



DISRUPTING CRIMINAL TRAFFICKING AND SMUGGLING NETWORKS THROUGH INCREASED ANTI-MONEY LAUNDERING AND FINANCIAL INVESTIGATION CAPACITY IN THE GREATER HORN OF AFRICA

(AML-THB in the GHoA)



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AML-THB NEWSLETTER

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MESSAGE FROM THE PROJECT DIRECTOR



2020 is gone, long live 2021!

I am happy to say this as we see the back of a year shattered by tragic events and a deadly pandemic.

We approach 2021 with great hopes, and many resolutions. It is on this positive and ambitious note that the project will build on in the new year, as Federico will explain to us in this issue.

AML-THB Project is not an ordinary project, in the sense that our approach is significantly different. We recognize that it is the EU Trust Fund that finances and guides us, and CiviPol that sustains and supports us in this project that constitutes a patchwork

of the agencies fighting against organised crime, trade-based money laundering, financing of terrorism, human trafficking, corruption and tax evasion, coordinate their fight at local, regional and international level. Our motto says: "If you want to go fast, go alone; if you want to go far, go together". Indeed it is the sum of individual experiences that is crucial, not the experience of one individual. Shared experiences will be the source of many interactions, facilitating investigations, prosecutions, convictions and confiscations.

Our editorial content will remain true to its focus and this newsletter will highlight your experiences and achievements through the project.

On behalf of the entire project team and HQ, I wish you a Happy New Year, all possible success in the fight against trade-based money laundering and all crimes that illegally generate profits to serve other illegal activities, terrorism, corruption and human distress!

Enjoy this first issue of the year.



Frédéric Bayard
Project Director

of international, regional and highly qualified national experts, combined wonderfully with a multicultural field team, dedicated and committed to serve for the benefit of all. This is what has allowed us to offer you the best according to your individual needs.

This project also serves all institutions with the final goal of ensuring that all

In This Issue



MAURITIUS HITS CRIMINALS WHERE IT HURTS MOST

The key aim of the Act, although it is not explicitly stated, is to deny criminals the financial benefits of their crimes. Seasoned criminals have no fear of prison, which often provides them with opportunities to extend their criminal networks and plan further crimes. The British criminals' dictum "If you can't do the time, don't do the crime" applies here.



AML-THB REGIONAL PROJECT IN THE GREATER HORN OF AFRICA - SEMESTER PLANNING

The project adapted to this new reality very well by ensuring the implementation of 17 training and awareness raising activities. Globally, a total of 664 participants attended them. Due to the unpredictability of the Pandemic evolution and the risks related to it, the institutional capacity building activities were mainly e-meetings (12) with only a few in-persons (5), mostly implemented in early 2020.

SYNOPSIS

Effective Financial Investigation and Use of Financial Evidence in Prosecution of Trafficking in Human Beings (THB) - Smuggling of Migrants (SoM)

7–11 December, 2020

Alma Wanyama

Senior Technical Advisor to the AML-THB Project and training coordinator

Addressing the threat of human trafficking requires a prodigious understanding by investigators of how to effectively conduct financial investigations within the confines of their national laws; and owing to the transnational nature of these crimes, an understanding of the existing laws in other jurisdictions in the region is important.

Background

Eastern and Southern Africa (ESA) in general and the Greater Horn of Africa (GHOA) region in particular are faced with multiple transnational criminal security threats of terrorism, violent extremism, terrorism financing and forms of serious organised crimes including trafficking of human beings, smuggling of migrants and money laundering. To address the criminal threats, the European Union has launched a project: “Disrupting Criminal Trafficking and Smuggling Networks Through Increased Anti-Money Laundering and Financial Investigation Capacity in the Greater Horn of Africa”, (referred hereafter as AML-THB project).

The AML-THB Project continues to incorporate counter financing of terrorism (CFT) in addition to AML and THB, because of the existing challenge, but also the interlink between organised crime, terrorism financing and terrorism. The project aims to strengthen national anti-money laundering and counter illicit financial flow capacity, increase understanding of the criminal networks and their flow of illicit finance, and enhance coordination of agencies, among other things.

Addressing the threat of human trafficking requires a prodigious understanding by investigators of how to effectively conduct financial investigations within the confines of their national laws; and owing to the transnational nature of these crimes, an understanding of the existing laws in other jurisdictions in the region is important. Similarly, a great understanding by prosecutors on financial investigation and evidence is equally important in the fight against THB-SoM. The investigators are charged with investigation capacities described under their national laws in accordance with international protocols while the prosecutors are charged with powers to prosecute criminal cases in their jurisdictions as far as their national laws permit.

Similarly, financial Intelligence Units (FIU) are important agencies in the multi-agency approach as they serve as a national centre for the receipt and analysis of Suspicious Transaction Reports (STRs) and other information relevant to money laundering, associated predicate offences and financing of terrorism, and for the dissemination of the results of that analysis to relevant investigation agencies. Consequently, the fight against trafficking in human beings and smuggling of migrants, necessitates a workable effective relationship between the investigators and the prosecutors, proper coordination with the FIUs, as well as an understanding of how to effectively gather financial intelligence and translation of the same into financial evidence that can be used in court.

The AML-THB project conducted two regional workshops on Enhancing Collaboration between Law Enforcement Agencies and Financial Intelligence Units (FIU) in Targeting and Disrupting the Financing of Trafficking in Human Beings (THB)-Smuggling of Migrants (SOM) Criminal Networks held virtually on 21-25 September, 2020 and 26-30 October, 2020 respectively. Intelligence officers, investigators and financial intelligence officers participated in the workshops. The sessions showed the need to create a similar forum for investigators, Financial Intelligence Units and prosecutors focusing on financial investigation and evidence and also for these two agencies to share experiences and good practice on a national and regional level as well as encourage networking of the practitioners.

Therefore, this workshop will include the investigators and the prosecution services from Djibouti, Eritrea, Ethiopia, Kenya, Sudan, Somalia, South, Tanzania, Uganda, Yemen, Seychelles, Mauritius, Madagascar, Malawi, Mozambique and the Comoros. The forum is expected to continue according to terms and conditions to be agreed upon during the meeting, as may be necessary.

Objectives and results of the training

The regional workshop aimed at enlightening the investigators, financial intelligence officers and prosecutors on how to effectively use financial investigation to successfully fight THB as well as understanding financial evidence and how to convert financial intelligence into evidence usable in court. It is also aimed at strengthening collaboration between the investigators and the prosecutors in financial investigation of THB-SoM through existing legal and operational channels as well as enhance effective coordination with FIUs. This will be done by highlighting how law enforcement can use financial information from AML to help investigate and prosecute THB cases as well as unearth the criminal networks. The specific objectives of the forum were to:

1. Enhance collaboration between the FIU, investigators and prosecutors and outline the importance of information sharing and multi-agency approach in financial investigation of THB-SoM;
2. Facilitate a platform for information exchange between the FIUs, investigators and prosecutors;
3. Better understand financial intelligence and its conversion to evidence;
4. Better understand financial investigation and the role of the financial sector in disrupting criminal networks through effective AML measures;
5. Better understand prosecution led investigation and how to present financial evidence in court;
6. Promote better understanding of human trafficking and smuggling, the modus operandi of the criminal networks and their financial flow nationally, regionally and internationally;
7. Promote better understanding and importance of handling of victims of human trafficking;
8. Explore practical cases and exchange experiences and good practices practically;
9. Identify challenges in multi-agency cooperation and explore how to mitigate them to enhance better collaboration between the two agencies nationally and regionally.

To achieve these objectives, the training covered the following topics as identified by the Concept Note and the training programme:

1. Perspectives of human trafficking and migrant smuggling financial networks;
2. Effective use of evidence in judicial proceeding - View from the bench - A judge's perspective;
3. Effective use of evidence in judicial proceeding - View from the prosecutor - Best practices in the field - financial investigations in crimes of THB and SoM;
4. The role of law enforcement in financial investigation;
5. Financial Intelligence Units and THB-SoM;
6. Importance of pre and post conferencing of investigators and prosecutors in financial investigation and prosecution;
7. Prosecutions, international cooperation and coordination in the field of tracking THB and SoM;
8. Financial evidence in prosecution of THB-SoM cases;
9. Intra and inter-state collaboration, coordination and information sharing;
10. Importance of successful partnership between investigators and prosecutors;
11. Interactive experience and good practices exchange,

Training delivery

The forum was implemented in a video conference given the restric-

tions imposed by countries to contain the spread of the COVID-19 pandemic. The workshop incorporated an interactive approach through facilitated open dialogue, question and answer sessions, critical plenary discussions, group exercise and expert presentations. The workshop, to the extent possible, facilitated and supported informal inter-experts networking among interested participants. The forum deployed and encouraged open but also critical discussions facilitating mutual learning while observing Chatham House rules of engagement. Moderators and the facilitator, encouraged participants to contribute in the forum.

The forum was carried out in five, half day sessions within one week on the ZOOM platform, to enable participants to understand the thematic areas from both the law enforcement and the financial intelligence units as well as identify areas of collaboration among these agencies in Human Trafficking and Smuggling of Migrants investigation. The forum will be done on the ZOOM platform due to the revised and improved security, the various features available as well as the fluidity provided by the bandwidth of the network. This has proved to be the most reliable platform in the region in terms of interconnectivity.

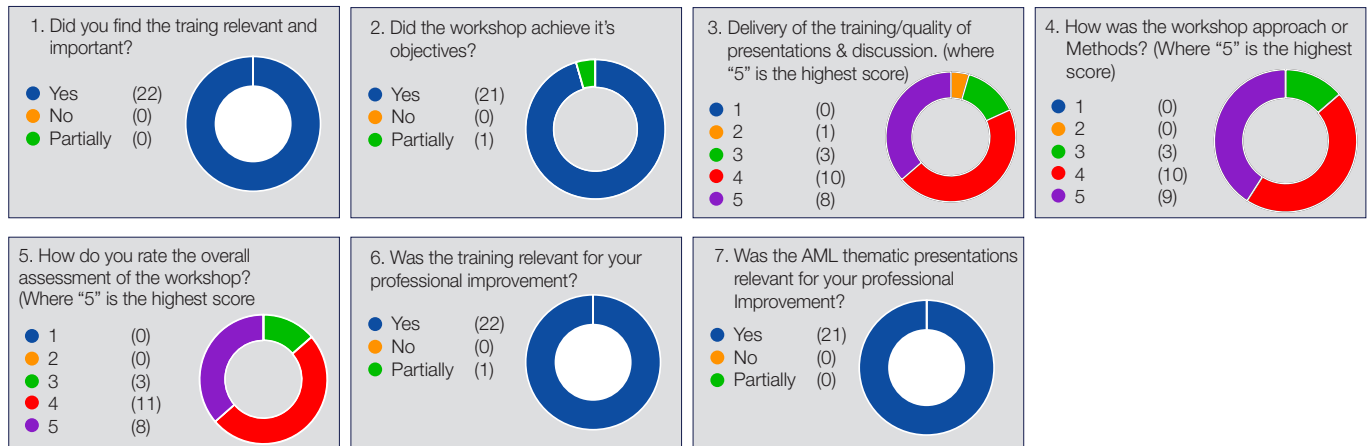
The training workshop brought together 34 participants from; The National Police Service – Investigations Unit, Financial Intelligence Units and the Prosecution Services. 12 countries.

No.	Country	Institution	No. of trainees		
			Female	Male	Total
1	Djibouti	LEA		1	1
		ODPP	1		1
2	Ethiopia	FIU		1	1
3	Kenya	LEA	1	2	3
		ODPP	1		1
		KSMS	1		1
4	Somalia	FIU		1	1
		LEA		1	1
		ODPP		1	1
5	South Sudan	LEA		3	3
		FIU		1	1
6	Tanzania	LEA		1	1
7	Uganda	LEA	1		1
		FIU	1		1
8	Yemen	LEA		1	1
		FIU		1	1
		ODPP		1	1
9	Mauritius	LEA	1	2	3
		ODPP		1	1
		IRA	1	1	2
		MRA		1	1
		FIU		1	1
10	Malawi	LEA		1	1
11	Madagascar	FIU		1	1
12	Seychelles	LEA		1	1
		ODPP	1		1
		FIU		1	
Total			9	25	34

Post-training evaluation and feedback

Participant feedback via an online MS Survey questionnaire highly rated the training in terms of its relevance/importance, meeting its objectives, value addition, the quality of delivery and the level of participation. Feedback received informally on the presentations and sessions has been very posi-

tive. The training established a WhatsApp group to enable the participants share information, experiences and learn from each other. **Below are data excerpts from the MS Survey analysis:**



Experts who facilitated the sessions:

- Steve Farrer MBA CAMS CFE, Mr Farrer has been, for the past 5 years, actively involved in working with the financial services sector, under the anti-money laundering (AML) framework, to help identify and mitigate the illicit proceeds from human trafficking (modern slavery).;
- Maarten NOORDZIJ – Dutch Senior Public Prosecutor;
- Judge Kossy Bor, Senior Judge in Kenya and a trainer with AML-THB project;
- Carole Tabaro- Uganda Prosecutor and Gold ToT certified Expert
- Tony Fitzpatrick, Head of Reporter Engagement Team, UK Financial Intelligence Unit (UKFIU), National Economic Crime Centre (NECC) National Crime Agency
- Alma Wanyama, Technical Advisor with the AML/THB Project, who is also the coordinator and moderator of the training



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SYNOPSIS

Regional Webinar on FATF Standards on Effectiveness

14 - 17 December, 2020

Tuemay Aregawi

Senior Technical Advisor to the AML-THB Project and training coordinator

Countries of the GHoA and ESA, except Uganda, Yemen and Mauritius, are no longer under the FATF's International Cooperation Review Group (ICRG) review process or grey list. However, from the effectiveness compliance perspective, the region is still faced with limitations. Assessment of effectiveness or achievement of outcomes is determined by many agencies that demand concerted national efforts and coordination.

Background

Eastern and Southern Africa (ESA) in general and the Greater Horn of Africa (GHoA) region in particular are faced with multiple transnational security threats including terrorism, violent extremism, terrorism financing and forms of serious organised crimes including trafficking of human beings, smuggling of migrants and money laundering. To address the criminal threats, the European Union has launched a project *"Disrupting Criminal Trafficking and Smuggling Networks Mauritius hit criminals where it hurts most Through increased Anti-Money Laundering and Financial Investigation Capacity in the Greater Horn of Africa"* (referred hereafter as AML-THB project). The AML-THB Project continues to incorporate counter financing of terrorism (CFT) in addition to AML and THB, because of the existing challenge but also as an interlink between organised crime, terrorism financing and terrorism. The project aims to strengthen national anti-money laundering and counter illicit financial flow capacity, increase understanding of the criminal networks and their flow of illicit finance, and enhance coordination of agencies, among other things.

Since 2013, The Financial Action Task Force (FATF) adopted a new methodology¹ of assessing compliance of national AML-CFT systems to mitigate the risks of money laundering, the financing of terrorism and proliferation of weapons of mass destructions. In the AML-CFT context, assessing effectiveness² is key to evaluate and ensure outcomes of national policies, legislations and operations contributed by all relevant agencies. FATF effectiveness standards is about assessing outcomes (results), identifying achievements and gaps, and enabling countries to prioritise improvement measures.

The AML-CFT regime in the GHoA countries have improved in their observation of the FATF technical compliance standards. However, in terms of effectiveness or achieving the desired outcomes, countries in the region are facing critical challenges.³ Countries of the GHoA and ESA, except Uganda, Yemen and Mauritius, are no longer under the FATF's International Cooperation Review Group (ICRG) review process or grey list. However, from the effectiveness compliance perspective, the region is still faced with limitations. Assessment of effectiveness or achievement of outcomes is determined by many agencies that demand concerted national efforts and coordination. The Eastern and Southern Africa Anti-money Laundering Group (ESAAMLG) Mutual Evaluation Reports (MERs) on AML-CFT effectiveness assessments on its member countries revealed that no nation has scored either substantial or high level of effectiveness in any of the 11 FATF Immediate Outcomes (IOs)⁴. Members of the Middle East and North Africa (MENA) FATF from the GHoA region have not yet carried out mutual evaluation under the new FATF methodology but may not be different from the GHoA countries.

The key gaps in effectiveness that national AML-CFT systems face include reporting of STRs, investigation, prosecution and conviction of ML-TF cases incommensurate with the national risk profiles of countries, and inadequate in number and quality. Similarly, the rate of successful risk-based supervision, detection, investigations, prosecutions, convictions and asset recovery is at a minimal. Some of the beneficiary countries are undergoing or have a plan to undertake mutual evaluations, while others (Ethiopia, Kenya, Uganda) are reviewing their national risk assessment that may benefit from enhanced understanding of the FATF effectiveness assessment framework.

To this end, the AML-THB project, organised an online meeting: **"Regional Webinar on FATF's Assessment of Effectiveness" held on 14–17 December, 2020**. The webinar brought together eighty-three (83) participants from law enforcement agencies (LEAs), prosecution, judiciary, Financial Intelligence Units (FIUs), regulatory bodies, asset recovery agencies, customs services/tax authorities and other relevant national agencies from the beneficiary GHoA and the observer countries of ESA (see table below).

Objectives and results of training

The webinar aims to promote awareness on the importance of achieving results in line with the FATF standards and enhance coordination between relevant national agencies in the AML-CFT system. The webinar is expected to strengthen the participants' understanding of the FATF effectiveness assessment methodology in general and elements of the Immediate Outcomes (IOs). It is also expected to contribute to better assessment ratings of national AML-CFT system effectiveness ratings. At the end of the training, participants were expected to:

- Understand ML/TF-THB risks and applying risk-based approach;
- Better understand the framework of the effectiveness assessment methodology and the immediate as well as intermediate outcomes;
- Appreciate the importance of effectiveness assessment to improve outcomes of national AML-CFT systems by applying risk-based approach;
- Appreciate the importance of a multiagency approach in effectiveness and the role of each agency;
- Understand the state of play of the region in terms of effectiveness and appreciate the need for focusing on outcomes; and
- Appreciate the existing gaps and challenges and outline way forward to improve effectiveness.

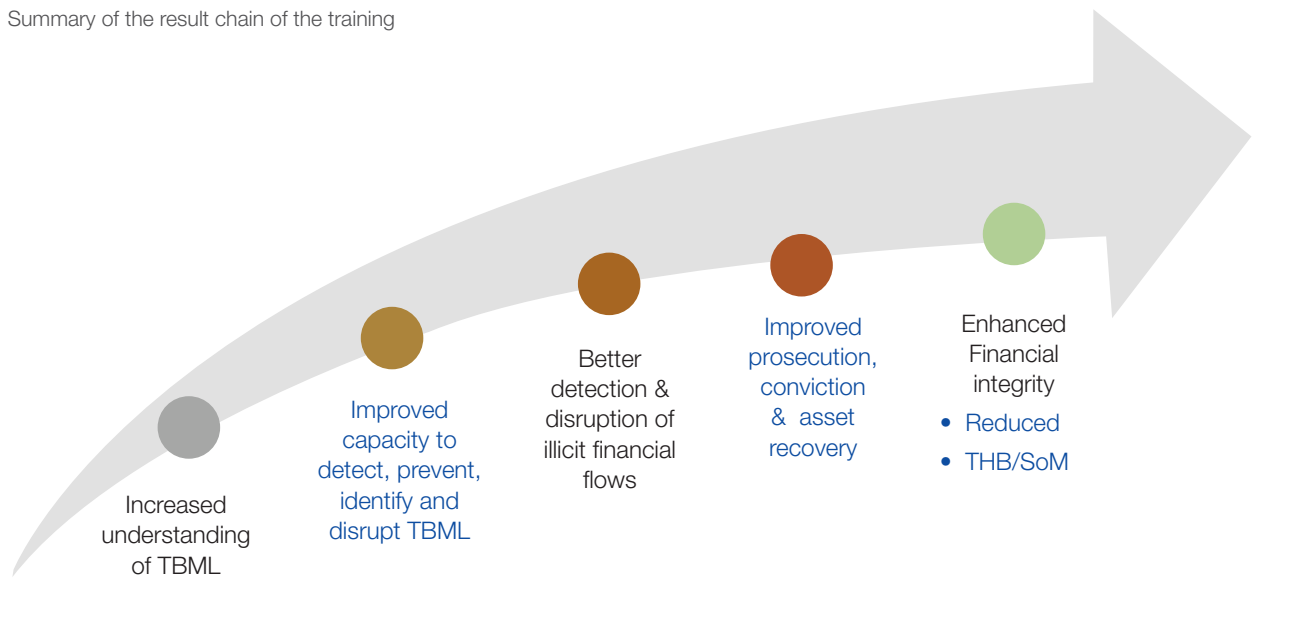
1. FATF (2013) Methodology for assessing technical compliance with the FATF recommendations & the effectiveness of the AML/CFT systems, <https://www.fatf-gafi.org/publications/mutualevaluations/documents/fatf-methodology.html>


2. For the purpose of this activity, FATF's (2013, page 15) definition of effectiveness as "The extent to which the defined outcomes are achieved" is adopted

3. ESAAMLG's MER reports of its member states, www.esaamlg.org/index.php/Mutual_Evaluations_Second

4. ESAAMLG Second Round Mutual Evaluation Reports, <https://www.esaamlg.org/index.php/Mutual_Evaluations_Second>

Summary of the result chain of the training



 The training was facilitated by experienced experts from the ESAAMLG who have direct practical knowledge on the FATF methodology and its effectiveness standards and state of play of the region. The experts are also highly acquainted with mutual evaluation guidelines and review mechanisms. The experts who served as trainers are Muluken Yirga Dubale, ESAAMLG and Phineas Moloto, South African FIU and ESAAMLG. Yotsna Lalij Venketasawmy- AML-CFT Adviser to the Ministry of Financial Services and Good Governance of Mauritius spoke in the webinar.

Through the above stated results at individual level, the webinar, together with other interventions by the project, is expected to:

- Improve effectiveness of national AML-CFT systems ratings in their subsequent MERs;
- Improve operational effectiveness of AML-CFT systems including but not limited to:
 1. Quality and adequacy of STRs
 2. Detection, identification and disruption illicit financial flows
 3. Investigate, prosecute and convict ML/TF
 4. Risk-based supervision
 5. Improve national and international co-operation and information exchange among national agencies in the region

To sum up, the training was organised with the goal of contributing to the improvement of effectiveness of national AML-CFT systems by enhancing awareness and understanding of the assessment methodology and addressing the existing gaps.

Training delivery

The training was conducted over half a day (about 3.5 hours) for four consecutive days to suit the conditions of e-training. The total training period was about 14 hours which is equivalent to 2.5 working days in total. The training was facilitated through Zoom Cloud Meeting videoconferencing platform, which was selected due to its flexibility, user friendliness and better facilities like recording. The training workshop brought together 83 participants representing FIUs, crime

investigation units, prosecutions, customs services, tax authorities, central banks, judiciary, asset recovery agencies and other supervisory bodies from 11 countries. The number of participants unexpectedly increased two-fold because of higher demand by some countries, notably Mauritius (30), Mozambique (9), Seychelles (9) and Somalia (8).

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The training covered the following topics as identified by the Concept Note and the training programme.

- **Overview of the framework of effectiveness assessment:** Methodology and effectiveness

This session introduced the overall FATF standards and their interlinkage to enable participants who come from different back-

Participant summary: Regional webinar on FATF Standards on Effectiveness

Country	Djibouti	Ethiopia	Kenya	Somalia	S. Sudan	Sudan	Tanzania	Yemen	Mauritius	Mozambique	Seychelles	Total
Female	1	-	4	-	1	1	-	1	15	1	8	32
Male	1	1	2	8	-	6	6	3	15	8	1	51
Total	2	1	6	8	1	7	6	4	30	9	9	83

grounds to have adequate understanding of the frameworks covering the overview of the FATF and its instruments, FATF recommendations, assessment methodology (technical and effectiveness compliance) and the integrated application of the standards. The session summarized that the standards are not mutually exclusive, rather they are interlinked and reinforcing. Each FATF recommendation is interlinked with the effectiveness standards called the immediate outcomes.

- Effectiveness and multiagency approach:** Elements of IOs, roles of various agencies and coordination. This session deliberated on the 11 IOs, interdependency and links with the technical compliance elements and the FATF recommendations. The session discussed risk in relation to the FATF effectiveness standards. It highlighted that effectiveness is about achieving desired outcome/results in addressing the threats and vulnerabilities and further mitigate risks – ML/TF/PF and THB/SoM in our context. The session also outlined that the IOs are understood and implemented commensurate with other standards – risk identification and context setting as depicted below. Risk and context guide the reinforcing technical and effectiveness assessments to produce integrated conclusions and recommendations. More importantly, key parameters on how the achievement of each IO have been outlined and discussed that informed participants about what is expected and how better it can be achieved. For each IO, the trainers shared key implementation issues – components, challenges and tips that can help participants better understand the assessments against each IO and the corresponding comments.
- Status of the GHoA countries on AML-CFT effectiveness:** Reflections of the state of play of the ESAAMLG region on AML-CFT effectiveness: This session reflected on ESAAMLG member countries’ mutual evaluation findings including assessment rating standards, scoring of countries, limitations of countries in implementing effectiveness, key challenges and suggested recommendations have been deliberated. The discussion emphasised on how countries should keep information that is relevant and consistent and the misleading role of statistics in evaluations. The findings showed that all assessed countries scored low level effectiveness (LE) and moderate level effectiveness (ME) as can be seen in the table below. This session also shared the experiences of Mauritius in implementing the effectiveness standards that highlighted the findings of the mutual evaluation, weaknesses observed, challenges and recommended measures. As Mauritius is under FATF grey list, the practical experience shared was instrumental in sensitising the participants with regard to the key deficiencies, challenges and post-evaluation strategies to effectively implement the standards.
- FATF grey listing:** Consequences and Interventions. This session briefly discussed the process of the ICRG review,

monitoring and evaluation mechanism. It also highlighted the consequences of grey listing to countries - the significant harm it can cause to a country in economic, financial, political, legal and international cooperation aspects not only influences from the FATF but also other partners like the European Union that follow similar patterns in their jurisdictions.

- Lessons Learnt and way forward:** This session was a moderated open discussion and participants identified the key challenges and limitations of effectively implementing the effectiveness standards and outlined suggested recommendations at national and international dimensions. The findings are captured in the final report and will be communicated to relevant stakeholders.

Post-training evaluation and feedback

The training has achieved its immediate results (outputs) in line with the key result indicators outlined in the Concept Note based on the DOA of the Project. The survey revealed that the training webinar is highly valued and higher majority of participants believed that training would help them improve knowledge and skills that can contribute to the overall improvement of national AML-CFT effectiveness. The training has brought together different competent authorities from most of the participant countries that have allowed them to share their practical experiences and discuss their challenges among themselves that is expected to facilitate building common understanding and, likely, foster informal cooperation. The training established a WhatsApp Group to enable the participants share information, experiences and learn from each other.

Like the previous activities, this training webinar was highly rated by trainees who participated in the post-training survey (64/83 or 75.90%) agreed or responded yes as summarized below¹:

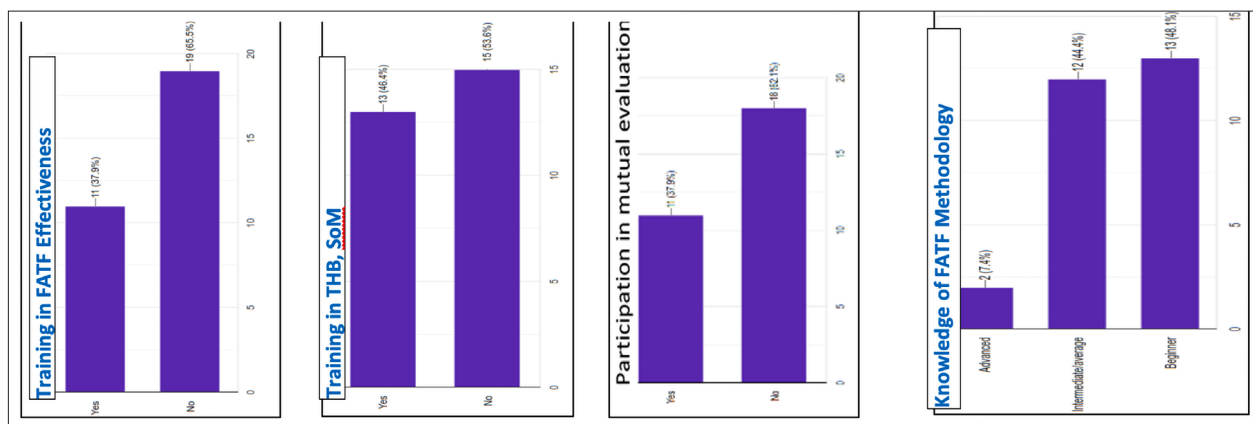
- Relevance and importance - 100%;
- Achievement of objectives - 95.24%;
- Value addition in understanding the importance and knowledge of the FATF’s assessment methodology and effectiveness standards - 98.44%;
- Improvement of individual knowledge & skills to implement effectiveness standards - 93.65%;
- Contribution to the overall improvement of national AML-CFT effectiveness - 92.20%;
- Delivery/quality of presentations and discussions - 87.50% high or very high;
- Interactivity and engagement – training approach - 76.56% high or very High;
- Overall assessment - 89.06% high or very high; and
- Recommendation to other trainees – 98.44%

1. For further details, refer the post-training survey summary to be annexed on request, as may be relevant

Lessons learnt and way forward

The pre-training survey revealed that the level of knowledge and skills on the FATF methodology in general and the effectiveness standards in particular is low. The same is true to THB-SoM. In this regard, the

training was slightly modified to include general overview and conceptual frameworks of the FATF methodology and basic concepts. This suggests the need for further training on the subjects. See below summary of charts excerpted from the pre-training survey.



From the charts above, nominating institutions do not seem to give emphasis to the requirements of the trainees recommended in the concept note, neither did the Project strictly observe eligibility rules and refuse to admit candidates who did not qualify.

In this training, participants raised the following issues for further considerations:

1. Most participants were active in engaging themselves in the training in form of questions and answers, contributions and comments, but the big size of participants meant lessened active participation from all trainees;
2. Time was limited to cover all the topics and discuss in depth, particularly in running group work exercises;
3. Demand for deeper technical training on THB-SoM and

country specific trainings on the FATF effectiveness to reflect specific contexts supported by real cases and exercises

4. Organise a face-to-face training once the risk of the pandemic is contained for the reason that virtual training has some inherent limitations, for instance, connectivity, active contributions, attendance, etc.
5. Dissemination of training materials before the training. In fact, methodologically, this has its own drawbacks and will be carefully addressed in consultation with respective trainers
6. Organise similar training to decision/policing level senior officials to create awareness and conducive environment
7. Organise training on related topics particularly financial investigation, asset recovery, international cooperation and AML-CFT.



Reflections of the state of play of the ESAAMLG region on AML-CFT effectiveness: This session reflected on ESAAMLG member countries' mutual evaluation findings including assessment rating standards, scoring of countries, limitations of countries in implementing effective, key challenges and suggested recommendations have been deliberated. The discussion emphasised on how countries should keep information that is relevant and consistent and the misleading role of statistics in evaluations.

MAURITIUS HITS CRIMINALS WHERE IT HURTS MOST

The EAC: AML-THB Issues and the Role of Mauritian Legislation

Paul Keyton

Director - IRSA

Seasoned criminals have no fear of prison, which often provides them with opportunities to extend their criminal networks and plan further crimes. The British criminals' dictum "If you can't do the time, don't do the crime" applies here.



The EAC is no stranger to THB and its attendant evils. Member states are both sources and destination countries for men, women, and children subjected to forced labour and sex trafficking. Women and girls, particularly those who are internally displaced, orphaned, refugees, or from rural areas, are vulnerable to forced labour and sexual exploitation, often in urban centres.

In this article I outline the mandate of the Integrity Reporting Services Agency, the Mauritian law enforcement agency, to which I belong to and the key elements of the legislation which established it.

Although it may not be readily appreciated, it is no exaggeration to describe the Good Governance and Integrity Reporting Act 2015 (the Act), which established the Agency, as the pre-eminent legislation of its kind, unsurpassed in its scope and application by any other statute world-wide.

This is not just my opinion but also that of Lord Phillips, the first President of the Supreme Court of the United Kingdom and formerly the UK's most senior judge. Lord Phillips now chairs the Integrity Reporting Board, the body that oversees the Agency's work and interprets the Act in practice.

The Act's principal feature is that it allows for the confiscation of property without the need for lengthy and uncertain criminal proceedings. And it is highly effective when deployed in cases in which criminal enrichment is strongly suspected but cannot be proven, since it places the onus on the holder of property to explain how it was acquired.

The application of the Act is, at least in theory, simplicity itself. The Agency identifies property owned or under the control of a citizen of Mauritius, wherever it is located, and asks him or her to explain, by way of an affidavit, the source of the funds used to acquire it. The owner is then obliged to show that, on the balance of probability, the funds came from legal sources.

Failure to convince the Agency and its Board that property has been legitimately acquired renders it liable to confiscation by way of an "Unexplained Wealth Order" issued by a Judge in Chambers and title to it then vests in the Agency. The proceeds either of a sale of the property or directly if cash is involved, are deposited in the National Recovery Fund, the use of which is governed by the Act and includes, inter alia, alleviating poverty.

The key aim of the Act, although it is not explicitly stated, is to deny criminals the financial benefits of their crimes. Seasoned criminals have no fear of prison, which often provides them with opportunities to extend their criminal networks and plan further crimes. The British criminals' dictum "If you can't do the time, don't do the crime" applies here. However, if a criminal has no home, cars, yachts, Rolaxes or other trappings of wealth to enjoy on his release, then his prison "time" has all been for nought.

The Act is draconian and has built in safe guards to prevent its misuse through either the pursuit of a personal or political agenda but its key elements can be easily incorporated in legislation tailored to each jurisdiction. These include the value below which property cannot be confiscated. In Mauritius, this is currently approximately US\$ 255,000, but in the UK, a far larger economy, the limit is approximately US\$ 68,000. Mauritian citizens do not have to account for any property acquired more than seven years ago, but in the UK, there is no such provision.

However, a legal framework is useless without the political will to enforce it and effective inter-agency cooperation. Fortunately, the political will exists in Mauritius and the Agency is independent and unfettered.

The EAC AML-THB application for such legislation is clear and although the Agency has no particular mandate in this regard, it is interested in illicit enrichment however it arises, be it from corruption, narcotics trafficking, money-laundering or other forms of criminality. However, THB is possibly the vilest crime imaginable; it generates vast profits for its perpetrators and as was so eloquently explained during the recent GHoA Regional Workshop, it can be extremely difficult to prosecute. Transnational in nature and extremely violent, victims and witnesses can be intimidated or even killed whilst the king-pins remain physically remote and beyond prosecution.

The EAC is no stranger to THB and its attendant evils. Member states are both sources and destination countries for men, women, and children subjected to forced labour and sex trafficking. Women and girls, particularly those who are internally displaced, orphaned, refugees, or from rural areas, are vulnerable to forced labour and sexual exploitation, often in urban centres.

EAC states are also transit countries for South Asian heroin destined for Europe and North America and there is a significant potential for money-laundering in the regional financial centre.

There may be many impediments to successful prosecutions but GHoA Regional Workshop attendees are now fully aware that focussed, parallel financial investigations can massively disrupt THB networks. It is therefore worth considering how the confiscation regimes in member states can be enhanced by tailored unexplained wealth legislation to hit criminals where it really hurts – in their pockets.

AML-THB REGIONAL PROJECT IN THE GREATER HORN OF AFRICA – SEMESTER PLANNING

Federico Argentino,

Project Coordinator of the AML-THB Project

Based on the comments shared via the pre- and post- surveys by participants of each activity, the overall picture presented is positive and indicates that the project is moving on the right direction.

Background

During 2020, the AML-THB regional project in the greater horn of Africa was of course also affected by COVID pandemic. The whole programme and approach to various activities had to be readapted to the new needs and limits that the pandemic created. Notably, it had to renounce to the implementation of in-person activities, which is core to the approach and philosophy of the AML-THB way of conceiving activities. Important because better facilitating the implication and interaction with and amongst the participants.

The project adapted to this new reality very well by ensuring the implementation of 17 training and awareness raising activities. Globally, a total of 664 participants attended them. Due to the unpredictability of the Pandemic evolution and the risks related to it, the institutional capacity building activities were mainly e-meetings (12) with only a few in-persons (5), mostly implemented in early 2020.

Based on the comments shared via the pre- and post- surveys by participants of each activity, the overall picture presented is positive and indicates that the project is moving on the right direction. A high percentage of the participants consider the training to be of added-value to their knowledge and skills in regard to their daily tasks and duties.

Having defined the right direction and developed a constructive relationship with the institutions of the region, much more has still to be done. The project will have not only to consolidate the dialogue and interaction between the project and institutions, but more importantly will give a particular attention to consolidate dialogue and exchange amongst the institutions both at national and regional level, and help them define forms of agreements and collaboration to better address the common combat against criminals and money launderers.

Planned activities

For the first semester of 2021, the activity planning is very ample, with a large spectrum of technical events. The aims will be to orient the participants on how to reinforce or discover new approaches or strategies in relation to the financial investigations, the trafficking in human beings financial perspective, the analysis of criminal routes or a better understanding of procedures and international standards., In a nutshell, the overall aim of the project is to contribute in strengthening the quality (and successful rate) of investigations, prosecutions and convictions of criminals in relation to Money Laundering cases, Financing of Terrorism and to better understand the connection with criminal businesses such as Human Being Trafficking and Smuggling.

This period foresees a further challenging commitment for the project team in terms of organization and planning of the activity contents, training methodology, organization and implementation of each event. Once again, most of the training and seminars will be online, both for regional and national activities. In the meantime, the project is confident it will be able to continue with the trend initiated last November, with a new round of in-person national activities organized in Kenya and hopes that this will soon be extendable to the other countries in the region involved with the project.

Similarly, the project will continue involving the institutions of some neighboring countries within the Horn of Africa dealing with the same subjects. The decision made last year to extend an invitation of our activities to some of these countries (notably Comoros, Madagascar, Malawi, Mauritius, Mozambique, Seychelles), has been a great success. This proves the need and demand for further interinstitutional level cooperation, both at national and regional/supranational level. This limited interaction/cooperation at the various levels of the criminal investigations is proved not only by the limited number of successful global cases achieved, but also, according to our regional project context, by the high demand coming from the participants regarding further inter-institutional capacitation in order to strengthen synergies, common understanding, and reinforce then joint approaches.

The project will continue ensuring a training methodology based on practical learning and throughout study cases. Concrete and practical exercises will help the participants train their capacity to interact and think from different perspectives.

For this semester, the Project Team indicatively expects to be able to organize around 20 activities, amongst the training and workshops. Particular attention will be given to the financial investigation steps and the institutional interactions such as between LEAs and Judiciary sectors. The objective is to reinforce the nexus between Human Trafficking and Financing Terrorism, special sessions for the Financial Institutes/private sector (Uganda, Sudan and Tanzania), such as those recently implemented in Kenya and Ethiopia; awareness raising for media and Non-State Actors sectors. A detailed indicative calendar activity plan follows below.

Monitoring, evaluation, institutional agreements and feedback

The project considers virtual activities as a fundamental tool for the training and interaction of the participants and their institutions. Nevertheless, it also considers that virtual sessions facilitate less in the project aims of strengthening the interactions and cooperation among participants/institutions at both regional and national levels. Hopefully in a near future, in-person activities will once again become the norm, since participants spend more time together through interaction during training sessions, the session breaks and at the end of each day-session.

Some strategies have been put in place, such multi-Country participant exercises, or direct questions to participants during the training to ensure they can share their personal/national experience; ex-post training and WhatsApp groups, to facilitate the integration/interactions amongst the participants. This will be developed further in the coming months. In regards to this, particular attention will be given to reinforcing the individual training sessions so to further strengthen the interactions amongst participants, as well as their involvement, and guarantee experience sharing from different angles.

Pre- and post- surveys will be further finetuned with the aim of obtaining a clearer picture of the participants before and after each activity. This will provide fundamental elements to analyze on the overall contribution that the

project will have provided to the institutional capacitation in each of the interested countries. Among others, tailored forms of evaluation are under definition, and will be adopted to some specific planned multi-level activities to contribute towards a better picture of the knowledge capacitation.

Another important objective of the project, which will continue to provide a lot of attention, is the hierarchical level of the targeted participant groups to ensure the correct institutional, competences, and homogeneity of experiences amongst the participants.

Finally, the project will have to be attentive to challenge risk of duplication/interference of other implementing agencies. This is an existing issue and, because the project team had the perception that this increased due to the reduced sharing of information among implementing agencies caused by the COVID-19, a higher attention and stronger information sharing approach will be adopted.

To that, the project will continue developing and consolidating its policy of agreements in order to guarantee fruitful and constructive collaborations with other institutions such as national training institutes/academies or regional institutions. MoUs for effective collaboration have already been signed with various entities such as the Kenyan Judiciary Training Institute, other agreements are in the pipeline or under discussion to be finalized with other national or regional institutions.

Lastly, the project website is almost ready and, once active, it will provide the project with an interactive and useful platform for the various institutions involved and/or following the project.

Happy 2021 to you all, glad to be part of this challenging project!

AML-THB in the GHoA – Indicative calendar planning

MONTH	ACTIVITY	SO	NO. OF PAX	STATUS	LOCATION
JAN	Financial Investigation Course - Group I	1	35	National	Kenya
	National training for FIs (private sector) on effective AML measures to disrupt THB/SOM financial flows – UGANDA	1	40	National	Uganda
	Project Monthly Newsletter				
FEB	Counter – Terrorism and establishing the Nexus between Human Trafficking and Terrorism – Judges	1	30	National	Kenya
	Counter – Terrorism and establishing the Nexus between Human Trafficking and Terrorism - Magistrates Group I	1	30	National	Kenya
	Counter – Terrorism and establishing the Nexus between Human Trafficking and Terrorism - Magistrates Group II	1	30	National	Kenya
	Project Monthly Newsletter				
MAR	Regional training on criminal intelligence analysis & mapping of THB/SOM criminal networks	2	35	Regio	Virtual
	Financial Investigation Course - Group II	1	35	National	Kenya
	National training for FIs (private sector) on effective AML measures to disrupt THB/SOM financial flows – TANZANIA	1	40	National	Tanzania
	National training for FIs (private sector) on effective AML measures to disrupt THB/SOM financial flows - KENYA Group II	1	40	National	Kenya
	Project Monthly Newsletter				
APR	Financial investigation: Foundational course - Group I	1	35	Nat/Regio	TBC
	Conference of Inter-governmental organisations in the field of AML	3	40	Regio	TBC
	Project Monthly Newsletter				
MAY	Financial investigation: Foundational course - Group II	1	35	Nat/Regio	TBC
	International Seminar on the effective AML measures against THB/SoM and the role of the private (non-state) sector	3	100	Regio	TBC
	Asset Recovery: Asset tracing, freezing and recovery standards and frameworks	1	35	Nat/Regio	TBC
	Financial Investigation Course - ToT	1	35	National	Kenya
	Project Monthly Newsletter				
JUN	Survey of the effectiveness of MOUs signed on AML/CFT and THB/SoM	3		Regio	TBC
	National training for FIs (private sector) on effective AML measures to disrupt THB/SOM financial flows – SUDAN	1	40	National	Sudan
	International Seminar on International best practices in investigating and prosecuting THB/SoM using financial flow tracking techniques and financial intelligence	3	250	Intl	TBC
	Meeting of Heads of FIUs	3	10	Regio	TBC
	Project Monthly Newsletter				



Welcome Remarks by Ms. Lilian William Kafiti President ARIN-EA-PCCB, Tanzania During the Online Regional Webinar on FATF's Assessment of Effectiveness

14th December, 2020

In each Member State there are three key representation, one, from an Anti-Corruption Agency, and, two, from any of the following elements; Prosecutorial/ Judicial/ Law enforcement/ Financial Intelligence Authority and Asset Recovery/Forfeiture Authority.

Mr. Frederic Bayard, Project Director

Mr. Tuemay Aregawi, Senior Technical Advisor TEAM AML-THB

Facilitators, distinguished participants, ladies and gentlemen.

Good morning,

On behalf of the ARIN-EA family, I would like to take this opportunity to thank the organisers, in particular Mr. Tuemay Aregawi and the entire team of AML-THB Project, for your kind invitation to participate this morning and to say a few words on behalf of ARIN-EA. It is a great honour for us. We thank you very much.

Ladies and gentlemen,

Before I proceed further, allow me to briefly explain who we are. ARIN-EA stands for Asset Recovery Inter-Agency Network for Eastern Africa. It comprises eight (8) countries namely Burundi, Djibouti, Ethiopia, Kenya, Rwanda, South Sudan, Tanzania and Uganda, in an informal network that was established by the Heads of EAAACA in 2013 with the support of the StAR Initiative/World Bank. Our aim is to promote the informal exchange of information on individuals, assets and companies at the regional and international level so as to facilitate the effective tracing and recovery of proceeds of crime, ultimately depriving criminals of their illicit gains.

In each Member State there are three key representation, one, from an Anti-Corruption Agency, and, two, from any of the following elements; Prosecutorial/ Judicial/ Law enforcement/ Financial Intelligence Authority and Asset Recovery/Forfeiture Authority. At ARIN-EA, we recognize the need to promote cooperation at the regional and international level to effectively track or trace and recover stolen assets within and beyond the territorial boundaries of Eastern Africa, in collaboration with relevant partners. The network receives support from EAAACA, GIZ in carrying out its activities. It works with various partners such as STAR (UNODC-World Bank, CARIN, ARIN- AP, ARINSA, INTERPOL, RIRAG, ARIN-WA, and ICAR.

Since its establishment, ARIN-EA has registered a number of achievements, in particular, developed a 5-year Strategic Plan of 2019–2024 and provided information to one another and to jurisdictions outside the region while carrying out investigations, training and building capacity of key persons and other staff within ARIN-EA Members Institutions in various fields. These include financial investigations and asset recovery, crypto currency. We have developed a mutual legal assistance guideline for ARIN-EA member countries and secure information exchange portal and a website containing information on asset tracing and recovery.

I am happy to learn that by the end of this webinar, the team will have started to establish an informal network to allow us understand and trust each other, share information and learn from each other. I hope that, as a group, where appropriate, we can collaborate with ARIN-EA to achieve this intended goal because I believe there is a lot that we can learn from each other and share best practices as we face many challenges in the area of asset recovery in the region and beyond.

Despite these challenging times of the global Covid-19 pandemic, the AML-THB team has never stopped working to ensure the entire Greater Horn of Africa is a safer place from crimes such as human trafficking, money laundering and corruption, just to name a few. This webinar is a testament to the hard work and a reflection of the commitment that the team has put in the fight against money laundering and trafficking of human being. We are all here to witness the work done through the Regional Webinar on FATF Standards on Effectiveness. We thank the AML-THB for these efforts.

As you all know, the Mutual Evaluation Reports done by Eastern and Southern Africa Anti-money Laundering Group (ESAAMLG) on the effectiveness of AML-CFT assessments by its member countries has stated that no nation has scored either substantial or a high level of effectiveness in any of the 11 FATF Immediate Outcomes.

Among the key areas that were identified, the reports specifically mentioned lack of STRs reporting, investigation, prosecution and conviction of ML-TF cases, and the lack of asset recovery. Human trafficking was also listed as a high-profile predicate offence. This clearly tells us that we have a lot to do on what, how and where to improve in achieving the desired outcomes to meet FATF Standards.

Ladies and Gentlemen

While appreciating your efforts in the fight against organised crime in terms of strengthening the legislation, institutional and operational capacity, we need to ask ourselves what controls can we employ to stop the human trafficking cartels? How is it possible for people to be illegally transported from one point to another? Are the people at the borders or other exit, entrance points not doing their job effectively? Is it not corruption that fertilizes or fuels human trafficking?

I believe this webinar offers us another opportunity to work towards finding the answers and address the gaps that were identified in the MER reports, where appropriate. We gather today for this webinar from different cultures, traditions and backgrounds, but as soldiers in the front line, speaking the same language. As the day progresses, you will be able to share best practices/experiences and challenges, develop ideas and formulate strategies that will assist in implementing the immediate outcomes stipulated in the FATF methodology that contributes to the effectiveness of national systems, of which I believe, asset recovery is part of.

Ladies and Gentlemen

As a practitioner, I recognize the challenges faced in tackling cross border issues, including corruption, human trafficking and money laundering. I know it is a challenge but we should not lose focus and get tired because we are entrusted by our respective countries and given the opportunity to serve our people. Our efforts are for our nations and therefore, it is important for all of us here to take firm action to deny criminals the luxury of enjoying the unlawful fruits of their criminal conduct.

Criminals are hurt even more when you deprive them of their assets in addition to sending them to prison. We therefore must make concerted efforts and commitment to ensure they suffer heavily. Our role is to collectively come together and start filling gaps identified in the MERs to effectively prevent and combat organised crime in the region and beyond, before criminals increase their appetite to continue engaging in unlawful activities. If we fail in our job the criminals will definitely unite in their efforts to preserve their status quo. We therefore have an obligation to ensure asset recovery is our priority number one in the region and beyond.

Finally, I wish everyone a successful and fruitful discussion over the coming three days. We look forward to further exploring possible ways of working together and collaborating in the area of asset recovery.

Thank you very much.



Miss. Lilian William Kafiti

President-Asset Recovery Inter-Agency Network for Eastern Africa

Senior Investigator/Prosecutor-Prevention and Combating of Corruption Bureau-Tanzania

Certified Trainer on Financial Investigations and Asset Recovery-International Centre for Asset Recovery, Basel Institute on Governance.



Financial intelligence a powerful tool in successful prosecution of organised crime

Neil Bennett

My own experience, leading complex financial investigations on terrorist groups, terrorists and extremists over a period of two decades, leaves me in no doubt that financial intelligence and financial evidence is an extremely powerful tool.

It cannot be gainsaid that Trafficking in Human Beings (THB) is a dreadful and abhorrent crime. One that is predicated on the motive for profit by one human being exploiting another. This so-called trade is conducted by organised crime gangs that have recognised that THB (and Smuggling of Migrants) is a high profit, low risk endeavor currently. The application of every appropriate investigative tool should be an obligation, not a choice. Any successful approach focused on the identification and prosecution of organised crime groups, as well as their supporters and networks requires a multi-faceted investigation strategy. A key strand of that strategy needs to focus on the identification and acquisition of financial intelligence, financial information and in due course, financial evidence. Quite simply, FATF determines that a 'financial investigation means an enquiry into the financial affairs related to criminal conduct'.

My own experience, leading complex financial investigations on terrorist groups, terrorists and extremists over a period of two decades, leaves me in no doubt that financial intelligence and financial evidence is an extremely powerful tool. Its application by professional investigators, prosecutors and other relevant agencies should be a cornerstone of every proactive or reactive investigation into criminal conduct. There are many excellent commentators who have already contributed to that philosophy in previous newsletters. Equally, an effective financial investigation needs to be underpinned by an effective training and the development of a national curriculum that reflects the needs and requirements of all stakeholders in the process, particularly the partnership between investigators and prosecutors.

From a personal perspective I am pleased to have been associated with the previous EU 'Anti-Money Laundering and Countering the Financing of Terrorism in the Greater Horn of Africa Region' (AML-CFT in the GHoA) which concluded in 2019 prior to the inception of this project, 'Disrupting Criminal Trafficking and Smuggling networks through increased 'Anti-Money Laundering and Financial Investigation capacity in the Greater Horn of Africa' (AML-THB in the GHoA).

There are several features of both the AML-CFT and AML-THB projects which I believe are unique and for which the key elements of style, method and content of delivery has benefited from a significant element of continuity from one project to the next. Those facets are not the data driven metrics of perceived achievements, but rather a recognition that organisational change is also dependent on recognising the benefits of, a collective understanding, a positive learning culture, as well as a focus on sharing - both information and experience in equal measure. A focus on these elements, going beyond the numbers, has and is a strength of the AML-THB project to deliver a more informed and dynamic response.

As a regional project, one of the key challenges is to blend and adjust delivery to meet the subtle differences across the GHoA in domestic culture, legal frameworks, processes and indeed how the crime manifests itself in any particular jurisdiction across the region. The basis for any common or regional approach has to be a shared understanding, not just in terms of the activities and nuances of the behaviours of organised crime groups but also of our ability to effectively apply our capabilities to deal with criminal activity. Understanding is defined as: the perception and interpretation of a particular situation in order to provide the context, insight and foresight required for effective decision-making.¹ Understanding helps us to make decisions; it also helps us to manage any associated risks and any subsequent effects. As such, part of any project needs to recognise that we need to build and support the pathway from individual to collective to common understanding.

The goal is to achieve a common understanding when countries, institutions, professions, communities and other groups cooperate for a purpose, in this case to counter THB. Undoubtedly, different groups may have different kinds of collective understanding that involves potentially divergent interpretations of the problem and how to address it. Prior to the inception event of the AML-THB in the GHoA in November 2019 the project team coordinated a series of project pre-kick off meetings at Kenya School of Monetary Studies (KSMS) in Nairobi. A group of participants from diverse professions, representing each jurisdiction covered by the project, came together to build an initial 'understanding' across the project's

three specific objectives. I was proud to be involved in this process, not least to work with a group of professionals focused on developing a detailed response towards an understanding of how project specific objectives should be visualised and delivered. Importantly, the process also identified several overlapping strands that, if focused upon, would deliver benefit across the whole of the project as core themes. That collective work was then presented by different national representatives to senior representatives from Kenya, the European Union and CiviPol.

The project has, as part of its central core, a proactive approach to encouraging and easing the sharing of information. The process of 'understanding' depends on access to information and knowledge, but access is often problematic, particularly so in a regional project focused on a transnational criminal enterprise. Networking is important to generate understanding and offers significant benefits including the potential for greater objectivity, burden sharing and innovation. Networking also serves to build trust and helps us identify common risks. Successful networks combine the knowledge and experience of those that contribute and help to establish and maintain personal relationships. As part of the structure of the project, the aim has been to support the development of networks both naturally and through a deliberate process. A key driver of this project has been the mantra to keep fostering stronger partnerships, or if you like, 'relationships, relationships, relationships'.

The training delivery that I and colleagues have supported is very much influenced by reflective learning. Reflection in a trusted environment is an opportunity to use a framework for examining experiences and using such as the basis to understand specific areas which may require improvement - getting 'just a little bit better'. This approach to learning is firmly situated in a 'reflective cycle' to give structure to learning from experiences. Given its cyclic nature, it lends itself particularly well to repeated experiences, allowing learning from things that either went well or didn't go well. Knowledge and skills are critically important, but as part of that process facilitating an opportunity for participants and groups to evaluate, analyse and form action plans to deal with similar situations in the future, or general changes that might be appropriate. Reflection is part of a learning cycle where others are drawn into the learning process giving meaning to experience. This approach embeds and encourages a learning culture, which includes the encouragement for participants to learn and reflect on their work, proactively influence strategy and process change. From the perspective of my own involvement and that of colleagues, it is clear that the AML-THB project has adapted to the challenges presented by the current pandemic to maintain momentum, engagement and deliver high quality events.

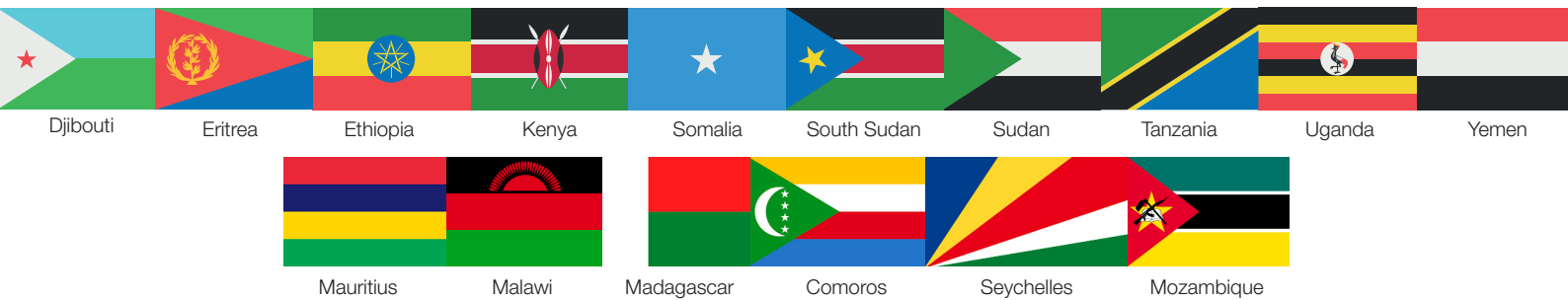
About Neil Bennett

Bennet's law enforcement career focused almost entirely in Counter Terrorism work at New Scotland Yard in London. He performed a wide variety of operational roles including; Investigator, Operations Coordinator, Covert Techniques, Intelligence Manager and Financial Investigation Manager.

He joined the National Terrorist Financial Investigation Unit (NTFIU) in 2002 and was responsible for; management of operations, public/private partnership initiatives and liaison with UK Intelligence community. As the national lead for UK Terrorist Finance training, he designed the UK's first fully accredited terrorist finance course and led, on behalf of the Foreign and Commonwealth Office, overseas CFT capacity building. He trained as an international evaluator on behalf of Financial Action Task Force (FATF). He was seconded to UK Ministry of Defence to establish a cross government capability to deliver strategic effects. He was responsible for policy, strategy, operations and training in the development and use of 'Threat Finance' interventions in support of UK overseas priorities. He has since designed, prepared, delivered and evaluated financial investigation training and capacity building on behalf of United Kingdom Government, European Union and others in a large number of jurisdictions.

He is a Community Governor at a large secondary school in SE England with responsibility for the strategic overview of Teaching and Learning as well as reviewing and monitoring the quality of education.

¹ Concise Oxford English Dictionary



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