

## ANTI MONEY LAUNDERING COURSES

Country/Region	Website	Course provider (s)	Course and Summary of Content	Length of Course, Cost
UK	Institute of Chartered Accountants in England and Wales ( <a href="http://www.icaew.co.uk">www.icaew.co.uk</a> ) Refer to Course Providers under the Library & Information service page	Numerous such as the British Bankers Association; Institute of Chartered Secretaries and Administrators	The Institute of Chartered Accountants in England and Wales have recommended relevant courses on money laundering.  Courses recommended range from the impact of the Money laundering regulations on insolvency to courses focusing on the money laundering regulations in place.	Refer to website
UK	<a href="http://www.bbae-learning.com">www.bbae-learning.com</a>	<b>British Bankers Association in association with Absolutely Training Ltd</b>  The British Bankers' Association Pinners Hall 105-108, Old Broad Street GB - LONDON EC2N 1EX Tel: +44.2072168800 Fax: +44.2072168811	<b><u>Training for the prevention of Money Laundering(Accountants Module)</u></b> The training is targeted at accountants and covers: <ul style="list-style-type: none"> <li>▪ An Overview of Money Laundering</li> <li>▪ Understanding what money laundering means</li> <li>▪ Basic principles of money laundering prevention</li> <li>▪ UK offences and penalties relating to money laundering</li> <li>▪ Underpayments of tax· The role of the FSA</li> <li>▪ Establishing identity</li> <li>▪ The importance of knowing your customer</li> <li>▪ Recognising and reporting suspicious transactions</li> <li>▪ The role of the MLRO</li> <li>▪ The importance of record keeping</li> <li>▪ Specific issues for accountants</li> </ul>	The module takes 45 minutes to complete. For cost details refer to website.

UK	<a href="http://www.russelandassociates.co.uk">www.russelandassociates.co.uk</a>	Russell & Associates; 39 Woodside Park Road, London, N12 8RT, UK Tel: 020 8343 7072	<p><b><u>Money Laundering Avoidance Course</u></b></p> <ul style="list-style-type: none"> <li>▪ Definition of Money Laundering</li> <li>▪ Professions and organisations at risk</li> <li>▪ Regulation-domestic and international.</li> <li>▪ The legal background; penalties and remedies</li> <li>▪ Responsibilities of banks and individuals</li> <li>▪ Identification techniques</li> <li>▪ What to do, what not to do- some practical examples</li> <li>▪ Setting up monitoring procedures</li> </ul>	1 day course  For cost details refer to course provider.
Europe, UK	<a href="http://www.mlro.com">www.mlro.com</a>	<p><b>Money Laundering Resource</b></p> <p>Compliance Training Products Ltd 15 Newmarket Road Cambridge CB5 8EG</p> <p>Tel: (0) 1223 310222 Fax: (0) 1223 310200</p>	<p>Money Laundering Resource provides a range of training materials on anti money laundering. The training materials come in the form of interactive CD_ROMs, videos, DVD complete with Trainers Guide. Some of the training offered specifically for accountants are:</p> <p><b>1. <u>New E-Learning Programme for Accountants</u></b></p> <p>The interactive course covers:</p> <ul style="list-style-type: none"> <li>▪ Background of the money laundering process</li> <li>▪ Obligations arising from the law and the 2003 Regulations</li> <li>▪ Responsibilities of firms and individuals</li> <li>▪ Principles of 'Know Your Client' and</li> </ul>	Refer to website.

			<p>the use of client information</p> <ul style="list-style-type: none"> <li>▪ Recognition and reporting of suspicious activity -- with illustrative examples from accountants' business</li> <li>▪ The reporting and investigation process</li> </ul> <p><b>2. <u>Money on the Move</u></b></p> <p>Video film complete with Trainer's Guide and a starter pack of Staff Compliance Booklets. Key questions covered by the video are:</p> <ul style="list-style-type: none"> <li>▪ What is money laundering, who does it, why, and how?</li> <li>▪ How do the laws and regulations affect my organisation, and me personally?</li> <li>▪ How should I recognise money laundering in my own business, firm, or institution?</li> <li>▪ What must I do to fulfil my personal obligations?</li> <li>▪ What are the consequences if I don't, and the benefits when I do?</li> </ul>	
UK	<a href="http://www.mha-consulting.co.uk">www.mha-consulting.co.uk</a>	<p><b>MHA Consulting</b></p> <p>For further information about MHA's products and services please either call or email Michael Hyland,</p>	<p>The firm specializes in providing consulting services and training on anti money laundering and other financial crime.</p> <p>MHA has designed and delivered various anti money laundering training for clients such as</p>	

		<p>below.  <a href="mailto:m.hyland@mhagroup.co.uk">m.hyland@mhagroup.co.uk</a></p> <p>MHA  The Stonemasons  Broughton Hall  Skipton  BD23 3AE  Tel: 01756700091  Fax: 10756700091</p>	<p>British Bankers Association, Association of chartered Certified Accountants and numerous overseas government agencies and regulatory bodies such as the Reserve Bank of South Africa, Central Bank of Colombia.</p> <p>The trainings are classroom and video e-earning and video steam training based.</p>	
<p>UK, South Africa, Switzerland, Jersey, Isle of Man, Hong Kong, Guernsey, Cayman Islands, British Virgin Isles, Bermuda, Barbados &amp; Eastern Caribbean, Bahamas. Latin America, Argentina, Brazil, Ecuador , Colombia,</p>	<p><a href="http://www.int-comp.org">www.int-comp.org</a>  Refer to Training page.</p>	<p><b>International Compliance Association</b></p> <p>ICA Registrar  International Compliance Association  Wrens Court  52-54 Victoria Road  Sutton Coldfield  Birmingham  B72 1SX  England  .  <b>E-mail:</b> <a href="mailto:ica@int-comp.org">ica@int-comp.org</a>  <b>Training and Courses,</b>  <b>telephone:</b> (00 44) (0) 121 362 7501  <b>E-mail:</b> <a href="mailto:ict@int-comp.com">ict@int-comp.com</a>  <b>Fax:</b> (00 44) (0) 121 240 3002</p>	<p>The ICA is a professional organization whose aim is to promote compliance and anti money laundering practice in the financial services sector. The ICA seeks to achieve this aim by providing internationally recognized qualifications and training.</p> <p>The ICA offers Certificate and Diploma courses on compliance and anti money laundering in UK and various other countries. The courses are offered through distance learning and exams can be taken in any county in the world. The Certificates and Diplomas are awarded in association with the University of Manchester Business School and the British Bankers Association.</p> <p>The ICA also offers a series of compliance and anti money laundering seminars for members. In 2005, the ICA has planned for 10 such seminars. All seminars are offered in London.</p>	<p><u>Course fees and duration</u>  For further details on the cost and timing of the Certificate and Diploma courses refer to the website.</p> <p><u>Seminar fees and duration</u>  Student members and members £35 (plus VAT) or buy a 10 seminar ticket for the entire series at only £275 (plus VAT).</p> <p>Non-ICA members</p>

				<p>£60 (plus VAT) per session or buy a 10 seminar ticket for the entire series at only £400 (plus VAT)</p> <p>The seminar runs for 1.5hours and are conducted in the evenings.</p>
UK	<p><a href="http://www.swat.ltd.uk">www.swat.ltd.uk</a></p> <p>Refer to Training page.</p>	<p><b>SWAT Ltd</b>  Tor View House  3 Darklake View  Estover  Plymouth  PL6 7TL  Tel: 01752 725 700</p>	<p><b><u>Money Laundering: Introductory Training</u></b>  The training deals with how to recognize and deal with transactions that may be related to money laundering. Topics covered include:  What is money laundering; Part 7 of the Proceeds of Crime Act 2002; The Terrorism Act 2000; Recognizing and dealing with suspicious transactions.</p> <p><b><u>Money Laundering Training CD</u></b>  The course will include:</p> <ul style="list-style-type: none"> <li>▪ a copy of the final Money Laundering Regulations 2003.</li> <li>▪ the money laundering sections of the revised Proceeds of Crime Act 2002</li> <li>▪ an explanation of the new rules, as set out in the 2003 Money Laundering Regulations</li> <li>▪ the money laundering sections of the</li> </ul>	<p>The Introductory course runs for half a day.</p> <p>The money laundering CD takes about one hour to complete, including reviewing the</p>

			<p>revised Terrorism Act 2000</p> <ul style="list-style-type: none"> <li>▪ guidance from the ICAEW</li> <li>▪ guidance from the Law Society and the Royal Institution of Chartered Surveyors (subject to these bodies announcing their own guidelines prior to the deadline for completion of the CD)</li> <li>▪ detailed course notes, which are a written version of the new rules</li> <li>▪ practical forms and checklists to assist you in implementing money laundering prevention procedures within your organisation</li> </ul> <p>Users are then able to print a certificate from the CD, which can be used as evidence of money laundering training</p>	<p>course notes and the supporting documentation.</p> <p>SWAT's Money Laundering - Essential Training and Documentation CD costs just £75 + VAT (£60 + VAT for SWAT members; £68 + VAT for SPSS members),</p> <p>For further information contact SWAT directly on 01752 725700.</p>
--	--	--	---	---

Country/Region	Website	Course provider	Name of Course & Content	Length of Course, Cost and Registration
USA. Russia South America Africa Middle Eastern countries	<a href="http://www.fletc.gov/cfi/TrainingPrograms">www.fletc.gov/cfi/TrainingPrograms</a>	Federal Law Enforcement Training Center- Computer and Financial Investigations Division  <i>(Under the US Department of Homeland Security)</i>	<ol style="list-style-type: none"> <li>1. <b><u>International Banking &amp; Money Laundering Training Program</u></b> <ul style="list-style-type: none"> <li>▪ Bank Secrecy Act &amp; Money Laundering Statutes;</li> <li>▪ International Money Movement;</li> <li>▪ International Money Laundering (schemes relating to Columbia; Caribbean; Mexico; Canada; Western Europe );</li> <li>▪ Methods and Techniques of Money Laundering;</li> <li>▪ Regulations and Treaties;</li> <li>▪ Asset Forfeiture;</li> <li>▪ A Prosecutor’s view of money laundering;</li> <li>▪ money laundering &amp; terrorism.</li> </ul> </li>   <li>2. <b><u>Money Laundering &amp; Asset Forfeiture Training Program</u></b> <ul style="list-style-type: none"> <li>▪ Identifying money laundering targets</li> <li>▪ Review of the Bank Secrecy Act and US Patriot Act</li> <li>▪ Analysis of the Money Laundering Control Act statutes and their application to a simulated investigation</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. <u>International Banking &amp; Money laundering</u>            Program runs for 1 week (37 hours)</li>   <li>2. <u>Money Laundering and Asset Forfeiture training program</u>            Program runs for 4 and a half days.             For further information on the content and cost refer to the course provider.</li> </ol>

			<ul style="list-style-type: none"> <li>▪ Investigative techniques and evidentiary requirements necessary to prove the Elements of common money laundering and asset forfeiture investigations</li> <li>▪ The fundamentals of Asset Forfeiture and Tracing of Funds</li> <li>▪ Use of computer to organize, analyse and present large volumes of financial evidence</li> <li>▪ Overview of trade based money laundering and Hawalas</li> <li>▪ Introduction to Forensic Accounting Techniques and methods of isolating criminally derived proceeds from commingled legitimate source proceeds.</li> <li>▪</li> </ul>	
East Asia and Pacific	<a href="http://www.unodc.org/unodc/en/money_laundrying.html">www.unodc.org/unodc/en/money_laundrying.html</a>	United Nations Office on Drugs and Crime ( Global Programme against Money Laundering)	<p>The UNODC Global Programme against Money Laundering as part of its strategy organizes trainings on money laundering and provides training materials on the subject.</p> <p>The UNODC has produced a CD_ Rom training tool on Money Laundering, which is interaction based.</p> <p>The lessons included in the CD_ROM range from the basics of money laundering, to other issues such as money laundering haven, financial investigations, undercover operations and financial interviewing.</p>	



Asia and Pacific	<a href="http://www.apgml.org/training/">www.apgml.org/training/</a>	<p>Asia Pacific Group on Money Laundering (APG)  <a href="http://www.apgml.org">www.apgml.org</a></p> <p>Asia Pacific Group on Money Laundering Secretariat  110 Goulburn Street  Sydney, NSW 2000,  Australia  Tel: (612) 9286 4383  Fax: (612) 9286 4393</p>	<p>The Asia Pacific Group on Money Laundering provides training to its members. The provision of technical assistance and training is one of its purposes under its Terms of Reference. Its website describes major training projects that it is undertaking in the Asia and Pacific region.</p>	Refer to website
Caribbean and South America	<a href="http://www.cfatf.org/training/">www.cfatf.org/training/</a>	<p>Caribbean Financial Action Taskforce</p> <p>Sackville House  35-37 Sackville street  Port of Spain  Trinidad W.I.  Tel: (868) 623 9667  Fax: (868) 624 1297</p>	<p>The Caribbean Financial Action Taskforce organizes trainings and seminars on money laundering for its thirty member countries.</p> <p>It has also arranged for ongoing training for its eight Spanish speaking members on money laundering. Topics covered include:</p> <ul style="list-style-type: none"> <li>▪ Transfer of funds overseas in the area of prevention of money laundering and terrorist financing; risks in the use of cross board cash transfers.</li> <li>▪ Transparency and 'know your client' in associations, corporate groups and other legal entities.</li> <li>▪ Enhancement of the mechanisms used in the struggle against terrorist financing.</li> <li>▪ Legal Framework in Money Laundering.</li> </ul>	

			<ul style="list-style-type: none"><li>▪ Growth of on site inspections of the measures implemented against money laundering and terrorist financing.</li></ul>	
--	--	--	---	--



## **REPORT ON TASK ALLOCATED- AUDITOR GENERALS OFFICE(FIJI)**

### **Task Objective**

The objective of the task allocated to the Fiji Audit Office to research and identify what types of training programs on money laundering is currently available out there in the private and public sector and to determine whether these may be relevant to the SAIs needs. We were to inform the Secretariat on the extent to which existing training programs cover the issues of:

1. Types of financial abuse: money laundering
2. Money laundering techniques
3. Money laundering typologies
4. Control procedure for the money laundering prevention system
5. Forty eight recommendations of FATF
6. Electronic money laundering
7. Supervision of financial institutions
8. Audit of the government's strategy to fight money laundering
9. Investigative techniques and intelligent sources to gather evidence against money launders
10. Financial intelligence unit

### **Findings**

Listed in the above table are courses related to anti money laundering. The training courses identified above focused on explaining concepts on money laundering, techniques of money laundering and legislative requirements, whether local or international, in place relating to money laundering.

Most of the courses are targeted at employees of financial institutions who are obligated under the respective countries anti money laundering legislations to monitor and report on suspected money laundering transactions. The courses identified do cover adequately important concepts that auditors need to be aware of regarding money laundering such as:

11. Types of financial abuse: money laundering
12. Money laundering techniques
13. Money laundering typologies
14. Control procedure for the money laundering prevention system
15. Electronic money laundering

However the courses are not specifically targeting government auditors thus they do not cover important issues like how government auditors can audit a government's strategy to fight money laundering or how anti money laundering audit tests can be included in our normal audits. The courses do not specifically cover the following key issues which are relevant to SAIs:

1. Supervision of financial institutions
2. Audit of the government's strategy to fight money laundering
3. Investigative techniques and intelligent sources to gather evidence against money launders
4. Financial intelligence unit

I also noted that the courses on Anti Money Laundering (AML) are concentrated only in developed countries or regions such as Europe and USA. Some regions such as the Pacific, Caribbean, Middle East did not have AML courses readily available to them.

### **Conclusion**

Based on this I would recommend that the Taskforce considers the option of developing its own course on anti money laundering specific to the role of SAIs and adequately covering the above four points.

The IDI is currently exploring the development of electronic courses which can be made available through the internet. The Taskforce may consider requesting IDI to develop an electronic course on anti money laundering which could then be made available on the Taskforce website. Thus the course will be easily accessible by members of INTOSAI. For those developing SAIs which do not have easy access to the internet, this course can be made available through CD roms for delivery on stand alone computers. Having an electronic course would ensure easy access to the course by SAIs in the different regions. It will also enable the Taskforce and IDI to easily update the course content in line with developments in the course subject.

Caroline Pickering  
Auditor Generals Office -Fiji