

# NovaPay – Document 05: Adverse Media Screening Policy

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## Purpose and Scope

Adverse media screening detects reputational and financial crime signals for customers, UBOs, and directors across UK, EU, and US operations.

## Provider

Dow Jones Risk & Compliance integrated with Encompass and Actimize.

## Triggers

Onboarding; annual refresh per risk tier; event-driven (ownership change, law enforcement contact, material press). Weakness: no real-time continuous feed between cycles.

## Categories

Fraud/corruption, money laundering, terrorist financing, sanctions evasion, tax crime, cybercrime, regulatory actions.

## Workflow and SLAs

Automated screen → analyst review within 3 business days → QA → MLRO decision → EDD/SAR if warranted. Backlog currently 50 alerts.

## Metrics (Q3 2025)

~150 alerts/month; true positive 5.2%; average review 2.7 days; event-driven completion 85% (target 100%).

## False Positives

Register maintained; monthly QA (10% sample); quarterly tuning. Weakness: manual review consumes ~40% analyst capacity; indirect UBO coverage incomplete.

## Governance

Monthly Compliance Committee reporting; quarterly Board summaries; Internal Audit annual effectiveness review found absence of continuous media monitoring.

## Improvements

Continuous real-time feed (Q2 2026); automated corporate change triggers (Q1 2026); unified customer risk view (Q3 2026); hire 1 analyst (Q4 2025).

## Conclusion

Framework is reasonable but periodic-only screening and backlog reduce responsiveness to reputational risk.