



**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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## A WORD FROM THE PROJECT DIRECTOR



In the last newsletter I announced some thematic series to come and this time we start with anticipation articles on financial crimes initiated during the Covid-19. That was a little bit general, but it was necessary for new participants and perhaps for those who were unable to attend the kick-off conference last November: 6 months already!

Time flies for professional activities, but seems to have slowed down incredibly in recent weeks. This allowed us to adapt and continue to communicate with all of you, either through this newsletter, or by other means which will very quickly be implemented by the project operational team. I hope all is well for your institutions and services and I wish you all the best for the management of this crisis which will last a little longer, unfortunately. We devote all our energy in this context to prepare this transition phase as well as possible, but of course, we do not lose sight of the objectives a little further away, when calm is restored and it is time to repair the damage caused by the pandemic, be it human but also social and economic, because at the same time, crime adapts and takes advantage of the misfortune that strikes us all. But we will all be able to rise to the challenge, each contributing his stone to the edifice of the common good.

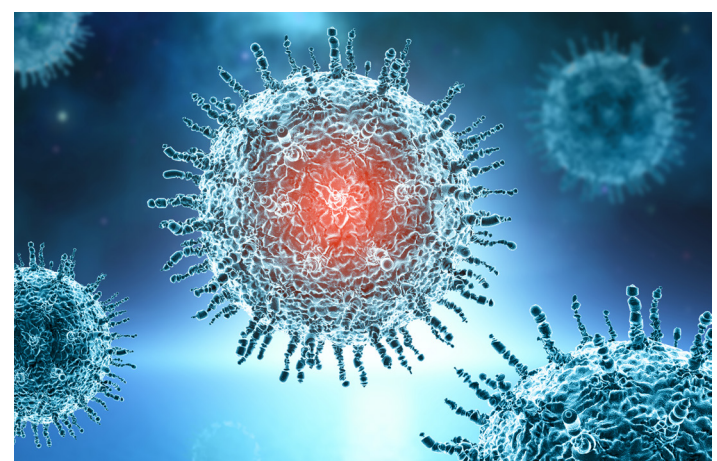


*Frédéric Bayard  
Project Director*

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Emerging Crime Threats of COVID-19 Pandemic in the Greater Horn of Africa



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## 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/TBH)

**H**uman trafficking and migrant smuggling are now one of the most profitable proceeds-generating crimes in the Greater Horn of Africa region: An Ethiopian migrant moving to Yemen via Somalia may pay up to US\$ 1,540 for the journey to smugglers, while maritime crossings from Somalia to Yemen reportedly cost up to US\$ 2504. Given the number of people that cross these migration routes every year, the benefits generated by these criminal activities are high.

Despite recent progress in the area, most countries in the Greater Horn of Africa (Djibouti, Eritrea, Ethiopia, Kenya, Somalia, South Sudan, Sudan, Tanzania, Uganda and Yemen) still have low investigative capacity and skills 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 crime, and the link it has to other forms of organised crime, such as terrorism.

Knowledge on vulnerabilities of financial institutions and possible preventive measures, as well as lack of trust among stakeholders and countries, need to be addressed. "Disrupting criminal trafficking and smuggling networks through increased anti-money laundering and financial investigation capacity in the Greater Horn of Africa" (AML/THB) is a regional programme, funded by the Emergency Trust Fund for Africa (EUTF) that aims to address these challenges. The aim of this programme is to improve the investigation methods used against cross-border criminal organizations that profit from irregular migration, human trafficking and other types of organized crime and hence contribute to disrupt these criminal activities.

#### KEY OBJECTIVES AND ACTIVITIES

##### **Increased national capacity in anti-money laundering and countering illicit financial flows.**

The training of law enforcement agencies, financial institutions, and Financial Intelligence Units (FIU) and judiciary authorities does not only aim to improve their capacity throughout the different phases of investigations but also boost their cooperation.

##### **Examples of activities:**

- Support law enforcement agencies in skills development to initiate investigations after receiving information from a financial institution;
- Enable financial institutions to better cooperate and reply to requests from law enforcement agencies under relevant legal procedures;
- Train FIU to better analyse information to identify persons of interest / suspicious activity / patterns and networks.

The main beneficiaries of this programme are financial intelligence units, law enforcement and border management agencies, judiciary authorities, as well as financial institutions of the participating countries. The programme will support the development of national and regional anti-money laundering techniques, including tracing and seizing assets and criminal proceeds, as well as on crime investigation and prosecution. This will be done by supporting the analytical and operational capacity in financial investigation and anti-money laundering techniques of national and regional bodies, and increase coordination and collaboration between



Horn of Africa: © PHOTO; POOL

national services and countries in the region.

**Increased awareness and understanding of the modus operandi of criminal networks regarding the use of financing of operations and destination of illicit financial flows**

The programme will support research, analysis and evidence-based intelligence in this field, as well as raise awareness of the human and financial losses of human trafficking and smuggling, and their link to other forms of crime, such as terrorism.

**Examples of activities:**

- Increase awareness amongst the private sector and financial services of its exposure to and ability to disrupt the financing of human trafficking;
- Raise awareness among financial institutions and designated non-financial business or professions on how human trafficking networks may support terrorist organisations.

**Improved coordination between national agencies in the region, and better inclusion into the international networks and best practices.**

Due to the transnational nature of these crimes, regional cooperation is key. The programme will hence facilitate exchange of information and best practices between countries and with other relevant networks and regional bodies.

**Examples of activities:**

- Regional workshops to increase operational and information exchange, bringing together FIUs, law enforcement and judicial officials, as well as non-state actors, notably CSOs and the private sector, where relevant;
- International study visits and exchange programmes with European, Asian and the Middle East countries/institutions;
- Establish cooperation networks, including with the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), Interpol, the African Union, the Intergovernmental Authority on Development (IGAD).

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**Countries:** **EUR 5 million**

Djibouti  
Eritrea  
Ethiopia  
Kenya  
Somalia  
South Sudan  
Sudan  
Tanzania  
Uganda  
Yemen

**Implementing partner:**

**CIVIL POL**  
C O N S E I L

**Duration: 36 months**



## COMPLEMENTARITY WITH OTHER ACTIONS IN THE REGION

This programme builds on the achievements and lessons learned from the ongoing “Anti-Money Laundering/Countering the Financing of Terrorism in the Greater Horn of Africa” (AML CFT) project, which was funded by the EU’s Instrument contributing to Stability and Peace (IcSP, EUR 6 million).

The programme will also, when appropriate, build synergies by, for example, developing joint-activities and trainings with: [Better Migration Management \(BMM\)](#); [Regional Operational Centre in support of the Khartoum Process and AU-Horn of Africa Initiative \(ROCK\)](#); [EAC joint response to regional and cross border security threats](#); Countering the Financing of terrorism, Anti money laundering – Worldwide (AML/CFT Global); Countering the Finance of terrorism, Anti money laundering-MENA programme; and the Danish Strengthening Ethiopia’s capacity to counter money laundering and illicit financial flows programme.

More information can be found in the project action document: [ec.europa.eu/trustfundforafrica/region/hornofafrica/regional/disrupting-criminal-trafficking-and-smuggling-networks-through-increased-ennt](https://ec.europa.eu/trustfundforafrica/region/hornofafrica/regional/disrupting-criminal-trafficking-and-smuggling-networks-through-increased-ennt)



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# EMERGING CRIME THREATS OF COVID-19 PANDEMIC IN THE GREATER HORN OF AFRICA

17 April 2020

By *Tuemay Aregawi*

*The author is a Technical Advisor to the AML-THB Project. He was the Head of Transnational Organised Crime Pillar of IGAD Security Sector Programme.*

The Novel Coronavirus (COVID-19) pandemic has caused tremendous challenge to the globe in just less than four months. COVID-19 has tested the capabilities and infrastructure of the wealthiest and powerful nations. It is considered as the greatest threat posed to mankind since World War II (WWII) instigating global public health crisis, economic recession and security challenges. Though it is overlooked to some extent by states because of the overwhelming influence of the pandemic, COVID-19 has posed and will continue to trigger critical security and criminal risks to societies and states. If the disease strikes the poor and conflict-ridden African countries, the consequence is expected to be disastrous in all forms. Global law enforcement agencies (LEAs) such as [INTERPOL](#) (continuous alert), [EUROPOL](#), Financial Action Task Force ([FATF](#)), the World Customs Organization ([WCO](#)) and number of [thinktank](#) and other [institutions](#) have warned nations and concerned actors about the growing COVID-19 related criminal threats and risks.

## 1. Introduction

The pandemic is likely to affect organized crime. Some crimes like migrant smuggling are likely to decrease because of the risk of the pandemic, closure of borders to human movement and limitation on free movement of people at local level. Other crimes are likely to increase in line with the opportunities the pandemic has brought and emerging and evolving vulnerabilities of societies. Crimes that are likely to intensify are cyber-related crimes, supply of counterfeit and substandard goods, financial fraud, smuggling of goods, corruption and the subsequent laundering of proceeds of crime. Human trafficking (domestic) and forms of exploitation (sexual, domestic servitude, labor) might possibly exacerbate as a result of school closing and job loses, but requires more assessment and will not be discussed in this brief paper.

Criminals can take advantage of the COVID-19 pandemic preying on the shifting focus of state resources notably the law enforcement to contain the disease, weakened institutions, public fear, shortage of supplies, soaring prices of mandatory commodities and personal protection equipment and false information. This paper is a result of review of reports, alerts or policy briefs from global sources, information gathered from regional experts, media monitoring and assessment and analysis of state vulnerabilities and capabilities. The paper intends to provide an overview of the emerging and evolving COVID-19 related criminal threats and the impact on money laundering and suggest potential responses that can be considered by concerned state and non-state actors. This paper is of a general nature and specific reviews and assessments will be considered in upcoming updates and reports by the AML/THB project.

## 2. Trends of Emerging criminal Threats Globally:

### 2.1 Counterfeited Pharmaceuticals and Medical Equipment:

A global operation coordinated by [Interpol](#), named Operation Pangea XIII, revealed that the outbreak of the deadly COVID-19 has intensified the production and supply of counterfeit medical supplies. [Operation Pangea XIII](#) led to arresting of hundreds of criminals and seizure of “counterfeit and sub-

standard masks, medicines “corona spray”, “coronavirus packages” or “coronavirus medicine” that indicates a rising criminal trend. The operation also closed down “more than 2,500 web links” that engaged with illicit pharmaceuticals. These crimes profoundly undermine public safety and health in general and impede the fight against the pandemic on top of the illegal profiteering of criminal groups. Countries have also [reported](#) increased seizure and interception of COVID-19 related counterfeit and defected supplies.



Interpol: Seized dangerous Pharma, Operation Pangea, 2020

### 2.2 Cyber scams, fraud, disinformation and other cyber-enabled crimes

Lockdowns and movement restrictions have turned consumers and service providers to rely on internet-based solutions. Advisories given by governments and banks to minimize use of currencies to avoid infections have encouraged people and service providers to depend on online services more than ever. Interpol has already issued a [public alert](#) about the risk of financial frauds or scams whereby criminals create “fake shops, websites, social media accounts and email addresses claiming to sell ... [highly demanded protection equipment and “medicine” for COVID-19] online” to which victims make payments to accounts controlled by criminals. In its alert, Interpol [claimed](#)

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that it has blocked 18 fraudulent bank accounts freezing above USD 730,000 in Europe and Asia. Fake links claiming for fund raising, donations, tax refund and medicine or cure are some of the scams being observed recently related to the pandemic.

Cyber attacks on healthcare systems including the WHO has been [reported](#) while cybersecurity firms, as reported by [Forbes](#), registered a massive surge in COVID-19 related attacks. [EU-ROPOL reported](#) that two European Union Member States have lost about EUR 6.9 million to scammers in their attempt to purchase masks, sanitizers and other COVID-related medical items. [News1 reported](#) that Italian Finance Police, Guardia di Finanza, arrested a casual businessman for a suspected €15 million who attempted to defraud a public contract to supply 24 million masks. Italian Police also [claimed](#) that the suspect was also trying to win €64 million worth of public tender to supply medical materials. This is a deadly crime against human life.

### 2.3 Illicit Financial Flow and Money Laundering

Illicit financial flow and money laundering are often the result of the predicate offences that generate profits, though illicit financial flow can come as a crime by itself. Illicit financial flow and money laundering are highly anticipated crimes during the pandemic crisis as warned by multiple agencies. However, actual reports in this regard remains scanty, though scale and prevalence cannot be judged in this short time. Although physical movement of cash is expected to be compromised because of the closing of borders, money laundering on the other hand will spike because of the evolving and emerging crimes stated above. In a period of financial/economic crisis, criminals are likely to spend their money on gold and other precious stones which can also be used to launder criminal proceeds. Criminals may also abuse government stimulus funds and donations through fraud and corruption that can cause illicit financial flow. FATF forecasts that market crisis may incentivize criminals to invest in real estate or other high-value business when the market is down that would facilitate cleansing of the dirty money. Terrorists can also be engaged in profit-intensive businesses and demand driven smuggling of goods.

For a good summary on COVID-19 related emerging and evolving criminal threats, see a [policy brief](#) and subsequent updates on [COVIDCrimeWatch](#) by the Global Initiative against Transnational Organized Crime. The FATF has also issued a non-paper guideline on the money laundering and terrorism financing risks related to the COVID-19 pandemic.

## 3. Trends of Emerging and Evolving

Criminal Threats in the GHoA: The GHoA region is susceptible to many forms of serious and organized crimes as a result of weak law enforcement regime, porous borders, poverty, weakly regulated market, imperfect supply chain, corruption and inadequate/fraud anti-money laundering (AML) and asset recovery regimes. According to the [2019 crime index](#), the region scores above African average criminality and lower resilience capacity that makes it highly vulnerable. As part and parcel of the wider globe, the GHoA region cannot be spared from the emerging and evolving threats.

### 3.1 Counterfeits and substandard goods

As the pandemic ravages across the globe and slowly but certainly coming to the region, the demand for medical equipment is increasing but supply remains short, and false information

are creating a need for medicine out of panic and confusion. This creates a perfect profiteering opportunism to criminals. It is [reported](#) that Ethiopian Standards Agency and Conformity Assessment Enterprise officials last week claimed that 70 percent of alcohol-based sanitizers available in the market are below the standard set by WHO that cannot kill the virus and as a result [ten providers are named and banned](#) by the Ministry of Trade and Industry and 14 out of the 20 sanitizers tested by the conformity enterprise are found to be below the standard and are [banned](#). The Ministry admitted the prevalence of illicit business practices and [reportedly](#) closed about 700 shops and businesses engaged in illegal profiteering since the breakout of COVID-19.

In Kenya, the government is taking measures to undermine Covid-19 related criminal activities. Kenya Police raided a shop that was allegedly selling test kits illegally that led to an [arrest](#). It is [reported](#) that Kenyan Bureau of Standards has banned eight counterfeited or substandard sanitizers.

### 3.2 Cyber scams, fraud, disinformation and other cyber-enabled crimes

Ethiopia declared that it is enhancing its national payment system and banking through digital means as stipulated in the recent [directive](#) issued by the National Bank of Ethiopia. An Ethiopian bank informally requested about new cyber-related crimes responded that there is a trend of increasing attempt of email-based scams and frauds but he cannot confirm whether it is directly related with the pandemic. Other two banks responded that they did not observe a new threat though the situation of the pandemic has created vulnerabilities. Kenyan banks are providing repeated alerts on the potential danger of frauds and scams by criminals that need further investigation. Generally, it is observed that the more internetbased services and interactions are becoming a norm the more financial services and their clients are vulnerable to infiltration and attack by criminals.



EUROPOL: Alert on COVID-19 related cyber frauds



The more services depend on internet, banks and other services are becoming more online, much of citizens of all walks of life are working from home (with likelihood of an increase in internet and mobile subscribers and users) cyber-related crimes are likely to intensify facilitating counterfeit market and fraud.

### 3.3 Illicit Financial Flow and Money Laundering

Working from home may limit some capabilities in identifying and producing suspicious transaction reports (STRs) at banks and Financial Intelligence Units (FIUs) might face the similar challenge with limited capacity of analyzing and dispatching STRs. On site (field) supervision is going to be hampered because of the imposed limitations of movement and banning of meetings (physical). An official from a national FIU stressed that they did not receive any report specifically linked to the pandemic nor provide direction on the potential new threats stemming from COVID-19.

### 4. Conclusion and way forward

Inherently, organized criminals are opportunistic. Criminals are thinking enemies capable of abusing the weakness of systems and societies that are not attentive enough and proactive to the emerging threats posed by organized crime. It is fair to conclude that despite the pandemic has disrupted some criminal activities and criminal networks, it also has posed evolving and emerging threats and vulnerabilities. Notably, counterfeited and substandard or false pharmaceuticals, medical equipment and other mandatory goods related to COVID-19 are likely to surge manipulating anxiety of society, shortage of supply and for the reason that these crimes have been embedded in the region.

There is a growing fear that criminals could involve in selling of chloroquine of both genuine and falsified that has a dual negative impact to society. The more services depend on internet, banks and other services are becoming more online, much of citizens of all walks of life are working from home (with likelihood of an increase in internet and mobile subscribers and users) cyber-related crimes are likely to intensify facilitating counterfeit market and fraud. These crimes generate significant amount of proceeds that are subject to laundering or fund other crime. Money laundering from these new and/or evolved predicate

crimes is therefore prevalent in different forms including acquiring high value investments, commodities and businesses in trouble.

It is obvious that governments are taking actions against criminal threats stemming from the pandemic though varied in terms of approach and intensity. Learning from other experiences and analysis, the following recommendations are suggested to address the threats emerging with COVID-19.

- **Promote public awareness** about the threats and possible mechanisms to redress the risks posed by organized criminals as part of the intensified antiCOVID-19 campaign and through specialized crime prevention instruments
- **Strengthen risk-based multi-agency comprehensive approach through effective national and local cooperation and coordination:** This includes enhancing interagency cooperation and coordination within governments, effectively engaging the private sector, non-profit organizations and research facilities; and exchange of information and experiences among FIUs, LEA, regulatory bodies and financial institutions to learn from each other and render joined up solutions. Financial services are important actors in implementing enhanced AML measures, ensuring fortified security in their system and applying specific risk indicators on the emerging threats;
- **Regularly monitor, analyze and update** vulnerability factors and emerging and evolving risks associated with the pandemic;
- **Strengthen cybersecurity** infrastructure and capabilities to defend systems, protect customers/citizens from fraudulent activities; and
- **Develop national money laundering risk indicators** of the emerging criminal threats based on the findings of monitoring and analysis of the context and practices to be implemented by reporting entities

# AML-THB INTERVENTIONS IN THE FACE OF THE COVID-19 PANDEMIC IN THE GREATER HORN OF AFRICA

20 April 2020

By Alma Wanyama

*The author is a Technical Advisor to the AML-THB Project.*

Some countries within GHoA have taken minimal measures in the fight against the Covid 19 pandemic thus undermining efforts to address the spread of the pandemic while most are being guided by borrowed measures referenced from success cases in some European states which may turn chaotic as negative outcomes have been seen in some African countries like South Africa and Nigeria where such measures turned chaotic.

## Introduction

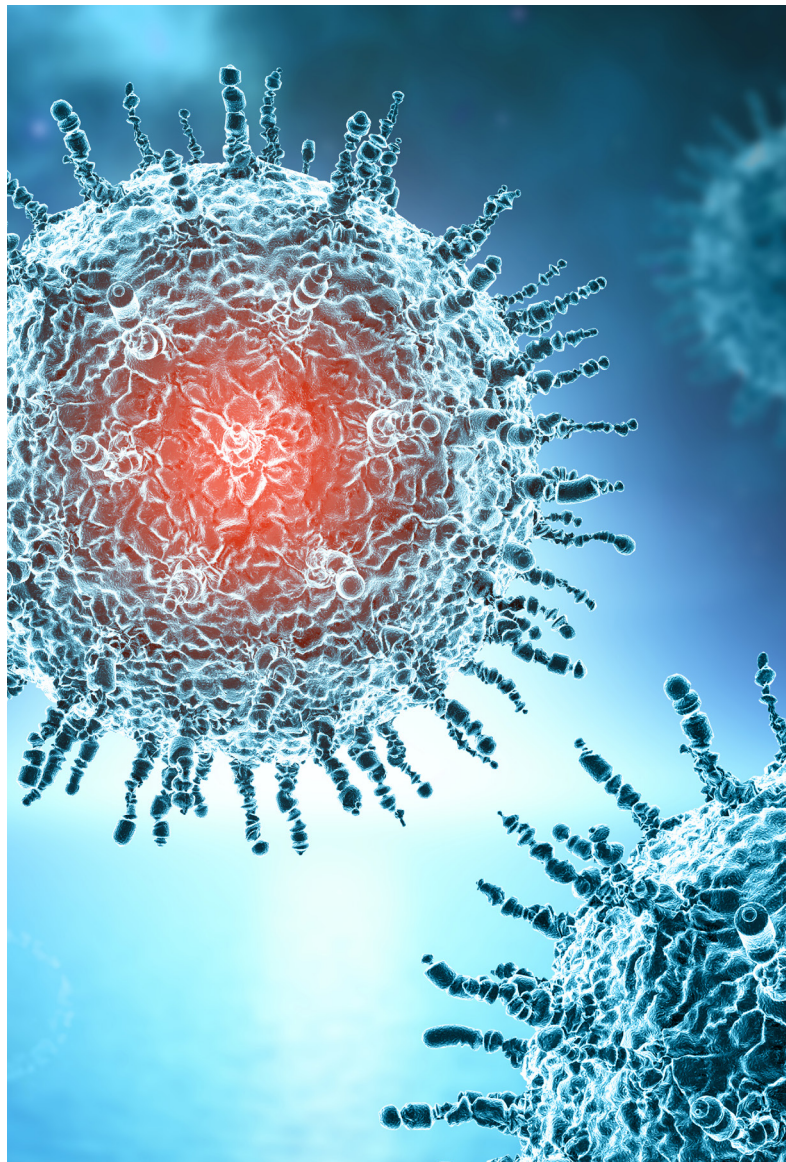
The efforts by Greater Horn of Africa (GHoA) states to mitigate the impact of the Covid 19 pandemic have witnessed implementation of adverse measures including curfews, movement restrictions, declaration of state of emergency, and engagement of researchers and local manufacturers to develop testing kits, ventilators, masks, vaccines and drugs.

The Covid 19 pandemic has exposed weak health systems within the region, thus a threat to the region's state and human security. As a result, regional meetings including Intergovernmental Authority on Development (IGAD) Extra Ordinary Heads of States Summit and various East African Community (EAC) Organs meetings have given impetus for a joint regional approach towards fighting the pandemic.

However, the geopolitical, economic and security situation within the GHoA region is diverse, a situation that calls for a varied approach based on each state's context and intervention measures to address the pandemic. Subsequently, as GHoA states continue to address the Covid 19 pandemic, the Anti Money Laundering and Trafficking in Human Beings (AML-THB) project can provide technical support to the pre-mortem, in-mortem and post-mortem initiatives and trainings that are geared to compliment measures put in place to fight the pandemic.

GHoA countries are faced with challenges that could impede efforts to address Covid 19 Pandemic, thus the need for partners to provide technical assistance.

The Intervention measures would include addressing the challenges in the security sector brought about by the pandemic with specific focus to AML/CFT/THB in line with the project objectives. To that effect, the project can address measures put in place to stop the spread of the pandemic by GHoA



A 3D render of the Covid 19 virus cells: © freepix.com

states such as shift to paperless financial transactions.

Additionally, the interventions could address the negative impact of Covid 19 pandemic on AMLTHB issues in the face of porous regional borders, lack of a common regional strategy and proliferation of new countermeasures by criminal groups. This will allow the training to target FIU's, Police, Immigration and border officers, State Intelligence, ODPP, Banks and financial institutions to address the impacts of Covid 19 measures put in place.

Some of the AML-THB areas impacted by GHoA states counter measures against Covid 19 pandemic through which the project can conduct capacity building interventions include:

- **Illicit financial flow** - Online payment methods and other cashless payment options have been encouraged by



most governments to avoid physical handling of money that may lead to further spread of the virus.

Subsequently, financial institutions and mobile money services have increased limits to their customers to encourage cashless transactions. However, the ensuing situation is likely to be exploited by criminal elements to launder money and fund terror activities.

As a result, there has been an escalation of cybercrime as criminals take advantage of the uncertainty brought about by the Covid 19 pandemic to scam unsuspecting targets.

The push by GHoA states for cashless payment provides an **opportunity** towards sharing with financial entities on matters relating to “following the money” because this kind of transactions tend to leave a financial trail.

This will provide a platform for the project to interact with the FIU's, Banks and police on how to counter movement of illicit funds within the GHoA as well as unearthing criminal networks by simply following the money.

- **Human trafficking/smuggling** - The escalation of Covid 19 preventive measures including closure of borders has witnessed a rise in illegal activities within ungazetted border points.

Traffickers and smugglers have capitalized on the stringent measures placed by governments within the GHoA to cash in on the illicit activity, a situation that is undermining efforts to address the spread of the pandemic.

Similarly, some trafficked persons are trapped in countries under lockdown or with curfews.

Movement restrictions is likely to accentuate indoor exploitation activities especially for those who are already in such situations e.g. sexual exploitation and domestic labour exploitation.

Economic downturns are also likely to push desolate victims into the hands of traffickers especially during this crisis where governments are more focused to the pandemic.

To that effect AML -THB project will focus on engaging police and immigration and border point officers within the region to share information in virtual and online forums on new trends in human trafficking/smuggling that are likely to curtail efforts to fight the pandemic

- **Lack of a common GHoA strategy against Covid 19 Related threats** - The measures by GHoA states continue to differ due to national policies on addressing the pandemic as well as financial and medical infrastructure.

Some countries within GHoA have taken minimal measures in the fight against the Covid 19 pandemic thus undermining efforts to address the spread of the pandemic while most are being guided by borrowed measures referenced from success cases in some European states which may turn chaotic as negative outcomes have been seen in some African countries like South Africa and Nigeria where such measures turned chaotic. This is likely to be counterproductive in efforts to address Covid 19 within the GHoA.

Subsequently, traffickers and smugglers are likely to adjust their routes to where is more favourable to their operations.

This will change the trend that has been their norm as they will adapt to a new norm owing to the crisis. Taking cognisance that the Courts are operating on skeleton staff and some countries like Kenya are decongesting the prisons by releasing petty offenders, some crimes during this pandemic may go undetected/unpunished and criminals will take advantage of this.

To that effect, this will give the project an opportunity to collaborate with GHoA states, key regional blocs including the EAC and IGAD that have seen the need for joint approach on the Covid 19 pandemic to address transboundary security issues and regional AML-THB challenges as a result of the pandemic. >>> **PG. 10 - 11**

## AREAS OF TRAINING/INTERVENTION

### • Impact of Covid 19 pandemic on THB:

- » Likely to undermine efforts to contain the pandemic as criminals change their modus operandi to beat systems set by governments

- » Traffickers/smugglers likely to raise the cost of their operations due to the high risk involved with the travel restriction in place. It will become more lucrative.

Similarly, increase in mobile money limits as way of encouraging mobile money transaction is likely to complicate the fight against the pandemic

- » Unemployment will create destitute situations that will result in regional movement in search of better opportunities

### • Illicit financial flows:

- » Training of financial institutions on the risks of cashless and online transactions and ways to mitigate.

- » The move by some GHoA states to push for cashless transaction during the Covid 19 pandemic has provided an avenue for the project, geared towards enhancing investigative capacities as well as sharing information in the fight against TF and ML within the GHoA.

### • Corona virus pandemic: Covid 19 pandemic and cyber security

- » Increased online activities will lead to increase in cyber-crime proceeds that are likely to be channelled to terrorism financing among other crimes

- » How Covid 19 is changing law enforcement practices and crime within GhoA

### • Covid 19 and terrorism financing:

- » Non-Governmental Organizations and other institutions could be used as fronts to fund terrorism or launder money under the guise of “assisting countries in need”

### • Adoption of a common regional approach towards addressing AML-THB issues in the face of the Covid 19 pandemic.

- » The Covid 19 pandemic has given the project an opportunity to partner with already established regional blocs including EAC and IGAD.



A medic holding face masks and sanitizer: © freepix.com

### Methodology

In the wake of the Pandemic, physical engagements have been deemed impossible, therefore online engagements remain the best option. The project will engage the expertise of its two permanent technical experts as well as non-key experts in the respective fields.

Tentative mode of engagement with partners will be through:

- » Newsletters
- » Published articles
- » Webinar
- » Interactive online courses with certification
- » Email communications
- » Online conference calls

### Other areas of Interventions

- » Cross-border coordination by facilitating communication among relevant stakeholders.
- » Support with case management – financial intervention at the isolation centres and quarantine facilities.

- » Monitoring and analysis of threats, vulnerabilities, typologies and modus operandi of criminals and their networks regularly and updating beneficiaries. This will help countries to learn continuously and proact on crimes reducing the impact in the fight against the pandemic and protecting vulnerable groups. This include continuous assessment, evidence gathering, consolidating good practices/experiences, analysis and mapping, sharing of findings (feedback/input), monitor and evaluate etc that constitute a form of criminal intelligence management and crime research processes
- » Promote cyber awareness about the threats and vulnerabilities and mechanisms to redress the risks to FIUs, LEAs, financial services, regulatory bodies through dissemination of newsletters, technical articles, online briefings and other platforms
- » Strengthen cybersecurity capability of relevant institutions within a reachable scope – through technical trainings, sharing of experiences
- » Support FIUs and regulatory bodies to develop and update ML/TF risk indicators and guidelines on the evolving emerging risks for financial institutions and other reporting entities



**Monitoring and analysis of threats, vulnerabilities, typologies and modus operandi of criminals and their networks regularly and updating beneficiaries will help countries to learn continuously and proact on crimes reducing the impact in the fight against the pandemic and protecting vulnerable groups.**

to better detect, identify and disrupt criminal financial flows and produce evidences/intelligence to investigate and prosecute criminal networks (of the predicate crimes).

- » Strengthen analytical capability of FIUs to produce actionable intelligence, effective cases for investigation and possibly initial evidences
- » Training and good practices sharing on ML/TF through informal money and value transfer systems such as Hawala that are expected to be highly utilized in financial transactions.
- » Facilitate information/criminal intelligence sharing among FIUs, LEAs, anti-corruption bodies and regulatory agencies of the countries of the GHoA and other regions as well. Support national and regional institutional cooperation and coordination in relation to information sharing.
- » Sensitize law enforcement and security agencies on how to behave and respond to social disorders that require a high level of professionalism, discipline, patience and solving public issues by engaging communities, in line and respect of human rights principles.

### Conclusion

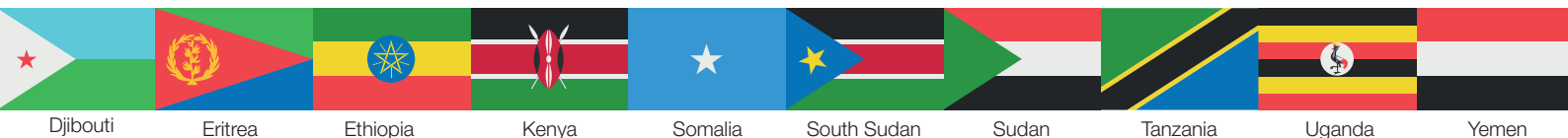
The Covid 19 pandemic compelled states across the globe take measures to contain the spread of the coronavirus.

This will not stop criminal from conducting their activities as they try to beat the systems put in place.

These criminal threats will continue and evolve even in post-crisis period with adopted modus and typologies.

It is paramount for the governments to focus on the emerging criminal trends and threats as they continue focusing on the pandemic which is undeniably a threat to economic, political and social sectors of the states.

Human trafficking and smuggling is a cross border crime that needs a regional approach in dealing with it hence the intervention measures by AML-THB project.



Djibouti

Eritrea

Ethiopia

Kenya

Somalia

South Sudan

Sudan

Tanzania

Uganda

Yemen

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