NovaPay – Document 07: Transaction Monitoring & SAR Filing

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Purpose
Define monitoring and reporting to detect and escalate suspicious activity across all NovaPay products and corridors.

System and Scenarios
SAS AML (rules with behavioral analytics). Twenty scenarios include structuring, velocity, high■risk country flows, dormancy activation, device sharing, crypto spikes, shell company patterns, sanctioned corridors, SME cash anomalies, circular flows, large round amounts, and rapid reversals.

Tuning and Backlog
Quarterly tuning policy, but last tuning was March 2025; September cycle delayed. Alerts average 800/month; 90% investigated within 5 days; alert■to■SAR 4% (~32/month); backlog 120; false positives 88%.

Workflow
Alert → analyst investigation → escalate to MLRO if suspicion → SAR to NCA within 15 days → post■filing learning feedback into tuning.

SAR Stats
FY2024: 380 SARs; FY2025 YTD (Aug): 290; 96% filed within 15 days, 100% acknowledged. Sources: TM (74%), adverse media (15%), fraud/customer (11%).

Weaknesses
Tuning overdue; high volume and fatigue; limited behavioral analytics; no ML triage; thresholds not fully risk■tiered; manual triage for crypto/cross■border.

Resourcing
2 TM analysts handle ~400 alerts each/month; +1 FTE approved Q4 2025.

Improvements
ML pilot for triage (Q3 2026); automated quarterly validation (Q2 2026); backlog <25 by Q4 2025; expand analytics for SME profiling.

Conclusion
Base controls function but efficiency and precision must improve to keep pace with growth.