

MODEL
ANTI-MONEY LAUNDERING TECHNICAL ASSISTANCE AND TRAINING COORDINATION MATRIX

LEGAL REGIME / SOCIALIZATION				
ACTIONS/OUTCOMES REQUIRED	PROJECT DESCRIPTION (Status)	DURATION/ SCHEDULE	DONOR / PROVIDER	CONTACT / DELIVERED TO
National Coordination Committee (NCC) established	Determine policy issues Coordinate national linkages and information arrangements			
Action and/or Implementation Plan approved	Assess the legal, institutional, and procedural requirements to conform with FATF Recommendations. Prepare Action Plan and/or Implementation Plan (for set time frame e.g. 3 years, if appropriate) and approve such Plan(s)			
AML/CFT laws to be enacted Implementing Rules and Regulations	Drawing the AML/CFT laws Drawing Regulations for implementation of the AML/CFT law			
AML/CFT Socialization • members of the Parliament Legislative Committee and senior public servants	Develop and deliver a Seminar/workshop on AML/CFT prior to the meeting of the Parliament to consider draft AML/CFT law			
Appropriate public and Political awareness of AML and related areas (Socialization) Socialization of Financial Institutions and Government departments	Develop plan and (foreign) experts to conduct workshops to raise awareness of the AML/CFT issues for: (i) Government officials including, Senior officials and the Judiciary, and (ii) Members of business community both from the public and private sectors to ensure effective implementation of the legislation. Prepare training materials and deliver seminars to train the staff of the financial institutions and non-bank financial institutions, officials of ministries, lawyers, customs officers, businessmen and all those who will be required by the anti-money laundering legislation to detect and prevent money laundering and			

	<p>terrorist financing transactions, and/or to report suspicious transactions to the Financial Intelligence Unit (FIU) or concerned authorities.</p> <p>Deliver seminar/workshops to assist in the public dissemination of the AML/CFT law, prepare the materials and train those delivering the seminar/workshops. Establish the budget for such work to be undertaken.</p>			
OPERATIONAL FIU				
FIU Establishment and Operational Readiness	<p>Seek and obtain assistance to establish and build capacity in an FIU</p> <p>Provision of advice to the leadership of the FIU during initial preparation phase (including in establishing business plan, work plans and initial budgets)</p> <p>Provide advice to FIU as to formation and operational structure</p> <p>Seminar on 'Establishment of an FIU' to be held for the staff of the Central Bank/relevant ministries</p> <p>Train the officers who will be appointed to work in the (FIU) to be established in the near future.</p> <p>Develop an FIU Operations Manual</p> <p>Provide the access fees for the FIU/Central Bank to the ICC Crime Office Database</p>			
	Working within FIU premises and in conjunction with FIU staff, assist in establishing FIU and the general AML regime in the financial, regulatory and law enforcement sectors			
	Develop human resource system for FIU and training program			
	Develop procedures to enter International MOUs			
	Develop international information exchange operational procedures			
	Develop Non Compliance operational procedures and compliance monitoring / analysis techniques			
	Develop operational procedures on receiving, processing, evaluating and disseminating STRs			
	Develop a strategy and timetable to keep the reporting entities informed of new methods and trends (typologies) to assist reporting entities			

Functional Providers of Financial Services (PFS) reporting compliance	Drafting of the following STR guidelines: <ul style="list-style-type: none"> 1. General guidelines for the PFS. 2. Guidelines on STR reports and analysis: STR for Banks STR for non-banks. 3. Customer Identification Standards 4. AML/CFT regime and the role of FIU 5. AMLCFT Typologies 6. Cash Transaction Reporting 7. Compliance and Training Programs 8. Regulating and Prosecuting AML/CFT 			
	In conjunction with FIU, co-ordinate with the banks and financial sector to achieve effective compliance with the KYC, STR and CTR requirements, including: <ul style="list-style-type: none"> 1. Consultation on development of KYC and other regulations; 2. Development of AML compliance programs; 3. Assistance with development of compliance manuals; 4. Conduct "Train the Trainer" workshops in the Financial Sector; 5. Assist the development of a socialization framework. 			
	Develop forms for STR and CTR			
	Establish an intra Governmental working group			
Functional Law Enforcement / FIU Liaison	Establish close-liaison and effective communication between FIU and law enforcement agencies			
	Develop procedures for reporting ML/FT crime cases and obtaining feedback			
	Develop practical implementation of MOU / Operational agreements between the FIU and government agencies			
Adequate Information Technology System support for operational FIU	Ongoing IT strategy, project initiation, procurement assistance, design assistance and review and mentoring.			
Private sector capacity improved	Provision of a compliance manual for the commercial bank staff			

Capacity for the FIU	Mentoring for FIU: 1. Analysis (STR Analysis / AML Typologies) 2. Regulatory and Compliance (Compliance Analysis and Non Compliance Procedures) 3. International and Domestic Cooperation (Liaison / Analytical Support / Feedback)			
Harmonisation of Regulations	Review general financial regulatory framework, identify the need for further regulations to ensure harmonisation, and provide drafts of such regulations, penalties and fines, audit)			
	In conjunction with the FIU, review and co-ordinate efforts of the Central Bank, Customs and the commercial banks in: 1. Harmonising AML regulations 2. Ensuring practical implementation of key elements of KYC and STR Establishing an effective and consistent supervision and compliance framework			
Adequate Information Technology System support for operational FIU	Develop an uncomplicated and inexpensive IT strategy and design, covering electronic reporting, data capture and analysis and dissemination Provide initial hardware, software and development budgets.			
Establish capacity of FIU and associated institutions and agencies in conducting AML/CFT responsibilities (Training)	In conjunction with the FIU conduct a training needs analysis which covers: 1. FIU AML approach, intelligence and analysis techniques, IT tools, STR/CTR target development; 2. Financial sector, KYC, STR and CTR; 3. Reg sector, compliance frameworks for KYC, STR; 4. Law Sector – Police, Customs and AG, AML/CFT analysis and			
	Development and Delivery of the following training modules for FIU, Law Enforcement and Regulators: 1. AML/CFT Typologies 2. AML/CFT Investigation techniques. 3. STR and CTR Analysis. 4. Prosecuting ML/CFT and Proceeds of Crime. 5. Train the trainer.			

	Conferences on AML/CFT need to be attended by staff of the FIU			
	Training on Financial Investigations Program on AML/CFT including audit trailing, financial fraud investigation and forensic accounting			
	Complex Financial Crime Investigation			
	Basic Analysis and STR Reporting training programs need to be attended			

REGULATORY AND GOVERNMENT

ACTIONS/OUTCOMES REQUIRED	PROJECT DESCRIPTION	DURATION/SCHEDULE	DONOR / PROVIDER	CONTACT / DELIVERED TO
An effective KYC regime in the banking sector	Assistance to the Central Bank in strengthening its KYC systems.			
	Provision of on/off site audit procedures for compliance inspection KYC, and AML/CFT systems generally.			
	Building capacity in KYC among commercial banks			
	Assistance to Central Bank to develop administrative guidelines, additions to work manuals			
	Training and attachment at appropriate FIU, for Central Bank examiners/inspection			
	Assistance in developing internal procedures on receiving, processing, evaluating and disseminating the STRs			
An effective KYC regime in the banking sector a. Interim STR Regime	Training program for Banking Supervisors on AML and Patriot Act requirements.			
	KYC Training with Central Bank			
	Training for Central Bank staff to guide their assessment and decision-making in relation to any future STRs received by Central Bank			

CUSTOMS

Customs Capacity enhancement	Provide training on anti money laundering border enforcement (incl. Intelligence, detection method, investigation of currency smuggling, AML/CFT law and regulations, etc)			
	Provide equipment for AML/CFT border enforcement			
Effective reporting mechanism for the control of international / cross-border transportation of currency	Review the functionality and efficiency of the reporting system for international / cross-border transportation of currency (incl. Detailed procedures / mechanism / method of report from Customs to FIU, forms, equipments, etc.)			

MINISTRY OF FOREIGN AFFAIRS

Legal Framework for AML regime	Draft mutual legal assistance in criminal matters rules and regulations, preparation of an operational procedural manual with precedent documents in respect of the making/ receiving and processing of mutual assistance applications			
Harmonised International approach to AML/CFT	Provide training and socialization to staff on AML/CFT laws and regulations			

MINISTRY OF JUSTICE

Drafting regulations	Draft mutual legal assistance in criminal matters law, rules and regulation (treaty)			
Undertake socialization	Coordinate all socialisation activities in respect of the AML/CFT law			

LAW ENFORCEMENT

ACTIONS/OUTCOMES REQUIRED	PROJECT DESCRIPTION	DURATION/ SCHEDULE	DONOR / PROVIDER	CONTACT / DELIVERED TO
POLICE				
Police Capacity to investigate and successfully prosecute money laundering	Establish relationships between the FIU, law enforcement agencies and other regulators with investigation responsibility to ensure effective investigation and prosecution of AML/CFT laws.			

LAW ENFORCEMENT

ACTIONS/OUTCOMES REQUIRED	PROJECT DESCRIPTION	DURATION/SCHEDULE	DONOR / PROVIDER	CONTACT / DELIVERED TO
and financing of terrorism cases. Development of the necessary skills and institutional capacity in POLICE to enable investigation and enforcement of AML laws.	Train relevant staff from police to undertake money-laundering investigations and terrorist financing.			
	Mentoring for police in conducting financial analysis in trans-national organized crime (terrorist financing). Establish Trans-National Crime Unit Project: <ul style="list-style-type: none"> - Strengthen knowledge and skills in CT - Institutional strengthening of TNCC - Management of criminal - Project management 			
	Advise FIU on operational and administrative arrangements to establish relationships with law enforcement agencies.			
Police Capacity to investigate and successfully prosecute money laundering cases	Provide equipment in countering financing terrorism			
	Attend training for regional Police officers in financial investigations,			
	Attend Complex Financial Crimes Investigation course			
	Attend Basic Analysis and STR Reporting Training			

LAW ENFORCEMENT

ACTIONS/OUTCOMES REQUIRED	PROJECT DESCRIPTION	DURATION/ SCHEDULE	DONOR / PROVIDER	CONTACT / DELIVERED TO
OFFICE OF THE PROSECUTOR				
Ensure that the Public Prosecutor's Office has the necessary skills and institutional capacity to prosecute money laundering offences	Build the institutional capacity of the Prosecutor's Office to prosecute money laundering offences			
	Provide training in asset forfeiture			
	Mentoring for prosecutors in successful prosecution of ML/FT cases and the preparation of a procedural manual with precedents of all necessary documents			
	Provide training in financial investigative techniques and prosecutors for money laundering offences			
	Attend Basic Analysis and STR Reporting training			
COURTS/JUDICIARY				
Improve capacity and efficiency of the Judiciary in relation to AML/CFT, international mutual assistance and transnational crime.	<p>Train judges and other relevant sections of the judicial system in the adjudication of AML/CFT, mutual assistance cases and applications and dealing with transnational crime</p> <p>Review the court Rules and Regulations to ensure the efficient disposal of AML/CFT cases and mutual assistance applications.</p> <p>Establish monitoring systems to ensure AML/CFT cases are dealt with quickly.</p>			