Case log — four-eyes review

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Two levels of analysis, one reasoned disagreement, access traced by purpose · fictional document

Fictional document — demonstration example

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Fictional document, produced for the demonstration. Roles, dates and reasons are invented. **Nothing is written into any real system. The names in the log are role names**: it is the role that answers for the act, and it is the role an inspection looks for.

Who saw what, when, and on what written grounds

Timestamp	Role	Act	Written reason
02/09 09:02	Agent	Alert taken in and file built	Alert VIG-2026-0118 deposited; scenario RACH-04 v2 quoted
02/09 09:14	**Authorised person**	**Consultation of the national asset-freeze register**	Name of the legal-entity subscriber to be checked

Timestamp	Role	Act	Written reason
02/09 11:30	**First-level analyst**	**Opinion: pursue**	**“Four diverging attributes, name match likely; the redemption follows a documented explanation”**
03/09 08:45	**Second-level reviewer**	**Opinion: undetermined until the subscriber replies**	**“Source-of-funds evidence for 19/07 is missing; the documented explanation does not cover it”**
03/09 08:46	Agent	**Disagreement recorded**	Both opinions kept; neither erased nor arbitrated by the agent
—	**Head of compliance, designated reporting officer**	**Judgement pending**	The alert's status is theirs to settle

Why the disagreement is kept rather than resolved

The analyst who works up the file is not the one who validates it, and the log keeps both names. Two reasoned opinions that diverge are worth more than a single opinion nobody discussed: it is the disagreement that shows, two years later, that the file was looked at twice. **Over the year, 6 disagreements were recorded, 4 of them settled in favour of the second level** — the figure measures how useful the review is, not how good the people are.

Access to the file, by investigation purpose

Role	Purpose accessible	Grounds for access	Withdrawal
First-level analyst	Transaction vigilance	**Recorded in the file, timestamped**	Immediate, traced

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Role	Purpose accessible	Grounds for access	Withdrawal
Second-level reviewer	Transaction vigilance	**Recorded in the file, timestamped**	Immediate, traced
Head of compliance, designated reporting officer	**All four purposes, file by file**	**Recorded in the file, timestamped**	Immediate, traced
Unitholder services	**None** — receives the drafted record requests, without the context of the examination	Not applicable	Not applicable

No generic role runs across the four purposes, and every access carries its grounds. The secrecy attached to a report requires that separation: **article L. 574-1 of the French Monetary and Financial Code attaches a criminal penalty to breaching the confidentiality** involved, which makes the access route a condition of going live rather than a usage guideline.

Decision awaited: Head of compliance and internal control — alert status, countersigned by the second level

External writes: 0

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architecture chosen; roles and permissions are configured and accepted for the identities and systems actually connected; the events logged, their content, their retention period and who may access them are defined for the deployment chosen.