



EUTF FOR AFRICA

Horn of Africa region

DISRUPTING CRIMINAL TRAFFICKING AND SMUGGLING NETWORKS THROUGH
INCREASED ANTI-MONEY LAUNDERING AND FINANCIAL INVESTIGATION
CAPACITY IN THE GREATER HORN OF AFRICA (AML/THB GHoA)

THE PROJECT AT A GLANCE

Countries in the Greater Horn and Southern Africa region face multiple serious criminal threats, including transnational organised crime and terrorism. These criminal threats compromise the stability, development and governance in the region and in each member state.

Most countries in this region have limited capacity in investigative skills and analysis, which needs strengthening in order to trace the significant flow of money generated by these crimes. Research has also shown a lack of understanding of the damage caused by this type of crimes, and the link it has to other forms of organised crime, such as terrorism.

The growing nexus between **transnational organised crime** and terrorism, the capacity gaps in member states and limited institutional cross-border cooperation among countries further complicate the prevalence and impact of the criminal threats and illicit financial flows.

To address this threat, the European Union launched a project to, *"Disrupt criminal trafficking and smuggling*

networks through increased Anti-Money Laundering and financial investigation capacity in the Greater Horn of Africa".

This project is now known as **AML-THB Project**. Over the last three years, the project has worked with countries within its scope, to support their efforts to contain these criminal threats. The project set out with three main objectives: to strengthen national capacity in anti-money laundering and countering illicit financial flows; to increase understanding of the modus operandi of Trafficking in Human Beings and Smuggling of Migrants criminal networks and their illicit financial flows; and finally, to enhance coordination of agencies in this fight, first within a country and ultimately, within regions and across the continent.

This document highlights our **key successes** in achieving these objectives that we set for ourselves when we started. It also includes successes that went beyond our initial imagination and exceeded our expectations. Finally, it charts the way we intend to move forward and how we plan to build on the solid foundation built by this AML-THB Project.

PROJECT OVERVIEW



It is always a delicate exercise to summarise in a few sentences the existence of a project, especially when it has experienced moments of great intensity, in joy and in pain!

It is even more difficult to transcribe these emotions, the moments of both pleasure and despondency, that inevitably mark this often-torturous path.

What I would however like to emphasise is that at first glance, our project tools and design look like any other. But when you take a closer look, you see that it emphasises work and **collaboration** between individuals, and between teams.

Moreover, our way of working is intended to contribute to the making and maintaining good relations, so that participants and experts, trainees and trainers, are happy to continuously work together on emerging issues related to the fight against illicit financial flows and the **Transnational Organised Crime (TOC)**.

It is not easy to achieve this, but who would not want such cohesion?

So, when we took over from our predecessor, the “AML-CFT project”, which was launched in 2015, we looked for the best possible approach to add value to the fight against money laundering and terrorism financing and the fight against illicit financial flows generated by **Trafficking in Human Beings**.

We started with a simple idea: to strengthen and boost the existing institutional capacity to monitor, investigate, prosecute, judge and confiscate dishonestly acquired financial, physical or virtual assets.

The construction of this mechanism became obvious and led us to focus our training on the tactical and analytical power of the Financial Intelligence Units, (FIUs); and to replicate our gains to other stakeholders.

At the same time – since we believe that the synergy of actions is the key to the success of this approach - we set out to create a culture of **financial intelligence** sharing, through creation of partnerships with the private financial sector, bringing the various players closer together and more involved.

From here, in partnership with Kenya’s Financial Reporting Centre, we designed a public-private approach to train and equip the financial sector with tools necessary for them to combat money laundering. We trained over 3,000 participants across Kenya and today, this model is available for replication to all our partners in the upcoming project.

Throughout the last 3 years, we have gained new partners and made good progress in offering specialised support to FIUs. We have also developed training curricula, which is essential for the sustainability of this project over time.

We have also enriched our catalogue of training courses, incorporating training in **cryptocurrency** and in seizure of **virtual assets**, which are all new subjects that require not only talent and ingenuity, but also a significant personal investment at the outset.

Our network of researchers has continued to grow, and it is a real pleasure to see them evolve positively for the benefit of the fight against money laundering and terrorist financing in the region.

On many occasions, I have been able to measure the interest that our institution generates, and I know that all the credit goes to each of you, facilitators, experts, participants.

I am proud to be at the head of this project and this team, and that this pride has persisted throughout the 3 years with the same fervour.

AML-THB Project Team Director

Key objectives

The AML-THB Project set out to achieve these three Specific Objectives (SO):

- To Increase national capacity in AML and in countering illicit financial flows;
- To Increase awareness and understanding of the modus operandi of traffickers, smugglers and perpetrators of crime against migrants with regards to financing of operations and destination of illicit financial flows;
- To Improve coordination between national agencies in the region, including national jurisdictions and better inclusion in international networks and best practices.

Project Team

Project Management Team

- ✓ 1 Project Director - Frédéric Bayard
- ✓ 1 Project Manager - Federico Argentino
- ✓ 2 Senior Technical Advisors - Alma Wanyama
- Tuemay Aregawi Desta
- ✓ 2 Project Assistants - Faith Analo
- Ruth Watetu
- ✓ 1 Senior Accountant - John Mutie
- ✓ 1 Logistic Assistant - Richard Njoroge

Short Term Specialized Experts

- ✓ Regional 24
- ✓ International 13

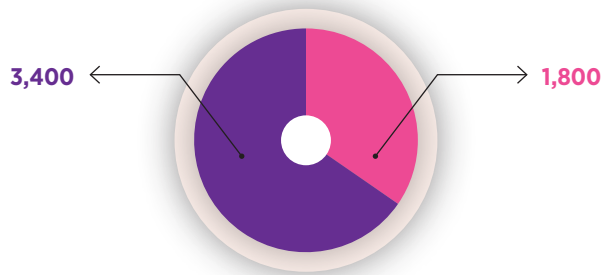
Participating Institutions

- ✓ Law Enforcement Agencies
- ✓ Financial Intelligence units
- ✓ Banking and Financial Sector
- ✓ Immigration Departments
- ✓ Asset Recovery Agencies
- ✓ Anti-Terrorism Units
- ✓ Prosecutors & Judges
- ✓ Customs
- ✓ NGOs & Private Sector



Facts and figures

A breakdown of activities to achieve the specific key objectives



No of people trained: 5200

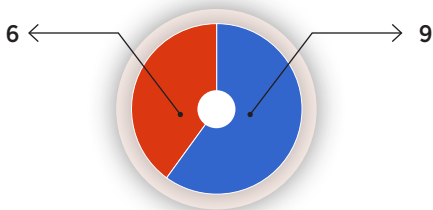
Male participants: 3400

Female participants: 1800

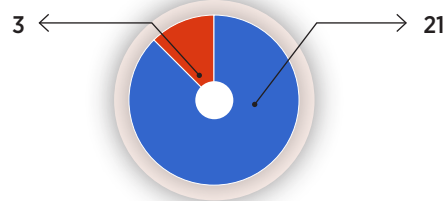
Implemented Activities

Under Specific Objective 1 (SO1)

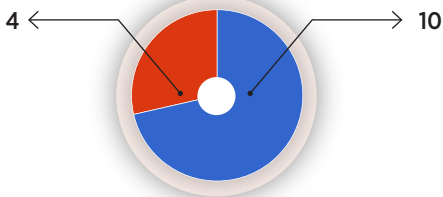
A: National training workshops for LEA



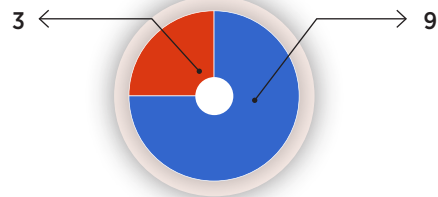
B: National Training Workshops for financial institutions - Kenya, Sudan, Uganda, (Ethiopia)



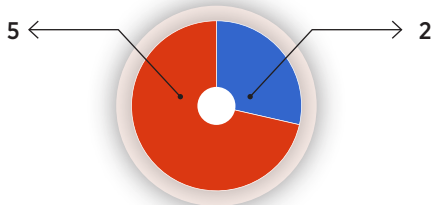
C: National Training Workshops for FIU - Kenya, Uganda, Yemen



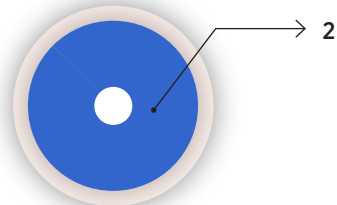
D: National Training Workshops for judiciary authorities



E: National Training Workshops for asset recovery agencies



F: Technical assistance to the government of South-Sudan



N° of National activities N° of Regional activities

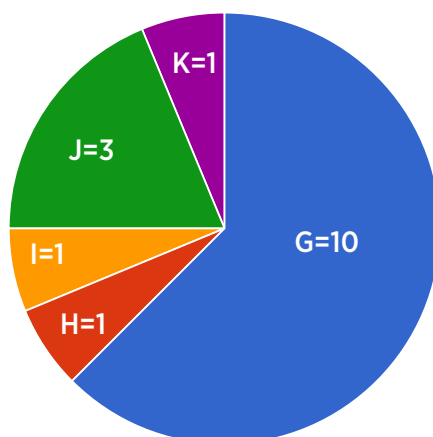
Implemented Activities

Under Specific Objective 2 (SO2)

G: International Seminar for LEA and FIU

I: International Seminar on THB/SoM's intelligence sources

K: Training Workshops about field research and evidence-analyse based analysis on THB/SoM



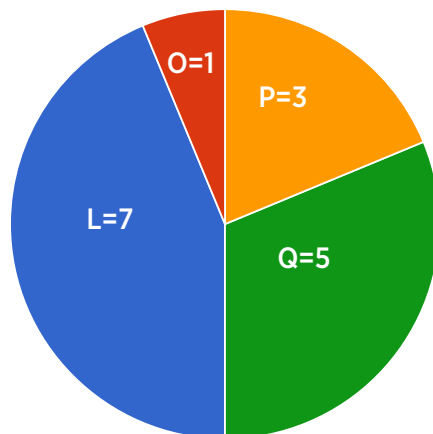
H: International Seminar on Hawala's mechanisms

J: Training Workshops for private sector and financial services

Implemented Activities

Under Specific Objective 3 (SO3)

- L**: International Seminar on information exchange
- M**: International Study Tours
- No Activity
- N**: International Seminar on AML/HB/SoM for private stakeholders
- No Activity
- O**: Conferences for Intergovernmental Organisations in the field of AML

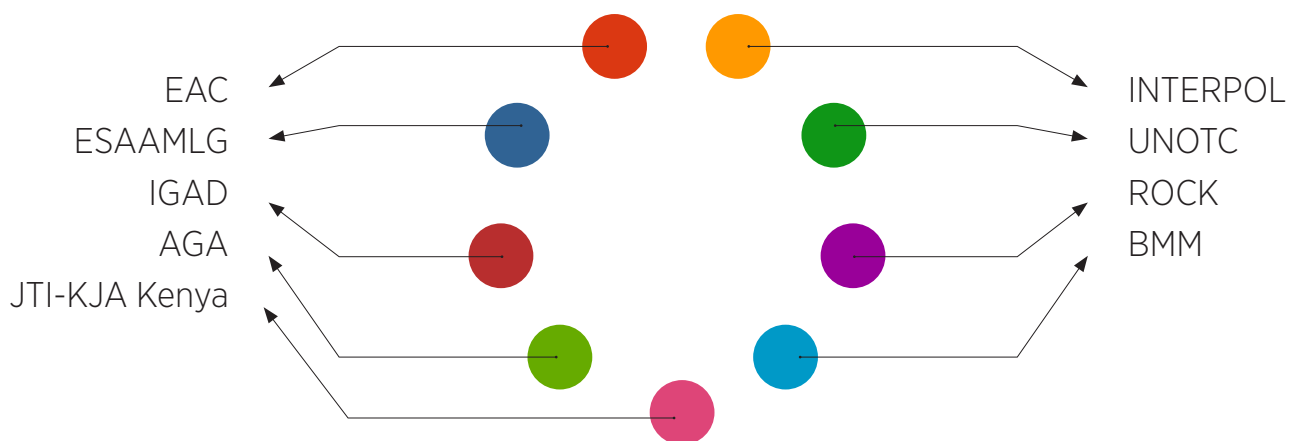


- P**: Semester Meetings of the Heads of Immigration Services
2 joint meetings with HoFIUs
- Q**: Semester Meetings of the Heads of FIUs
2 joint meetings with HoIMMs

Total Number Of Activities Planned: 104

1. Implemented To Date (27-04-2022)	96
2. Postponed and Planned	8
3. Cancelled	5

Agreements Signed by the Project With Relevant Institutions in the GHOA - 9



Important Facilitated Actions

1 Guidelines on cooperation and collaboration in the investigation and prosecution of terrorism cases	Kenya	In cooperation with ODPP-KE	
1 Training of financial institutions across Kenya on strengthening their AML/CFT measures in detecting and disrupting criminal networks	Kenya	In cooperation with FRC-KE	With OVER 3,000 BANKERS & DNFBPs TRAINED
1 Benchmarking mission of FIU South Sudan to Kenya	South Sudan	In cooperation with FRC-KE	
2 Two level special training support to Yemen FIU and Central Bank officials on AML/CFT	Virtual & Egypt		26
1 One regional training of trainers regional cycle on AML/CFT	Virtual & in Person		27
1 One regional training of trainers financial investigation curriculum	Virtual & in Person		
1 Five special support training to Uganda	Virtual & Uganda		

PROJECT HIGHLIGHTS



Q The AML-THB project is almost coming to an end after running for 3 years. Do you feel that the project has been a success?

A Definitely. We've had a good run, albeit with some challenges, especially due to the covid-19 pandemic, which broke out one year into the project.

We set out to build capacities of local agencies charged with fighting money laundering and with conducting **financial investigations** to detect suspicious transactions and terrorism financing. Today, we stand with an outcome that has far surpassed our initial goal and objective! We have created tangible results, not just in **training** and capacity building within agencies but going beyond this and, to name one example, developing a training curriculum in financial investigations. This curriculum will provide sustainability and continuity in training on financial investigations within institutions, well beyond the life of this project.

The Training of Trainers (ToT) is another example of work we have done to preserve the continuity of our effort. We have trained trainers from law enforcement agencies, immigration services, the judiciary, among others. These trained officials will in turn train their peers within their units and broader institutions. Eventually, this will create a critical mass within state agencies, of awareness and knowledge of the modus operandi of criminals involved in trafficking of human beings, money laundering, **smuggling of migrants** and terrorism financing. It will also make readily available the knowledge of how to disrupt these criminal networks and successfully prosecute the offenders.

Q What other major wins has the project achieved?

A The most foundational achievement has been to bring together and to create a common platform for officials drawn from different agencies and institutions from the Horn and southern Africa regions. By meeting and engaging with each other during our training and workshops, the various agencies have created networks and found the opportunity to communicate and create rapport with each other, even informally.

We started out with just the countries in the Greater of Horn

of Africa. But the success of our work and collaborations in these countries gave the confidence to include other countries from southern Africa region. Today, we are in 16 countries including **Kenya, our host; Uganda, Ethiopia, Yemen, Sudan, South Sudan, Eritrea, Djibouti, Somalia, Tanzania, Malawi, Mozambique, Madagascar, Mauritius, Comoros and Seychelles**. This is seven countries beyond our initial scope!

Another major win is our collaboration with the Judiciary Training Institute – now known as the Kenya Judiciary Academy. We partnered with them to train judges and magistrates, especially those who preside over trafficking of human beings, terrorism and financing of terrorism cases.

We also supported, technically and financially, in collaboration with Kenya's Office of the Director of Public Prosecutions (ODPP), the development of Inter-agency Guidelines in cooperation and collaboration in investigation and prosecution of terrorism and terrorism financing cases. Just recently published, these Guidelines will not only be used in Kenya but will also be used as a standard for replicating the same in other countries in the region.

Q What next after May when the AML-THB Project comes to an end?

A The end of this project will mark the beginning of another!

Our hope is to build further on the already established gains. We are planning a bridging phase, in which, with easing of covid-19 restrictions across borders, we will be able to do more in person training in all the countries we have partnered with. We will begin by doing needs analysis in each country, and then tailor our training or intervention on a needs-basis for individual institutions and countries. We will focus on transnational organised crime, as we know that most cross border organised crimes, including money laundering, trafficking of human beings, and smuggling of migrants, are often interlinked and championed by the same criminal networks.

We are all looking forward to the next phase of this project!

Q&A With AML-THB Project Technical Team

LOOKING FORWARD



While we are coming to the end of this project, we are also looking forward to what is next. Over the last three years, we have had to adapt to unexpected contexts, respond with new measures and take on flexible attitudes. By doing this, we have maintained a good direction and achieved our identified objectives and desired result.

Cooperation, Coordination, and **Sustainability**, this was the rallying call of our actions to develop institutional capacity in the region.

We achieved a lot but there is still a lot more to be done to strengthen our partner institutions regarding these sensitive, yet important threats to our daily lives: money laundering, trafficking of human beings, terrorism and the financing of terrorism.

To move on from here, we deem it important to follow the light of these three important pillars.

In this regard and based on the built experience, we will continue focusing our energy to building collaboration with national training institutions. This will help in supporting national authorities to reinforce their internal capacity to better train staff on **AML/CFT**, to develop solid and tailored curricula, to build stronger synergies among peer institutions, especially in financial investigations.

Our very constructive partnership with the Office of the Director of Public Prosecutions – Kenya, in the development of Inter-agency Guidelines in cooperation and collaboration in investigation and prosecution of terrorism and terrorism financing cases, demonstrates the importance that national authorities are giving to the need for stronger and efficient forms of institutional dialogue. This shows the relevance for new constructive ways of joint strategies and actions against illicit trafficking and criminal networks, being

strengthen and interconnected, also at the international level.

We hope that this achievement will inspire other countries in the region with whom we hope to continue this constructive work in the near future.

In the **global economy**, criminals adopt their ways to respond to new financial systems. In the same way, criminals work within networks on the regional level, transacting across borders. This therefore requires greater attention. A stronger common understanding should be developed. Furthermore, joint strategies and synergies against illicit trafficking and related financial flows should be sustained and adopted. The **multi-agency approach** to fight these crimes should have a national perspective but at the same time, be designed within a regional spectrum.

Finally, it will be important to reinforce dialogue and communication between the national institutions and the private sector; profit and no-profit. Once again, over the duration of this project, we have shown how the private sector can become susceptible to manipulation by criminals. But we have also shown how, if supported and included in the common fight, can be a fundamental and strong ally for national institutions in combatting illicit financial flows.

Based on the forms of **collaboration** developed over the last three years, we know that with tailored and well-coordinated support actions, avoiding overlapping and duplication of effort, the International Community has an important role to play to contribute to a faster and efficient improvement of National capacities in the **AML/CFT** sector in the region.

This is what we are looking forward to!

AML-THB Project Manager

Transnational Organised Crime



CONTACTS

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