



# 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)



This project is funded by the European Union

## AML-THB NEWSLETTER

Issue No. 4 | July 2020

### MESSAGE FROM THE PROJECT DIRECTOR



It is my great pleasure to ‘virtually’ greet you once again for this, the fourth issue of our newsletter, which is more technical, in-depth and varied than previous editions.

Together with the Anti-Money Laundering–Trafficking of Human Beings (AML-THB) team, I take this opportunity to extend our warmest congratulations to the newly appointed Head of the Ethiopian Financial Intelligence Centre (FIC), Tewodros Bekele Gerbi, who shares his impressions and thoughts in a fascinating article in this newsletter.

We are also pleased to share the thoughts of the Head of the South Sudan financial investigating unit (FIU) on the development of a framework for mitigating the challenges facing his organisation.

And, having mentioned the ESAAMLG, we are also very pleased to welcome the following to the project’s community of observer countries: Madagascar, Malawi, Mauritius, Mozambique and Seychelles, who will be joining us in the coming weeks as participants in the virtual training programmes designed specifically for FIUs.

With regards to the successfully concluded ToT Refresher and Upgrade training, I would like to acknowledge and thank our ever-faithful international experts – Simon Goddard (UK), Kamlesh Ramdhary (Mauritius), Terry Davis (United Kingdom) and Tim Bremmers (Netherlands) – who have committed themselves resolutely to ensuring the success of the training sessions. In this edition, Tim talks about these training sessions in greater detail, and two trainees – Ismael Ali Jama (Somalia) and Herbert Mulumba (Uganda) – also give their feedback as participants.

Last but not least, we present a remarkable article by our colleague and AML-THB project trainer, Anteneh Mekonnen Maru, who is an extremely talented Certified Anti-Money Laundering Specialist (CAMS) and who is already involved in our capacity-building training aimed at the private banking sector in Bishoftu (Ethiopia), with the support of the Ethiopian Central Bank and the nation’s FIC.

I trust this edition will provide you with an enjoyable and informative read. Do not hesitate to send your opinions, comments and suggestions to [info@aml-thb.eu](mailto:info@aml-thb.eu).



# ETHIOPIA'S FINANCIAL INTELLIGENCE CENTRE

## A Central Authority of the AML/CFT system

**Tewodros Bekele Gerbi**

*Head of the Financial Intelligence Centre, Ethiopia*

The Ethiopian Financial Intelligence Centre (FIC) came into operation in 2012 and is governed by several domestic laws made since 2009. The FIC adheres to the Financial Action Task Force (FATF) standards as well as other international legal and policy instruments in the fight against the crimes of money laundering, financing of terrorism, and the financing of proliferation of weapons of mass destruction (WMD). Currently, the FIC is a member to the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), as well as the Egmont Group of Financial Intelligence Units.

The Centre has several duties and functions aimed at fulfilling its organizational mission to respect and observe international and national obligations, to enable the country to control and suppress Money Laundering, Financing of Terrorism and financing of proliferation of WMD. Additionally, the FIC has a mission to enhance the capacity to provide quality and timely financial intelligence to protect the Nation's financial and commercial system from such crimes and to contribute the national security of the country. To successfully achieve the abovementioned, the centre works with various local stakeholders such as financial institutions, designated non-financial businesses and professions, Non-profit organizations and all other institutions that are vulnerable to financial crimes with an aim to effectively implement AML/CFT framework of the country. Subsequently, Ethiopia is committed to the sustainability of regional and international peace hence collaborates with other national and international institutions by providing intelligence and timely information to assist in investigation and prosecution of these crimes.

Corruption, human trafficking and migrant smuggling, tax Evasion, goods smuggling (contraband), fraud and illegal hawala are categorized as high level threats in the ML/FT National Risk Assessment of Ethiopia. To address the threats and to strengthen local coordination, the EFIC has delivered a series of awareness raising trainings to reporting entities, law enforcement authorities, and regulatory bodies. In addition, a National AML/CFT Committee is established, which is composed of 17 relevant government bodies, Ministers, and high-level officials. The Committee is chaired by the Ministry of



Peace of the Federal Democratic Republic of Ethiopia. EFIC serves as the secretariat of this committee. The National Committee has also established a Steering and Technical Committees from respective organizations to support its operational activities. In cooperation with the Ministry of Peace, EFIC organizes annual federal and regional law enforcement forum intended to strengthen coordination in fighting ML/FT.

Human trafficking and migrant smuggling as one of the serious threats and estimated to generate high proceeds due to their pervasive nature. Ethiopia is a source and transit point for illegal migration with people migrating to western countries, the Middle East, as well as some African countries. Migrants from Eritrea also transit via Ethiopia to similar destinations, while migrants from Somalis also use Ethiopia as a transit hub to travel to Europe via the Mediterranean Sea. For this reason, the country particularly, the centre focuses on fighting this crime vis-à-vis contributing to the global AML/CFT system.

Notably, Financial Action Task Force (FATF) and the European Union (EU) removed Ethiopia from the list of countries that are subject to monitoring as well as high risk countries in relation to money laundering and terrorist financing. The EU's recent decision in May 2020 became consistent with FATF's decision passed in October 2019 regarding the status of Ethiopia in the global AML/CFT framework. In both cases, the decisions emanated from Ethiopia's strong commitment and actual progress in strengthening its AML/ CFT regime. The Ethiopian Financial Intelligence Centre is at the heart of this remarkable progress of the country in addressing strategic as well as technical deficiencies.

# MESSAGE FROM THE SOUTH SUDAN FIU

**Moses Marier Mading**  
*FIU Executive Director*

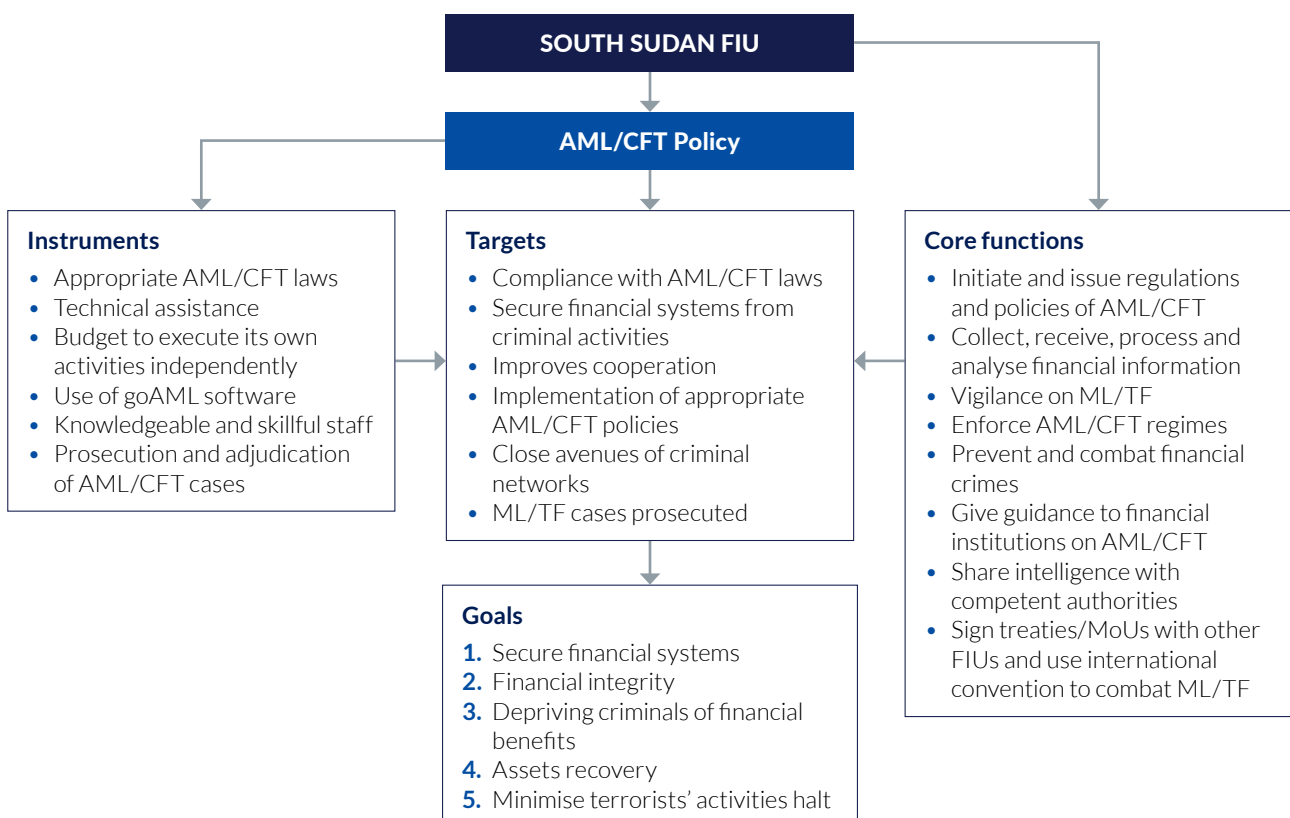
**T**he Republic of South Sudan has recently established its Financial Intelligence Unit (FIU), which is legally mandated to serve as the central authority in the country's anti-money laundering (AML) and countering the financing of terrorism (CFT) operations. The FIU is one of the key institutions entrusted to prevent and counter money laundering and terrorist financing within the country and beyond its borders via its international network and through cooperation with other FIUs. Although the South Sudan FIU is at its nascent stage, the European Union (EU) AML/CFT Project in the Greater Horn of Africa (GHOA) has already contributed positively by awakening respective government stakeholders concerned with the AML/CFT principles and policies and by promoting cooperation amongst FIUs in the region.

Despite its young age, the South Sudan FIU has so far received remarkable support and cooperation, notably from our international partners. As a case in point, the FIU has already received a number of suspicious transaction reports (STRs) from our counterpart in Uganda, even before our mutual Memorandum of Understanding (MoU) has been signed, thanks to the existing working relationship between the two FIUs.

Operationally, the FIU is still in a developing stage, but one that is headed in the right direction in its adherence to the Financial Action Task Force (FATF) Standards and other international benchmarks. The FIU has laid out its principles of work based on the conceptual framework depicted in Figure 1.



**Figure 1 FIU conceptual framework, South Sudan**



*The FIU and its management firmly believe that corruption is the primary predicate offence, generating an immeasurable amount of dirty money in the country.*

With the above conceptual framework, the FIU of the Republic of South Sudan will be certain of success in all aspects of its operations. The FIU will act swiftly through independent accountability mechanisms to ensure that perpetrators of money laundering and terrorism financing, and their criminal networks, are brought to book. Based on the foundation of its conceptual framework, the FIU will prevent culprits from enjoying any criminally earned financial benefit, thus playing a critical part in the fight against corruption in the country. The FIU and its management firmly believe that corruption is the primary predicate offence, generating an immeasurable amount of dirty money in the country. I quote from John F. Kerry (Former US Secretary of State) at the 2016 IMF annual meeting:

*"[C]orruption is a social danger because it feeds organized crimes, it destroys nation state, it imperils opportunities particularly for women and girls, it silicates environmental degradation, contribute to human trafficking and undermine all communities. [...] If we deepen the fight against corruption making it a first order national security priority."<sup>1</sup>*

The FIU, guided by its operational principles and according to its conceptual framework, will explore all possible means at its disposal to help raise awareness about the dangers of money laundering and terrorist financing in order to protect the integrity of the financial system and promote economic growth. The South Sudan FIU acknowledges the efforts made by the EU AML/CFT Project in the GHoA and its contributions to the progress on AML/CFT in the region. The FIU further acknowledges the efforts made by our international partners to combat money laundering and terrorism financing. We can no longer afford to ignore these crimes because they have an extremely negative impact on our economies. The South Sudan FIU is very mindful of the necessity to involve all stakeholders within its AML/CFT policy and regulatory framework because our ideals are built on trust, honesty and, above all, on cooperation and coordination.

Furthermore, the South Sudan FIU reaffirms our commitment to these principles of trust and honesty. Guided by the above conceptual framework, the FIU is more than willing to devise any new techniques for establishing an effective AML/CFT regulatory framework and strategy. Finally, it is important to remind ourselves how crucial international cooperation is, and in that spirit, pledge our commitment to the journey ahead of us.

---

1 John F. Kerry (2016), <https://www.youtube.com/watch?v=04BN6UOVKOM>



© Wollwerth Imagery/Adobe Stock

# STRENGTHENING PUBLIC-PRIVATE PARTNERSHIPS

## The key to improving AML effectiveness among ESAAMLG member countries

**Anteneh Mekonnen Maru<sup>1</sup>**

Since 2013, the Financial Action Task Force (FATF) has made a significant change in its methodology for assessing the adequacy of nations' anti-money laundering (AML) and counter terrorism financing (CTF) strategies. Countries are now deemed in compliance with the FATF recommendations only when they fulfil the technical requirements and after ensuring their AML/CTF apparatus is effective in producing the expected results as set out in the FATF intermediate and immediate outcomes.<sup>2</sup> Countries thus need to invest more resources to ensure their AML/CTF frameworks are working and producing results in protecting their financial systems and broader economies from money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction.

The Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) conducted AML-effectiveness assessments for at least nine of its member countries using the new FATF methodology;<sup>3</sup> however, no country scored either a substantial or high effectiveness rating in any of the 11 FATF effectiveness measures.<sup>4</sup> The ratings assigned by the assessors are either for a moderate or low level of effectiveness.

The assessment results indicate that member countries should direct more resources towards improving their effectiveness. One of the major gaps in effectiveness repeatedly mentioned in the mutual evaluation reports (MERs) is the fact that the AML measures undertaken do not correspond with the risk profile of each country. Specifically, the major gaps listed below are consistently mentioned in most of the MERs:

- Suspicious transaction reports (STRs) generated by reporting institutions are not adequate in covering the high-risk predicate offences identified in respective national risk assessments (NRAs) and MERs.

*Countries are deemed in compliance with the FATF recommendations only when they fulfil the technical requirements and after ensuring their AML/CTF apparatus is effective in producing the expected results.*

---

1 Anteneh Mekonnen is an AML Consultant and a Certified Anti-Money Laundering Specialist (CAMS). He has more than nine years' experience as a Senior Compliance Officer in the financial sector. He has also participated in various AML projects, including acting as the Steering Committee Chairperson on the Ethiopian National Money Laundering and Terrorism Financing Risk Assessment. He has participated as a speaker and facilitator in various local and foreign AML/CTF workshops/projects organised by both local and international institutions, including the Global Center on Cooperative Security, UNODC and the European Union. He can be reached via email: [antenehmaru41@gmail.com](mailto:antenehmaru41@gmail.com).

2 FATF (2013) FATF Methodology: Assessing technical compliance with the FATF recommendations & the effectiveness of the AML/CTF systems, page 16, <https://www.fatf-gafi.org/publications/mutualevaluations/documents/fatf-methodology.html> accessed 24 May 2020.

3 ESAAMLG Second Round Mutual Evaluation Reports, [https://www.esaamlg.org/index.php/Mutual\\_Evaluations\\_Second](https://www.esaamlg.org/index.php/Mutual_Evaluations_Second) accessed 27 May 2020.

4 See fn3 above to access the MER of each assessed country (Malawi, Zambia, Seychelles, Mauritius, Madagascar, Botswana, Zimbabwe, Uganda and Ethiopia).



*One of the measures that countries need to undertake is strengthening PPPs among reporting institutions, regulatory bodies, FIUs and law enforcement agencies.*

For some countries, the great majority of STRs focus on one or two high-risk predicate crimes.

- For some countries, money laundering (ML) investigations and prosecutions are generally very few or non-existent, and do not sufficiently reflect the scale of these countries' risk profiles.
- STR analysis and dissemination is not consistent with the ML risks as identified in the NRAs or MERs. For example, for some countries that identified corruption as a high-risk predicate crime, no STRs have been reported or disseminated during the assessment period.
- Few STRs are reported by designated non-financial businesses and professions (DNFBPs) even though some of the businesses and professions in this sector are regarded as high risk, and this potentially deprives the FIUs of the necessary transaction information to identify possible cases of ML.

The above findings indicate that the national AML/CFT frameworks in the ESAAMLG region need to strengthen their operational effectiveness to successfully detect and identify illicit funds from high-risk predicate offences, to adequately generate high quality and adequate STRs, and to effectively investigate and prosecute ML cases commensurate with the risk profile of each country. One of the measures that countries need to undertake to fix such gaps is strengthening private–public partnerships (PPPs) among reporting institutions, regulatory bodies, FIUs and law enforcement agencies. PPPs are essential for enabling the AML stakeholders in a country to build a common understanding of high-risk predicate crimes and then collaborate to direct efforts and resources towards detecting and identifying the illicit proceeds from such crimes and to then successfully investigate and prosecute ML perpetrators.

Best practice reveals that PPPs are essential for improving the effectiveness of AML frameworks in investigating and prosecuting money laundering and further countering the predicate offences. See Box 1 and Box 2.

### **Box 1 United Kingdom's FIU**

The National Crime Agency of the United Kingdom (UK) established the Joint Money Laundering Intelligence Task Force (JMLIT) to promote public–private partnerships (PPPs) to combat money laundering and the financing of terrorism. The JMLIT is a partnership across the UK's FIU, law enforcement and financial sector that exchanges and analyses information relating to money laundering and wider economic threats.

This PPP brought major benefits, including building trust and a common understanding of high-risk predicate offences and priority actions. Through the collaboration created by the JMLIT, the reporting institutions of the UK have been able to identify more than 5,000 suspicious transactions, which has resulted in 500 investigations, 130 arrests and the seizure and restraint of over £13 million. One of the major outputs of the JMLIT was the generation

of applicable indicators of suspicious transactions, which significantly supported the transaction-monitoring capability of the reporting institutions.

The JMLIT is a well-structured task force encompassing three key components: an operational group, a strategic group (which includes an experts' groups) and an alerts 'red flag' service. The strategic group identifies and assesses new and emerging money laundering and terrorist financing threats and sets the strategic direction of the JMLIT. It also seeks to identify legislative or policy vulnerabilities that can be escalated to the UK government. The operations group undertakes tactical intelligence-led activities and information sharing. A management board oversees the overall direction and performance of the JMLIT and promotes collective ownership of the priorities.

Source: [www.nationalcrimeagency.gov.uk/what-we-do/national-economic-crime-centre](http://www.nationalcrimeagency.gov.uk/what-we-do/national-economic-crime-centre)

## Box 2 Canada's FIU

The Canadian financial investigation unit, the FINTRC, and national reporting institutions forged a partnership to combat money laundering from high-risk predicate crimes that generate significant amounts of illicit proceeds in Canada. The partnership brought major benefits, including building trust, creating common understanding on high-risk predicate offences, and the development of applicable indicators that enabled reporting institutions to effectively detect illicit proceeds from high-risk predicate offences. The partnership enabled the Canadian AML apparatus to significantly increase the number of suspicious transaction

reports (STRs) and financial intelligence disclosures covering high-risk predicate offences including the trafficking of fentanyl, human trafficking and romance fraud. For example, the FINTRC received thousands of STRs relating to the trafficking of illicit fentanyl in 2018–19. The Centre was able to compile 148 actionable financial intelligence disclosures that led to fentanyl/drug trafficking investigations. It also received a significant number of STRs related to human trafficking during the same period, and was able to provide 250 disclosures of actionable financial intelligence to law enforcement agencies.

Source: FINTRAC annual report 2018/2019, page 11&12, <https://www.fintrac-canafe.gc.ca/publications/ar/2019/1-eng>

Similar successes could also be registered among other ESAAMLG members if countries established strong PPPs, and if the FIU capacity to support reporting institutions were strengthened. Actionable STRs that align with the risk profile of each country could be generated, which could facilitate effective analysis, investigation and the prosecution of cases. Effective PPPs in practice are a means to implement a risk-based AML/CFT approach in line with FATF recommendations. This will also significantly improve each country's effectiveness ratings – from a low and a moderate level and then on to a substantial and high level of effectiveness – in the upcoming mutual evaluation assessments. The respective countries and AML partners engaged in capacity-development projects should allocate resources accordingly and actively engage in strengthening PPPs among all ESAAMLG countries and build the capacity of the FIUs to play their central role in improving AML effectiveness. The resources and support, among other factors, should focus on the following areas:

- **Institutionalise PPPs:** The AML strategy, in order to bear fruit, requires close partnerships among law enforcement agencies, FIUs and reporting institutions. Law enforcement agencies should see reporting institutions as partners in the fight against crime. The AML framework has created an ideal platform for PPPs to combat economic crimes. Reporting institutions employ tens of thousands of personnel in each country and this force could be developed into a large army to combat economic crime within the AML arena. Partnerships are especially important for creating common understanding of high-risk threats as per each NRA. They will also create an environment in which reporting institutions, FIUs and law enforcement agents exchange and analyse intelligence to detect, prevent and disrupt money laundering and broader economic crimes. PPPs will also enable reporting institutions to be on the same page with

FIUs and law enforcement bodies, and they can thus collectively collaborate on tackling high-risk threats. The collaboration could go as far as recommending policy changes that could be escalated to government in order to combat crimes in a more effective way.

Institutionalising PPPs in the form of a task force, or other appropriate body, significantly increases AML effectiveness in each ESAAMLG country, especially in making the AML approach more adequately reflect the risk profiles of each country. PPPs should be well-structured and resourced, and governed by a management board comprising representatives from the FIUs, law enforcement agencies and reporting institutions. In order to institute PPPs, countries need to develop policy frameworks and guidelines on PPP where they do not yet exist, or the ESAAMLG can be tasked with developing appropriate model frameworks or regional guidelines, taking best practice into consideration.



© Panumas/Adobe Stock

*Countries need to ensure their AML strategy includes training programmes that educate all AML stakeholders.*

- **Strategic analysis and the development of indicators of STRs:** One key area that could be learned from Canada's FINTRAC and the UK's JMLIT is conducting strategic analysis covering each high-risk predicate crime as identified in the NRAs, and the development of a corresponding list of indicators of suspicious transactions. These indicators have assisted the reporting institutions in both countries to detect illicit proceeds that correspond with the risk profile of the country. The ESAAMLG countries could also undertake to draw up similar procedures. An in-depth strategic analysis covering each high-risk predicate crime should be conducted, and a corresponding list of indicators of suspicious transactions should be developed. Following on from the strategic analysis, the indicators should be indigenous and address each country's unique environment. If countries are able to align suspicious transaction reporting with their risk profile, ML investigation and prosecution will also be risk-based since ML investigations are usually derived from such reporting.

After the STR indicators have been developed, countries need to ensure that reporting institutions effectively incorporate them into their AML programme, including AML policies and training programmes, to enable the detection of suspicious transactions that correspond with the risk profile of the country. Reporting institutions that have employed AML software also need to ensure that the STR indicators are fully translated into procedures for conducting automatic transaction monitoring.

- **Capacity building:** Conducting strategic analyses on high-risk threats as well as developing the corresponding STR indicators requires expertise and resources. The capacity of countries to undertake strategic analyses needs to be strengthened. The task could be undertaken by the FIUs in close collaboration with other AML stakeholders, or by a team of experts organised under the PPPs. AML partners should assign resources to build the capacity of countries in this regard, and also promote PPPs by bringing together all AML stakeholders, including reporting institutions, via workshops or other means.

Furthermore, countries need to ensure their AML strategy includes training programmes that educate all AML stakeholders, especially the reporting institutions, on the major predicate offences identified by the NRA, including the consequences of the laundering of illicit proceeds on the integrity and services of the reporting institution. The training should also include, in sufficient detail, the social and economic costs caused by the predicate offences. For example, a country that identifies the smuggling of migrants and human trafficking as high-risk predicate crimes, should also educate the reporting institutions on the grave nature of the crimes in terms of the human suffering they cause, in addition to the ML methods and trends. This helps the reporting institutions to collaborate in the prevention of crime not only because they have a legal obligation, but because they also have a sense of responsibility.





# TRAINING AND MENTORING COURSE

## Upgrading ‘Silver’ and ‘Bronze’ TOT trainees to ‘Gold’ Certified Trainers – Stage 1: 8–26 June 2020

### Message and overview from ToT mentorship expert, Tim Bremmers

Dear Colleagues

It is both a pleasure and a privilege to be invited to share with you a report on the AML/THB Project’s Training of Trainers (ToT) and Mentoring activities.

Being 63 years of age, happily married for more than 37 years, a father of four and grandfather of four (and counting!), I am well aware that I am blessed. I am also blessed to have been involved in “policing” in the Netherlands for some 19 years (from 1980 to 1999) and, since 2000, in designing, implementing and evaluating security sector reform projects, both big and small, across Europe and in Central and South East Asia. This experience got me involved in training in North Macedonia and Pakistan, which then led me to the ToT domain that finally brought me here, to the Greater Horn of Africa.

The AML/THB Project’s current ToT & Mentoring activities in the Greater Horn of Africa originated in the preceding AML/CFT Project in the region. It is therefore laudable that the donor, the European Union External Action Service (EEAS), facilitated a swift and smooth continuation of the initial project so as not to lose the momentum already built up in the participating countries and in a wide range of institutions and their dedicated staff members.

As in many donor-sponsored projects, participants are trained to improve their own individual performances. Of course, stand-alone trainings are good, but may only be effective on this individual level. When, for example, strategies and policies are not in place to turn training outputs into outcomes, that is, when institutional performances are improved, there is often only short-term gain. There are many reasons for this, effectively, short-sighted approach, such as the simple fear of changing working methods, the fear of losing one’s position, vested-interest working cultures, uncertainties regarding a possible new mission and working role, and broader concerns about socio-political instability. Perhaps it is sometimes felt that the time is not quite right for extensive, long-term change. Moreover, personal and institutional change and performance improvements require time.

While the single-person focus continues, however, other colleagues are deprived of systemic professional training and education. Therefore, it is commendable that the AML/THB Project has decided to build upon the activities of the previous AML/CFT Project, taking lessons learned into account and continuing the ‘train the trainers’ approach.

In the AML/CFT Project, technical trainings were developed per sector in three levels, each going into more detail, for financial investigative units (FIU), law enforcement agencies (LEA), national intelligence services (NIS), the judiciary (prosecutors and judges), regulatory bodies (RB) and asset recovery (AR) units.



*It is commendable that the AML/THB Project has decided to build upon the activities of the previous AML/CFT Project.*

The ToT & Mentoring programme was implemented during the AML/CFT Project for Levels 2 and 3, and counted 143 participants from Uganda, Tanzania, Sudan, South Sudan, Somalia, Kenya, Eritrea, Ethiopia and Djibouti; there was also one guest participant from Burundi. Because the training was multinational and sector-specific, it provided a great opportunity for making regional contacts and strengthening multilateral cooperation. It is fair to say that the AML/CFT Chain of Justice was well covered, though there is still room for improvement.

COUNTRY	INSTITUTION							TOTAL
	FIU	LEA	NIS	PROS.	JUD.	RB	AR	
Djibouti	3	1	1	1	2	2	2	12
Eritrea	0	0	0	0	0	0	2	2
Ethiopia	2	4	0	3	4	2	3	18
Kenya	4	7	5	6	1	3	6	32
Somalia	2	3	4	5	0	2	2	18
South Sudan	0	3	3	3	0	2	2	13
Sudan	3	4	3	4	0	0	2	16
Tanzania	3	0	0	3	3	2	3	14
Uganda	1	4	3	3	3	2	2	18
Yemen	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>18</b>	<b>26</b>	<b>19</b>	<b>28</b>	<b>13</b>	<b>15</b>	<b>24</b>	<b>143</b>

During the Level 2 training, all participants participated in the ToT programme, which should ideally take one to two weeks or a minimum of three to four days, as a rule. Due to a variety of complex constraints, the participants only received a 1.5-day intensive ToT programme. Mentoring was then meant to make up for the shortness of the programme and provide the participants with support and guidance in order to achieve their personal best. During the Level 3 activities, in my capacity as ToT Mentor, ToT input and guidance was provided for each participant's individual learning objectives, which assisted them in delivering well-planned lessons.

The ToT and Mentoring programme covered the basics of Adult Learning, Training and Lesson Plans, Learning Objectives, Do's and Don'ts, Feed Back and Evaluation, and an Introduction to Mentoring. The mentoring was based on producing Personal Development Action Plans (PDAP), and the participants were supported and guided in drafting their lesson plans. Constructive feedback was given in the form of a brief personal SWOT (strengths, weaknesses, opportunities and threats) analysis on participants' designing of the learning objectives (LOs) for the lesson. To obtain the LOs, homework assignments were allocated, and these was evaluated on their content by technical experts and on their training-related aspects by the ToT Mentor. It goes without saying that continuous

constructive assessment and feedback was a feature of the mentoring.

After this period of mentoring, in national orchestration, Level 3 training events were organised per country. The purpose of these events was (i) to assess the trained trainers on their performance as in-house trainers within their organisations and (ii) to disseminate, for the benefit of their colleagues, the technical information and knowledge the participants had gained. In so doing, they demonstrated a multi-agency if not 'Chain of Justice' approach, and effectively called for combined improvements in this light. The final awards included 13 Gold, 56 Silver and 42 Bronze certificates, which were awarded, according to a scoring grid out of 30, for: PDAP engagement, lesson organisation, lesson content, performance and ToT characteristics. Regrettably, 32 participants were either not able or did not want to apply for the certificates. But, having said that, the final number of 111 certified and trained officials out of 143 participants is nevertheless a pass rate of 77.6%, which comes very close to the 'golden' pass rate of 80%! Moreover, during these Level 3 events, 478 officials in total received technical training. As a result, the AML/THB Project benefitted instantly from the 'Gold' officials, who were subsequently deployed to carry out a range of trainings throughout the region.

Currently, during this AML/THB Project, participants with Silver and Bronze certificates are offered an online Refresher and Upgrade course, via Zoom. At the end of this course (Stage 1), following another (brief) period of mentoring (Stage 2), they will be invited once more, at Stage 3, to deliver a lesson for evaluation. It is hoped for that we can reach out to as many of the 98 colleagues as possible who, after successful completion of the refresher course, will be awarded a new certificate. Obviously, we hope to be able to award more Gold certificates and that these colleagues will then become members of the regional group of AML (in-house) trainers. It is my personal hope that, in due course, the AML/THB Project will announce that as many as 20 more colleagues have been added to the regional pool of (in-house) trainers. This sequence of stages involves an additional element: the participants are encouraged to devise lessons on the most practical subjects possible – so, fewer general lessons, but more lessons on operational matters that will build specific capacity.

The feedback so far on Stage 1 has been, by and large, very good, as shown by the many satisfied messages we have received. And I must say that, directly after the three completed trainings, I am immensely proud of the commitment and effort the new trainees have shown so far towards improving their performance, thereby contributing substantially to the battle against money laundering, the financing of terrorism, the trafficking of human beings and the smuggling of migrants. Dear Colleagues: Keep up the Good Work!

## Participant feedback

We are honored to feature feedback from two participants, Ismael Ali Jama and Herbert Mulumba, who were in Group 1 of the Training and Mentoring Course: the Upgrading 'Silver' and 'Bronze' TOT Trainees to 'Gold' Certified Trainers programme, for law enforcement and national intelligence agents, and judiciary staff.

### Ismael Ali Jama

I am currently working with the Somalia Legal Centre in Hargeisa, Somaliland, as an AML/CFT/TIP Specialist. Prior to this, I worked as the Strategic Policy Advisor for the Office of the Attorney General, Mogadishu. I have had the privilege to undertake the ToT training under the auspices of the AML-CFT Project, for which I obtained Silver certification.



The AML-CFT training helped me to boost my professional capacity in addressing AML/CFT-related matters and gave me tools on how to impart similar knowledge to others. In that regard, I have assisted prosecutors in the investigation of AML/CFT matters as well as shared the knowledge gained during the training with fellow colleagues. I have been able to apply a multi-agency approach when handling AML/CFT matters by working closely with several institutions dealing with transnational crimes, as well as by liaising with governments in Africa and Europe.

I have recently gone through a virtual Refresher and Upgrading ToT training programme under the auspices of the AML-THB Project. Through this refresher, I anticipate upgrading from Silver to Gold certification and becoming part of the regional pool of in-house trainers.

This training was unique as I was able to connect with my counterparts in the region and form extremely useful networks that will bolster my professional undertakings. I believe that, as a result of this networking platform, relevant institutions within the Greater Horn of Africa will coordinate and cooperate more effectively in their investigation of transnational AM/CFT/THB crimes and bring human traffickers to justice.

### Herbert Mulumba

I am a police investigator from Kampala, Uganda. For the past 15 years, I have conducted investigations into fraud-related cases, including money laundering, under the Directorate of Criminal Investigations (Anti-Corruption Division).



Firstly, the AML/CFT ToT training helped me to gain confidence in facilitation/teaching AML/CFT-related topics and, at the same time, improved my investigative skills. I have grown professionally in the way I execute my duties, and am better than I was before the training. Secondly, I now have a big pool of colleagues across the region that I can contact if I am faced with an investigative challenge or if I need information to support an investigation.

The ongoing refresher AML-THB Project training is yet another opportunity for me to upgrade to a Gold certificate and at the same time to acquire knowledge and skills in the investigation of human trafficking in this region. To improve my performance, I intend to utilise and apply my acquired knowledge and skills in AML/THB by sharing information among different stakeholders both locally and regionally, and, when the opportunity arises, by using the available e-learning technology to train work colleagues on topics related to AML/CFT and AML/THB. I am optimistic that the AML-THB Project will provide further opportunities for participants to share their ToT skills with colleagues within the Greater Horn of Africa region by organising similar training programmes.



## CONTACTS

EUTF Project Team Leader/Directeur Projet: *Frédéric Bayard* | E-mail: [fbayard@aml-thb.eu](mailto:fbayard@aml-thb.eu)

Project Manager: *Federico Argentino* | E-mail: [fargentino@aml-thb.eu](mailto:fargentino@aml-thb.eu)

[info@aml-thb.eu](mailto:info@aml-thb.eu)