when available **(OPTIONAL)**
RegistrationCountry	text	Min 2 Max 2	The country of company registration using the ISO 3166-1 Alpha 2 code **(OPTIONAL)**

Element> Accounts>Account

Field Name	Field Type	Length	Description
Type	text	Max 4	The following values are accepted: ▪ IBAN ▪ SDB (safety deposit box) ▪ SCS (safe custody service)
Number	alphanumeric	Min 1 Max 50	This is either the IBAN or safety deposit box unique identifier or the safe custody unique identifier
OpeningDate	YYYY-MM-DD		The date which the account was opened or the date when the safe deposit box was leased or the date when the deposit of the item has taken place in the context of a safe custody agreement
ClosingDate	YYYY-MM-DD		The date which the account was closed on or the date when the safe deposit box was relinquished back by the customer or the date when the item in the safe custody agreement was returned to the customers **(OPTIONAL)** If this is not provided this indicates that the account is active.
Parties			**Multiple party elements allowed** See below: Accounts>Account> Parties > Party

Accounts>Account>Parties>Party

Field Name	Field Type	Length	Description
UniqueID	alphanumeric	Min 1 Max 50	This is the unique account holder ID used internally at the Reporting Entity. This should match with the UniqueID of a naturalperson or non-naturalperson provided in the file.
Relationship	text	Min 2 Max 2	One of the following Relationships are allowed: ▪ AC (account holder) ▪ UB (ultimate beneficiary owner) ▪ SG (signatory) ▪ AG (agent)
RelationshipStart	YYYY-MM-DD		The date of relationship start for the account, for the party (OPTIONAL). Even though this is optional, we encourage REs to submit any data they have. For UB relationships, RelationshipStart should be blank.
RelationshipEnd	YYYY-MM-DD		The date of end of the relationship for the account, for the party (OPTIONAL). If not active this should be mandatory(except for UB relationships where this should not have a value)

3. Validations

The CBAR system will carry out 3 levels of validation: schema, statistical and detailed validations. The data will not be accepted into the system prior to the data passing all three levels of validations.

Therefore, if a RE submits a file which fails Level 1 – Schema Checks, validation will be halted at that stage and the errors provided to both CBAR Team and RE.

If Level 1 schema checks fail, this is a blocker and errors are provided without running level 2 statistic and level 3 detailed validations. If Level 2 statistical or level 3 detailed validations fail all the errors for both levels are provided.

It is only after all 3 level checks have passed successfully that data is loaded into CBAR. The RE entity shall be notified once the data has been successful uploading through CBAR. If the file does not pass all validation levels (1,2 and 3), its data will not be available in the CBAR database and therefore not accessible from any CBAR screen/report.

Level 1 – Low Level and Schema Checks

These are schema low level checks based on the technical schema specifications, filename and acceptable reporting entity details/timeframe. Some example of schema checks includes:

- Filename format
- Verifies file against the schema
- Company number and Company Name of reporting entity matches submitting user reporting entity
- File reporting date is received within the allowed time period
  E.g. ReportingDate within last 2 days
- Timestamp must be greater than the last file received in CBAR by the reporting entity
- File submitted reportingdate and timestamp combination cannot be smaller than the last file submitted
  - E.g. if 20200409 reporting date file was submitted, 20200408 file will not be accepted subsequently

Level 2 – Statistical Checks

Rule#	Name	Description
L2.1	Number of natural persons does not match	This validates that the number of natural persons reported in this field matches the submitted natural persons
L2.2	Number of non-natural persons does not match	This validates that the number of non-natural persons reported in this field matches the submitted non-natural persons
L2.3	Number of Accounts does not match	This validates that the number of accounts reported in this field matches the submitted accounts

Level 3 – Detailed Validation Checks

Rule#	Name	Description
L3.1	Invalid Reporting Date	The reporting date cannot be future dated
L3.2	Invalid Timestamp	The timestamp cannot be before the reporting date
L3.3	UniqueID must be unique	UniqueID must be distinct across both natural persons and non-natural persons. For example, if a Natural Person has UniqueID '12345', no other Natural or Non-Natural Person should have the same UniqueID.
L3.4	UniqueID not found in Involved Parties	UniqueIDs found in Accounts must be found in Involved Parties details
L3.5	Account Number should be unique	Any IBAN, safety deposit box identifier, custody boxes identifier must be unique. The number should be unique across all three types. For example, if there is a safety deposit box with number '4556111215', there should not be another safety deposit box/IBAN/safe custody with the same number.

L3.6	Duplicate involved party in account	Involved party should not be found more than once per account with not the same opening date
L3.7	Invalid Maltese ID	Validation of Document Number when Document Country = MT. Number of characters should be greater than 4 in length and must end with A,B,G,H,L,M,P or Z
L3.8	Invalid person name provided – missing space	Person NameSurname field must be separated by at least one blank space
L3.9	Invalid alphabet identified for natural person	Numbers or the following special characters should not be permitted in person names / @ ! , " ( ) * % $ # ; < > ? [ ] ^ _ = +	~ \ The following alphabet is accepted: A to Z, a to z, dashes, and the following accented characters. Á Á à À â Â ä Ä ã Ã å Å æ Æ ç Ç é É è È ê Ê ë Ë í Í ì Ì î Î ï Ï ñ Ñ ó Ó ò Ò ô Ô ö Ö õ Õ ø Ø œ Œ ß ú Ú ù Ù û Û ü Ü
L3.10	Invalid alphabet identified for non-natural person	The following alphabet is accepted: A to Z, a to z, numbers, special character as follows: ` ! # $ % ^ & * ( ) - _ = + [ ] { } " ' @ \ / | and the following accented characters. Á Á à À â Â ä Ä ã Ã å Å æ Æ ç Ç é É è È ê Ê ë Ë í Í ì Ì î Î ï Ï ñ Ñ ó Ó ò Ò ô Ô ö Ö õ Õ ø Ø œ Œ ß ú Ú ù Ù û Û ü Ü
L3.11	Invalid person date of birth – Future Dated	Validates that no dates are after the reporting date and also validates that no dates are earlier than 19100101
L3.12	Invalid non-natural person registration date – future dated	
L3.13	Invalid account opening date – future dated	
L3.14	Invalid account closing date – future dated	
L3.15	Invalid involved party relationship start – future dated	

L3.16	Invalid involved party relationship end – future dated	
L3.17	Invalid account closing date – before start date	The account closing date should be on or after the account start date
L3.18	Invalid relationship closing date – before start date	The relationship end date should be on or after the relationship start date
L3.19	IBAN provided is invalid	When account type is IBAN, the IBAN is validated against the format of Maltese IBANs
L3.20	Invalid person birth country provided	Validates that the Country matches with a Country present in the CBAR system (using the ISO 3166-2 Alpha 2 code format).
L3.21	Invalid person nationality provided	
L3.22	Invalid person document country provided	
L3.23	Invalid non-natural person registration country	
L3.24	Involved Party relationship not valid. Signatory only allowed for natural persons.	Validate that the involved party relationship signatory is only used for person of type natural person
L3.25	Involved Party relationship not valid. Agent only allowed for Account Type SDB and SCS.	Validates that involved party relationship value agent is only allowed when the account type is a safety deposit box or safe custody
L3.26	Duplicate residence for natural person	The same residence iso code is not permitted for the same person
L3.27	Duplicate nationality for natural person	The same nationality iso code is not permitted for the same person
L3.28	Same document type, number and country of issue is not allowed	The same document type and number (for the same country) is not allowed to be used in more than one Natural Person
L3.29	Relationship Start cannot be before Opening Date	The party relationship start cannot be before the account opening date
L3.30	Relationship End cannot be after the Account Closing Date	The party relationship end cannot be after the account closing date
L3.31	Closed Accounts older than 1 month should not be provided	Closed accounts should only feature for the subsequent month
L3.32	Closed Relationships older than 1 month should not be provided	Closed relationships should only feature for the subsequent month
L3.33	Party with Relationship 'UB' should not have a Relationship Start date	If the account party relationship is UB, RelationshipStart and should not have a value
L3.34	Party with Relationship 'UB' should not have a Relationship End date	If the account party relationship is UB, RelationshipEnd should not have a value

L3.35	Party with Relationship 'AC', 'AG' or 'SG' must have a Relationship Start date	If the account party relationship is not UB, then the RelationshipStart must be provided
L3.36	Closed Accounts must have closed relationships	If an account is closed, all relationships must also be closed (with the exception of UBOs)

Future Consideration Notes

- CBAR team may eventually add a company identifier type field which would allow institutions to select from one of the national identifiers type as issued by the ECB. This would allow a regex to be implemented for companies. This is currently considered out of scope.

4. Submissions

Reporting Frequency
RE shall be required to submit data through the CBAR System on a 7 calendar day interval. This shall equally apply even if there are no changes to report within any 7 calendar days ie: RE shall still be required to upload the file with all the data through the CBAR System even if this is exactly the same as the previous file uploaded 7 calendar days before.

Data Submission for Closed Accounts / Person
Accounts and/or relationships which are **closed** should feature for 1 month from the relationship end or close date.

For example, if an account was closed on the 20200315 (i.e. ClosingDate field is filled in) and you are reporting data on the 20200318, the account and natural/non-natural person details should still be reported until date of account closed + 1 month. So that would be mean 20200414 would be the last time this closed account is reported and from 20200415 onwards, the details related to the closed account should not be included in the file upload.

The same example holds for a person (natural / non-natural) who is no longer an involved party. The person (natural or non-natural) would need to feature for an additional 1 month from when the relationship has closed (i.e. RelationshipEnd date is filled in).

Examples:

- if ClosingDate is 15-Jan, then it needs to be reported until 15-Feb (not inclusive)
- if ClosingDate is 15-Feb, then it needs to be reported until 15-Mar (not inclusive)

Mechanism for Submission

Two main submission mechanisms will be provided, through web and API which will allow REs to submit their regulatory data via web services.

For the first stages it is envisioned that only web submission will be available, with the possibility to submit through API being made available in October 2020.

NOTE: Details of this will be discussed further at a later stage.

Filename for Submission

Filename should be of the following format:

CNUM_CBAR_YYYYMMDD_YYYYMMDDhhmmss.XML and this file should be zipped as follows:

CNUM_CBAR_YYYYMMDD_YYYYMMDDhhmmss.ZIP

CNUM represents the registered company number of the reporting entity to submit their information as it has been decided that the reporting entities identification throughout both filename and contents will be the company number (registered with the MBR).

- YYYYMMDD represents the reporting date (this should match the field ReportingDate in the file)
- YYYYMMDDhhmmss represents the timestamp the file was generated (24 hr format) (this should match the field Timestamp in the file)
- The zip file should only contain the one .XML file
- The zip file should not be password protected

Accepted Alphabet

Alphabet used in file submission should be in Latin characters, but should be able to accept European characters such as á â ã ä etc. During searching, the CBAR applicable will have to cater for similar characters e.g. a is similar to á â ã ä.

A to Z, numbers, dashes, special characters (for non-person), and accented characters (Á Á à À â Â ä Ä ã Ã å Å æ Æ ç Ç é É è È ê Ê ë Ë í Í ì Ì î Î ï Ï ñ Ñ ó Ó ò Ò ô Ô ö Ö õ Õ ø Ø œ Œ ß ú Ú ù Ù û Û ü Ü).

File Contents

The file must always content **all the data** for the reporting date.

5. Other Considerations

Multi-Entity Reporting Entities

REs that are part of the same group structure cannot provide one upload to cover the reporting obligations of all Res within its group. Each individual entity within the group is considered as a RE and is required to upload data that relates to its entity, at an individual entity level and not at a group level.

Re-Submissions by Reporting Entity

It may be the case that an institution needs to re-submit a file in between the 7 calendar day interval. The CBAR System will allow for such re-submissions and the reporting date (both on filename and in xml) will reflect this along with the timestamp of the submission.

ISO List

In the CBAR application, it is expected that an ISO list of countries is provided, and which may be maintained as used as part of the rule validations.

Appendix

Annex to this document:

- **CBAR.xsd** this is the XBAR XSD Schema
- **CBAR Example-1.xml** shows the following
  - Natural Person with multiple documents
  - Non-Natural Persons with and without registration information
  - Accounts with
    - single account holder,
    - joint account holders,
    - Ultimate beneficiary and signatories mix
- **CBAR Example-2.xml** shows the following
  - Single account holder for a natural person account
  - Single account holder a non-natural person
  - An approach to tackle ultimate beneficiary owners which may not have a unique ID within the core banking / financial solution available at the Reporting Entity