



INCEPTION REPORT

Project Title:	Project Against Money Laundering	
Project Number:	MOLI-RU	
Country:	Russian Federation	
	Local operator	EC Consultant
Name:	Financial Monitoring Committee	Council of Europe Economic Crime
Dept		
Address:	Myasnitskaya Ul, 39 107450-Moscow	Strasbourg
Tel. number:	+7 095 927 3365	+33 3 9021 4506
Fax number:	+7 095 927 3219	+33 3 8841 3955
Email:	kfm@kfm.ru	alexander.seger@coe.int
Contact person:	Mr S Osipov	Mr A Seger
Signature:	_____	

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Author of report: Simon Goddard – Project Team Leader

EC M & E team	_____	_____	
	[name]	[signature]	[date]
EC Delegation	_____	_____	
	[name]	[signature]	[date]
TACIS Bureau	_____	_____	
[task manager]	[name]	[signature]	[date]

Contents

2.4	The Beneficiary Organisations	7
2.4.1	The Financial Monitoring Committee	7
2.4.2	Financial Institutions and Supervisory Authorities	7
2.4.4	General Prosecutor's Office and Judiciary	8
2.5	Responsibilities of the Beneficiary Organisations	8
2.6	Communication within the Anti Money Laundering Project	9
3.1	INTRODUCTION	9
3.1.1	Module 1 - Workshops on Legal and Policy Development	10
3.1.2	Module 2 - Developing procedures on monitoring compliance, feedback and supply of information by the FIU to the partners in the anti-money laundering chain.	11
3.1.3	Module 3 - Training employees of reporting institutions and professionals and their supervisory bodies	11
3.1.4	Module 4 - Financial Analysis and computer-based training in the FIU and law enforcement	11
3.1.5	Module 5 - Workshops directed on public prosecutors and judges	12
3.1.6	Module 6 - Train the Trainers	12
3.1.7	Module 7 - International co-operation	13
3.1.8	Module 8 - Feasibility study and proposals for a follow-up project	14
3.1.9	Module 9 - Improving law enforcement activity after dissemination of transactions by the KFM (Improving follow-up).	14
4.	The Activities	16
4.1.1	The Opening Conference	16
4.1.2	Consortium Pre-Meeting	17
4.1.3	Consortium Meeting	19
4.1.4	Consortium Meeting	20
4.1.5	Missions by the Project Team / Consortium	21
4.1.6	Missions by the Project Team / Consortium	23
4.1.7	Missions by the Project Team / Consortium	24
4.1.8	Legal and Policy Development	25
4.1.9	Legal and Policy Development	26
4.1.10	Legal and Policy Development	27
4.1.11	Developing Procedures for Monitoring Compliance and Feedback	29
4.1.12	Bankers Course	32
4.1.13	Training for Analysts	34
4.1.14	Awareness raising workshop for prosecutors and judges	35
4.1.15	Awareness raising workshop for prosecutors and judges	37
4.1.16	Awareness raising workshop for prosecutors and judges	38
4.1.17	Train the Trainers	40
4.1.18	International co-operation and the exchange of financial information / intelligence	42
4.1.19	Feasibility study and proposal for follow-up project	44
4.1.20	Improving Inter-Agency Co-operation	45
4.1.21	Annual Typologies Meeting	47
4.1.22	Closing Conference	47
4.1.23	Targeted Study Visits / Internships	49
4.2	The development of a computer based-training-tool - background and functionality	49

4.2.1	Introduction - the form of the computer-based training	49
4.2.2	Efficiency	49
4.2.3	Effectiveness	49
4.2.4	Computer-based training and 'Train the Trainers'	50
4.2.5	Efficiency	50
4.2.6	Effectiveness	50
4.2.7	Computer based training and the Analyst Training	50
4.2.8	Efficiency	50
4.2.9	Effectiveness	50
5.	ANCILLARY MATTERS	51
5.1	Cash Flow Forecast	51
6.	ANNEXES	51
	Work plan and inputs	52

1. PROJECT SYNOPSIS

Project Title:	Project Against Money Laundering
Project Number:	MOLI-RU
Country:	Russian Federation

Project objective: To strengthen the capacity of the anti-money laundering system established in the Russian Federation, in full compliance with European and international standards.

Planned outputs:

1. Strengthening the Financial Monitoring Committee (KFM) to enable it to exercise its functions in accordance with relevant regulations
2. Enhancing the capacities of the criminal justice system to cooperate with the KFM within the anti-money laundering system
3. Supporting the financial sectors and other bodies required to report to help them meet their obligations in the prevention of money laundering and their cooperation with the KFM.

Project activities:

1. Assistance with legal and policy development at a national level
2. Development of procedures for monitoring compliance and feedback by and to the KFM
3. Training for employees of reporting institutions and their supervisory bodies
4. Financial analysis and computer-based training for the KFM and law enforcement partners
5. Workshops directed at prosecutors and judges
6. Training of trainers within the KFM and law enforcement partners
7. Improving international co-operation by the KFM
8. Undertaking a feasibility study and proposals for a follow-up project
9. Improving inter-agency co-operation between the KFM and law enforcement

Project starting date: 23 December 2002

Project duration: 30 months [1 February 2003 – 31 July 2005]

2. ANALYSIS OF PROJECT

2.1 Background

The project will involve a range of different institutions and activities. In order to ensure coherence the project will be managed by a single principal international organisation, namely the Council of Europe, in cooperation with a single principal Russian project partner, namely the Committee for Financial Monitoring [KFM]. They will ensure that activities are carried out and that other cooperating agencies and partners as required provide inputs. The tasks of the KFM include:

- Collecting, processing and analysing information on the monetary and other transactions with property subject to surveillance in pursue to the legislation of the Russian Federation
- Building a universal information system and managing a federal database in the field of counteracting legalisation (money laundering) of criminally earned income
- Forwarding of relevant information to the law and order agencies within their competence and availability of sufficient evidence that a deal or transaction are associated with the legalization (money laundering) of criminally earned income
- Pursuance of international agreements of the Russian Federation on interaction and information exchange with competent agencies of foreign countries in the field of counteracting legalisation (money laundering) of criminally earned income
- Presentation of the Russian Federation in international organisations with regard to counteracting legalisation (money laundering) of criminally earned income.

The KFM currently has some 160 staff. It is expected that its staffing will be built up to 200 in the HQs in Moscow. In addition, some 105 staff are to be located in regional offices at the level of the seven federal districts. These regional offices are to monitor the follow up by law enforcement bodies to reports received from the KFM, to coordinate the anti-money laundering work of institutions at regional levels and to organise training activities. (They are not involved in sending or receiving reports on financial transactions). The First Deputy Minister of Finance of the Russian Federation, assisted by a First Deputy Chairman and three Deputy Chairmen, heads the KFM. Under its current organigram it contains eight departments. Since its formation, great attention has been paid to the creation of the technical infrastructure for the processing and storage of large amounts of data. However, the analytical capability, including software, requires strengthening.

While the KFM plays a central role in the prevention and control of money laundering, the role of other institutions is equally crucial. Controls and supervision of credit institutions are exercised by the Bank of Russia, of the securities market by the Federal Securities Market Commission, of insurance companies by the Insurance Surveillance Department of the Ministry of Finance, of post and telegraph offices by

the Ministry of Telecommunications (while leasing and pawn shops are monitored by the KFM).

The Ministry of Interior, in order to create the necessary capacities for the implementation of Law no 115-FZ, has established a special division on money laundering within the General Department for Combating Economic Crime of the Service of Criminal Militia (police). Its tasks include the verification of information from the KFM. The Federal Security Service of Russia, among other things, is combating organised crime, corruption and terrorism, and thus also money laundering. Coordination and cooperation with these bodies thus poses a major challenge to the KFM. There are still some concerns about the newly established KFM, in particular with respect to its mandate, co-ordination with other government agencies and with the private sector, and its budget allocation.

The Law sets out a specific list of organisations which, being in charge of executing transactions with cash or other assets, will be responsible for complying with the compulsory checks foreseen by the law. These organisations are: banks and other lending institutions, professionals participants in the security markets, insurance and leasing companies, mail, telegraph and other non-lending institutions carrying out cash transfers, pawnshops. According to the law, the Central Bank of Russia will supply the KFM with information and documents required to perform its tasks, in compliance with a procedure to be agreed between the Agency and the Central Bank. It will be important that this the financial institutions concerned understand procedure and that it functions in an efficient and prompt manner in order to effectively detect and report suspicious financial flows. Following the adoption of legislation and the creation of the KFM, Russia was removed from the list of non-co-operative countries established by the Financial Action Task Force (FATF) in October 2002. In June 2002, the Russian Federation became a member of the Egmont Group.

This project is the first of its kind in the Russian Federation supporting the Committee for Financial Monitoring. The overall focus of the project is thus on advice and in country and international training. The largest part of the inputs will thus be allocated for long- and short-term advisers, and training events (including study visits and internships abroad). The deployment of long-term advisers based in Moscow is considered necessary in order to ensure that all the activities are carried out in a coordinated manner and within the time period available for this project. An important consideration furthermore is that the present project may create the basis for future assistance to the anti-money laundering effort in the Russian Federation

2.2 The Project Team

The Project Team is based in Moscow and is located in the same building as the KFM Moscow Regional Office. The Economic Crime Division, Directorate General of Legal Affairs, Council of Europe, Strasbourg supports the Project Team.

The Project Team is responsible for, inter alia:

- Co-coordinating the activities of the consortium members;
- Acting as contact for Consortium, Commission and beneficiary country;
- Identifying and communicating with the National Contact Person in the beneficiary country;
- Identifying and mobilising the experts / Consortium members;
- Planning the training activities in co-ordination with the Consortium and the beneficiary country;
- Arranging all administrative and logistical matters related to the Project;
- Organising all training activities and Consortium meetings;

- Gathering information on needs and wishes of the beneficiary country;
- Writing all necessary reports for the Commission;
- Maintaining financial transparency towards Commission and Consortium;
- Assisting consortium members and experts in their specific tasks for this Project.

2.3 The Consortium

A consortium of experts in the field of anti money laundering activities has been identified who are willing to assist in the execution of the activities. The members of the Consortium are:

1. CTIF-CFI (Belgium)	Mr Verhelst, Deputy Director
2. NCIS/ECU (UK)	Mr Blezzard, Dep.Head of the Economic Cr. Unit
3. TRACFIN (France)	Ms Schoonwater, Magistrate
4. MF-OMLP (Slovenia)	Mr Stroligo, Director
5. UIC (Italy)	Mr De Pasquale, Leading Advocate
6. Luxembourg	Mr Kamphaus, Leading Advocate
7. External Expert (Switzerland)	Mr. Mark Van Thiel
8. External Expert (Sweden)	Mr Anders Cedhagen

The Consortium members are responsible for the following tasks:

- Taking care of at least one training activity (only the content of the activity);
- Informing (in writing) the project team on the planned activity;
- Giving specific input for the different reports for the Commission;
- Attending the Consortium meetings and Steering Group meetings;
- Where needed, advising individual organisations within the beneficiary country concerning specific problems;
- Identifying and mobilising national experts for training activities.

2.4 The Beneficiary Organisations

2.4.1 The Financial Monitoring Committee

The Financial Monitoring Committee of the Russian Federation [Komitet Finansovogo Monitoringa] KFM will function as the project partner, that is, the primary beneficiary organisation. This organisation will be also responsible for assisting in the implementation of the project and particularly for co-ordination of activities with other beneficiary organisations within the anti money-laundering chain. The Chairman of the KFM will appoint a senior KFM official to the role of Project Director.

Secondary beneficiary organisations within the Russian Federation include, inter alia:

2.4.2 Financial Institutions and Supervisory Authorities

Although the list of institutions required to report financial transactions to the KFM may not yet be complete (an enlargement of the list is presently under consideration by the Duma), it already contains some 2500 credit institutions and providers of

financial services. As the financial sector may not yet be fully aware of the importance in dealing with the money laundering issue, and of the consequences for non-compliance with reporting obligations it is important that the KFM together with the supervisory authorities provide guidance and training to the financial sector viz.;

Supervisory institutions need to be trained in how to verify the efficacy of the anti-money laundering structures and procedures and how to ensure compliance.

The financial sector institutions need to receive practical guidance and training in meeting reporting obligations and in identifying suspicious transactions.

2.4.3 Law Enforcement Agencies

These include the Ministry of Interior [General Department for Combating Economic Crime of the Service of Criminal Militia], the Ministry of Interior various [police] training academies, and with the Federal Security Service [special section for dealing with organised crime, corruption, terrorism, and money laundering]. In addition, where the development of the response to money laundering by the Russian authorities includes the establishment of new law enforcement entities, or the expansion of responsibilities of existing entities, those organisations will also be included in project activities.

2.4.4 General Prosecutor's Office and Judiciary

The investigation and prosecution of money laundering and predicate offences, including the tracing, search, seizure and confiscation of proceeds from crime are considered difficult in most countries. In the Russian Federation, the introduction of new legislation on money laundering poses major challenges to law enforcement agencies and the criminal justice system in general. The ongoing legal and judicial reform process redefining the interaction between the judiciary, the prosecution and law enforcement bodies further compounds this. Consequently prosecutors, judges and judicial services need to be provided with a more comprehensive understanding of the structure and processes of the State's response to money laundering and the provisional measures that may have to be taken e.g. monitoring of bank accounts, obtaining international assistance, seizure and confiscation of assets.

2.5 Responsibilities of the Beneficiary Organisations

For optimal communication between the Project Team, the Consortium members and/or experts and the beneficiary organisations it is important that the Contact Persons in the beneficiary organisations take some responsibilities regarding co-ordination and communication at a national level. The Contact Persons (often in close co-operation with the Project Team Leader) will ideally undertake the following tasks:

- Inform the Project Team on trends and developments in the area of anti-money laundering such as the legal and administrative situation in the beneficiary country.
- Share technical information with the Project Team.
- Contribute to the organisation of project activities and assist in practical arrangements in country.
- Advise the Project Team Leader in the identification and selection of participants in the activities.

- Liaise with the Council of Europe Economic Crime Division, Directorate General for Legal Affairs, Strasbourg.
- Assist with the incorporation of the recommendations of the project into the appropriate national strategies of the beneficiary country.

2.6 Communication within the Anti Money Laundering Project

In principle the Project Team Leader is responsible for the daily communication between on the one hand the members of the consortium and their experts, and on the other hand the beneficiary country. Furthermore it is his task to broaden the personal network for the Project. The Project Team Leader will maintain regular communication with the European Commission Delegation in Moscow and the EuropeAid task manager in Brussels. All written reports required by the European Commission under this project will be channeled through the Secretariat of the Council of Europe in Strasbourg.

The Training Advisor of the Project Team will give support to the Project Team Leader, Consortium Members, and other experts who are carrying out training activities. He will liaise with them where desirable. Furthermore he will carry out fact-finding missions within the beneficiary country in order to obtain an optimal view on the training need of the various organisations in the anti money-laundering chain. For that purpose he will be in close contact with the National Contact Person. The Project Team Leader will accompany him on his missions, where possible and where appropriate.

The Financial Manager is responsible for the financial transparency of the Project. S/He communicates with the Council of Europe Secretariat and the beneficiary country about the financial aspects of the Project. In addition s/he monitors the Project concerning the compliance of the (financial) rules and procedures of the Council of Europe.

The Project Team Leader will keep the strategic overview on the Project. He is responsible for the quality check on the execution of the activities and on the periodical reports. Furthermore he will monitor the activities of the Project Team and the Consortium. He will manage the Project Team in its daily activities, and he will report to the Director General of Legal Affairs in Strasbourg and the Project Director appointed by the KFM in Moscow.

3. PROJECT PLANNING

3.1 INTRODUCTION

In view of the central role of the Committee for Financial Monitoring, all project activities will be carried out in co-operation with the KFM, including those activities aimed at strengthening the capacities of the law enforcement and criminal justice system and those aimed at the financial sector. All regional offices of the KFM will be involved in the project [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. In order to ensure the participation of parties concerned, a start-up workshop will be organised within two months of the beginning of the project. The project is aimed at building capacities and the primary

tool to this effect is information and training. The project will thus focus on the development of training materials and practical guidelines, as well as on the training of trainers.

The activities designed to achieve the objectives of the project as depicted within the Terms of Reference have been rationalised and placed within specific modules as follows:

- Legal and policy development
- Developing procedures on monitoring compliance, feedback and supply by the KFM to the partners in the anti-money laundering chain
- Training for employees of reporting institutions and professionals and their supervisory bodies
- Financial analysis and computer-based training for the KFM and law enforcement partners
- Workshops directed at prosecutors and judges
- Training of personnel to perform the role of trainer within the organisations within the anti-money laundering chain
- International co-operation
- Feasibility study and proposals for a follow-up project
- Improving inter-agency co-operation between the KFM and law enforcement

This Modular Approach enables all the objectives of the Project to be addressed in a variety of formats and provides for the allocation of responsibilities within the Consortium members to be managed more effectively by the project team. Furthermore, this method provides clear action plans for achievement of each of the objectives within a designated timescale that are specific, measurable, achievable, and realistic. Expert human resources are a valuable commodity and the budget for this Project must be allocated with the clear objective of obtaining value for money. This approach enables the Project Team to manage the input of the external experts against the budget for each activity in a more efficient and transparent manner and to ensure that important objective is achieved.

The Work Programme outputs as described in the Terms of Reference and the individual Modules that support them are depicted.

3.1.1 Module 1 - Workshops on Legal and Policy Development

[Supported Output: 1.4]

Assistance will be provided to review existing legislation and regulations to achieve full compliance with the European and international standards. In addition assistance will be provided to draft proposals for amendments and awareness will be created on further upcoming legal developments.

The outcome of the workshops will be to make an overview of the legal framework of the beneficiary country and to propose concrete measures for legal improvements that are needed.

These workshops should include all target groups with a special focus on those who are responsible for drafting legislation, where appropriate.

Note: It is expected that the legal experts of the Consortium will firmly oppose against using the word assessment. The Project has as its main objective that of supporting the beneficiary country and not evaluating it.

3.1.2 Module 2 - Developing procedures on monitoring compliance, feedback and supply of information by the FIU to the partners in the anti-money laundering chain.

[Supported Outputs: 1.1 / 1.3 / 3.1 / 3.2]

This module will be dealt with by way of workshops and seminars. Seminars will cover the following topics: tactical analysis and sources of information, strategic analysis, information technology improvement, data security, data protection, internal management, unexplored financial products, new types of crime, new criminal groups. These topics will be handled with the focus on the internal organisation of the FIU [KFM].

The target group of these activities is the KFM. As an outcome, the KFM will be able to structure its activities in a better way. It will produce standardised procedures on monitoring compliance, financial analysis, supplying information to enforcement authorities, providing feedback to partners in the chain, etc.

Note: This activity is not designed as technical training on the above-mentioned topics, but rather management training on structuring the contacts within the anti-money laundering chain.

3.1.3 Module 3 - Training employees of reporting institutions and professionals and their supervisory bodies

[Supported Outputs: 3.1 / 3.2]

The target groups of this block of activities are personnel in the reporting institutions and / or compliance officers and representatives of supervising institutions. The activity will help the participants to reach a better understanding of money laundering schemes and will lead to a better quality of reported transactions. The participants will be informed about their reporting obligations.

This training can be achieved by delivering a course that has been developed by Luxembourg's financial sector. Although originally meant for compliance officers it is also important that supervisory authorities gain more knowledge about the importance of good compliance. Therefore, it is also useful that supervisors also participate in this training.

3.1.4 Module 4 - Financial Analysis and computer-based training in the FIU and law enforcement

[Supported Outputs: 1.1 / 1.2]

This module involves the delivery of a financial analytical product. It is intended that part of this activity will be executed in the form of a computer-based training, which makes it possible for the participants to easily transfer their new knowledge within their own country. By means of this technical assistance it will improve the target group's capacities in financial analysis and financial investigation.

This module will help to improve knowledge regarding the technical aspects of financial analysis, money laundering schemes and new type of crimes and crime groups. Those receiving this training will also have a better understanding of the financial information processed by the FIU. As a result, the investigator and analysts will know how to standardise the use of financial information.

Note: This training in its current format as supplied by the UK-NCIS is not specifically designed to train trainers. However by using the computer-based training it will be possible for the participants to promulgate their knowledge at a national level. The product may be translated into the language of the beneficiary country and supplied to the participants for distribution. During the course they learn how the tool works so that they can also share that (practical) knowledge to their colleagues and other stakeholders, like employees of financial institutions. This tool can thus be used as technical training and as an information tool for the financial institutions.

3.1.5 Module 5 - Workshops directed on public prosecutors and judges

[Supported Outputs: 1.3 / 1.4 / 2.1]

One target group of this block of activities are public prosecutors in the beneficiary country who should be trained to give a proper follow-up to the investigative functions of the KFM and appropriate law enforcement agencies. Another target group are judges, who will have to develop an understanding of the specific problems related to money laundering cases.

Note: This module is purely awareness raising. It is not possible to gather specifically assigned Public Prosecutors or judges, because in general they do not exist.

3.1.6 Module 6 - Train the Trainers

[Supported Outputs: 1.1 / 1.3 / 2.1]

A relatively small group of representatives from specified organisations within the beneficiary country will be instructed to give training at a national level. These representatives will receive all necessary training materials. This initiative provides the project with a particularly powerful, cost effective and sustainable methodology to achieve the improvement of effective co-operation along the whole chain of national anti-money laundering services. The aim of this training is to build on the student's background and experience by equipping them with the knowledge, understanding, skills, attitudes and behaviour needed to design a basic financial investigation course, and to create lesson plans and deliver the product to students utilising student centred training techniques. The basic financial investigators course equips the students with the following skills:

- Awareness of the applicable laws and process
- Case management skills ñ the recording of policy, decisions and actions
- Knowledge of financial institutions and processes
- Management of financial intelligence ñ sources, handling intelligence, risk assessments, confidentiality issues

Further modules can then be designed by the accredited trainer that contributes to the sustainability of the project. These further modules could cover the following issues:

- Confiscation
- Money laundering
- Senior officer awareness
- Analysis / high tech crime
- Advanced course
- Refresher training

The practical output will be that once the initial training under the Project is complete, persons working in the field of combating money laundering in the beneficiary country will be instructed in their own language by their own tutors. This means that also after this Project is finished, new employees in the different organisations in the anti-money laundering chain can be trained.

Note: It is very important that the KFM have access to any of the national training that has to be set up. As a consequence, whichever training institutions in the beneficiary country are selected to participate, their facilities should be accessible for students from any other organisation within the anti money-laundering chain.

3.1.7 Module 7 - International co-operation

[Supported Outputs: 1.1 / 1.5]

This module is designed to examine and discuss the practicalities and operational necessities of international information exchange between the beneficiary country and the countries of Central and Eastern Europe (CEECs), and with the EU.

For example, given that two of the primary concerns of international information exchange are the protection of the confidentiality of information and the modalities of exchange, issues that may be considered include:

- The impact of the introduction of FIU Net in the EU and its extension to the CEECs;
- The impact of CRIMORG 134;
- Reciprocity - how is it ensured and what information is exchanged;
- The exchange of information concerning the financing of terrorism;
- Understanding the limits of exchange in relation to domestic legislation, ECHR and data protection issues.

Improving international co-operation inevitably starts with the creation of Memoranda of Understanding between FIU 's and the KFM have a number of such agreements both with EU and CEEC countries. These agreements may not now or in the near future reflect the development of the individual FIUs or general crime situation, and may benefit from being re-examined.

In addition, the development of FIU Net within the EU and accession countries provides an opportunity for the KFM to improve both its analytical capabilities and its international co-operation if it were to also subscribe to the initiative. There are no technical reasons why this should not be possible and, given that some of the countries it most frequently shares information with will be members, support by the

Project for their participation should be considered. In co-operation with the KFM a feasibility study and budget projections will be undertaken.

3.1.8 Module 8 - Feasibility study and proposals for a follow-up project

[Supported Output: 1.6]

The current project is designed specifically to contribute to the establishment of a fully functioning system to prevent and control money laundering [in the Russian Federation] in accordance with European and international standards. Continual analysis and evaluation of the outputs and activities of the project will assist in determining whether and to what extent the overall and specific objectives have been met. The economic, social and legal environment within which the organisations in the anti money-laundering chain operate however is continually evolving. These factors require a robust but flexible response by those organisations to maintain their operational capabilities at the maximum level possible. It is therefore necessary to develop a good training philosophy within these organisations upon which policy and strategy can be decided.

It is therefore proposed that during the course of this project a full Training Need Analysis [TNA] within the KFM and MVD will be undertaken utilising an academically approved approach. This will include an extensive consultation process with all stakeholders in the anti money-laundering chain, as well as within the organisations themselves, with random sampling undertaken of between 10-20%. This will be conducted by a combination of methods including questionnaires and interviews. This process will clearly identify the difference between the existing level of training of the individuals and the needs of the organisations. As this process will begin during the life of this project it will be possible to utilise the contacts made by the project team during the various activities.

Once completed it will be possible to objectively assess the capabilities of the KFM and MVD in terms of skills and abilities and knowledge and understanding in combating financial crime and money laundering, and to make proposals for any future Project activity.

NOTE: It is intended that this module be undertaken by the Project Team in consultation with external experts

3.1.9 Module 9 - Improving law enforcement activity after dissemination of transactions by the KFM (Improving follow-up).

[Supported Output: 1.3]

Generally, even established Financial Intelligence Units [FIUs] are analysing only a small proportion of the suspicious transaction reports [STRs] they receive with a large majority remaining within the FIU database and not being used even as an intelligence resource by the police. There are a number of reasons for this which include inter alia: lack of resources; lack of knowledge; negative judgments being made on the basis of the results of initial data base checks within the FIU; legal or procedural difficulties for the FIUs to forward the STR to the police. In addition the FIU often takes too long to analyse and disseminate the STR that results in loss of opportunity for the police. There is a direct correlation between the length of time passed since the initial transaction and its operational usefulness to law enforcement. This issue is a major factor in the many cases involving those STRs that are forwarded to police as a case file but that do not result in prosecution. The age of

the STR is also a major factor preventing the intelligence value of the information from being extracted or maximised.

There are often legal, institutional and cultural barriers existing that prevent the integration of financial information into the criminal intelligence process. Indeed there may be no formalised criminal intelligence process with the police being purely a reactive enforcement tool. Research has shown that many FIUs do not appear to understand the value of the information that can be obtained from other police resources in the early stages of their investigations into an STR. There is often a general lack of understanding that the STR is just one piece of the overall picture. On its own the information may be fairly meaningless but together with all the other intelligence held, could provide the key to the detection of crime. This situation is believed to exist within the beneficiary country where the FIU is a newly established organisation.

In addition there is a great deal of difference between the investigation of economic crime and the use of financial investigation as an additional way to investigate organised crime. In organised crime investigations for example, financial investigation can indicate:

- The hierarchy of the organisation
- The size of the organisation
- The individual responsibilities of each member
- The particular expertise of each individual member.

Finally, there is little understanding within the police in general of the worth of financial information and of the need to have systems to obtain and manage such a resource. This applies as much to that information which comes from the 'top down', i.e., from the FIU, or from the 'bottom up', i.e., from the street level police officer.

This Module can be undertaken in the form of seminars. Each seminar would be of one-days duration with the objective being to raise awareness of the above issues within the beneficiary country and to offer solutions to the problems identified for consideration by them. The seminar(s) would comprise of presentations by external experts from the EU explaining the systems applicable in their jurisdictions. This would cover such topics as:

- The relationship between the police and FIU;
- The relationship between the financial investigation units, FIU, and other police units;
- The management of financial information by the police including, obtaining, handling, recording and dissemination of financial information and intelligence;
- The use of financial information in the investigative and intelligence processes;
- The criminal intelligence process and the 5X5 intelligence grading system;
- The use of risk assessments before the dissemination and exchange of intelligence including the principles of ECHR (i.e.relevance/necessity/subsidiarity etc) which is extremely pertinent when considering the intrusive nature of enquiries with the financial sector.
- The sanitising of intelligence material to disguise its origins;
- Disclosure of financial information and intelligence in court proceedings.

The participants in the seminars will be representatives from the KFM together with officers of all ranks of the MVD and specifically the unit designated to receive the STRs. Representatives of the General Prosecutor's Office and other specialist law enforcement agencies will also be appropriate to participate.

4. The Activities

4.1.1 The Opening Conference

Opening Conference	Complete
<p>Participants: <u>Beneficiary Organisation</u> - KFM offices in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Representatives of co-operating institutions</u> [Ministry of Interior, Central Bank, Ministry of Justice, General Prosecutors Office, Federal Security Service] <u>Project team</u> <u>Project Steering Group</u> <u>Consortium</u>: Belgium, UK, Italy, Slovenia, France <u>Others</u> European Commission, Council of Europe, Ukraine</p>	
<p>Specific Objective:</p> <ul style="list-style-type: none"> ▪ Official opening of the Project Implementation Period; ▪ Introduction of the Project's structure and activities; ▪ Team building; ▪ Clarification of Roles of all Project Participants; ▪ Introduction on the Mechanism for international; information exchange (module 7) ▪ Getting to know each other, in order to facilitate future co-operation; ▪ Obtaining high-level support for this Project. 	<p>Description of Activity:</p> <p>During the Opening Conference the Project Working Programme incorporating the national focus concerning legislative, institutional and practical levels of the adoption of international standards will be presented. The Opening Conference will be held to agree on the Project Work Programme including the indicators of achievement.</p> <p>The Conference aims at ensuring the commitment of beneficiaries through a high-level policy representation. Another objective of the meeting will be to clarify the roles of all the participants to ensure that everybody is aware of his tasks under the project.</p> <p>Furthermore the Conference will be the official start of the Project.</p> <p>In addition to the above, we will take the possibility to present the mechanism for international information exchange.</p>
<p>Budget Estimation:</p> <p>€ 10,000</p>	<p>Effectiveness indicators:</p> <p>The Work Programme is used during the whole duration of the Project. Where needed it will be adapted to the situation.</p> <p>All parties take their responsibility concerning their tasks in the project.</p>

	<p>Sources of verification:</p> <ul style="list-style-type: none"> - The parties involved in the Project; - The different reports that will be drafted for the European Commission; - The Final Report.
<p>Period of Implementation: March - April 2002.</p>	<p>Date and Location: Moscow 14th April 2003</p>
<p>Target Group:</p> <ul style="list-style-type: none"> ▪ National Contact Person and high level (political) representatives of the Beneficiary country ▪ Consortium ▪ Experts ▪ Project Team ▪ European Commission 	<p>Assumptions:</p> <ul style="list-style-type: none"> ▪ High level representatives of the Beneficiary country are interested in attending the meeting; ▪ All experts are found ▪ No (political) changes in the beneficiary country or Consortium Countries will influence fundamentally the execution of the Work Plan; ▪ The working relation between Project Team, Consortium and/or beneficiary country remains optimal for execution of the Work Plan; ▪ All key experts remain on the Project for the whole duration of it.
<p>Implementation Status: The first arrangements are being dealt with. The Opening Conference will be held in Moscow on 14th April.</p>	
<p>Comments: The Opening Conference will take one day. Who will chair the meeting? Who will chair and co-chair the Steering Committee? The planning of the Opening Conference is very early in time. The inception phase officially ends two months after signing the contract. Because of a very busy schedule of international fora and conferences it was not possible to plan the opening later in time.</p>	

4.1.2 Consortium Pre-Meeting

<p>Consortium Pre-Meeting</p>	
<p>Participants: Consortium members Project Team Council of Europe</p>	
<p>Specific Objective: To reach consensus on the practical arrangements that have to be taken in this project, and on the basis of which all project partners have to operate.</p>	<p>Description of Activity: All Consortium members will meet with the Project Team to discuss the draft work plan. Discussion of the rationale for the suggested Modules and allocation of roles and responsibilities</p>

<p>Reach agreement on a set of responsibilities for each of the Consortium members</p> <p>Discussion of the training activities including the time schedule and the consequences of the expected results connected to the activities.</p> <p>Team building for the Project Team and Consortium</p>	<p>for delivering the product of each. Discussion will also take place concerning the feasibility and cost of achieving the objectives set out in the draft plan and amendments made where necessary.</p>
<p>Expected Result: A clear understanding of individual roles and responsibilities. A clear framework for provision of the project activities. A clear timeframe and budget estimation for the achievement of the project activities.</p>	<p>Efficiency indicators: By agreeing a comprehensive action plan for the provision of external expert assistance to the Project the activities will be realistic, specific, achievable, measurable, and delivered within specific timescales.</p>
<p>Budget Estimation: €9,000</p>	<p>Effectiveness indicators: Minutes of the meeting Completion of the Project Work Plan</p> <p>Sources of verification: Project Work Plan</p>
<p>Period of Implementation: May - June 2003</p>	<p>Location and date: Council of Europe, Strasbourg [date to be set]</p>
<p>Target Group: Consortium members, Project Team</p>	<p>Assumptions: All Consortium Members will be able to provide assistance to cover the execution of the activities</p>
<p>Implementation Status: Preparation</p>	
<p>Comments: This activity must take place as soon as possible after the Start-Up Workshop to enable the externally supported Project activities to begin</p>	

4.1.3 Consortium Meeting

Consortium meeting	1 of 2
<p>Participants: <u>Consortium:</u> Belgium, UK, Italy, France, Slovenia, Luxembourg, external experts. <u>Project team</u> European Commission, Council of Europe</p>	
<p>Specific Objective:</p> <p>Team building and co-ordination between the Consortium members.</p> <p>Assessing part 1 of the project; Monitoring progression; Monitoring results within the beneficiary country; Discussing part 2 of the Project.</p>	<p>Description of Activity:</p> <p>During the Consortium meeting the first part of the Project will be assessed and new initiatives for the second part of the Project will be discussed. Progression in the Planning will be monitored and the Consortium will discuss the progression made in the beneficiary country.</p> <p>In case problems have occurred, the Consortium will discuss the problems and will discuss the way of handling the problems.</p> <p>During the Steering Group meeting, the results will be presented to the Commission and a work plan for part 2 of the Project will be presented. The Steering Group will have the opportunity to address specific comments and/or questions.</p>
<p>Expected Result:</p> <p>Obtaining a clear view on the results and progress made by the Project.</p>	<p>Efficiency indicators:</p> <p>All members of the Consortium and the Steering Group are gathered, which makes it possible to have short meetings. The steering group immediately has feedback from both the Project Team and the Consortium about the progress in the Project. Sources of verification: Minutes of the meeting</p>
<p>Budget Estimation:</p> <p>€ 9,000</p>	<p>Effectiveness indicators:</p> <p>By gathering the Project Team, the Consortium members and the European Commission, the transparency about the results of the Project will be optimal; Slight changes in planning and execution could be made; The European Commission is directly informed about the findings of the Consortium and the Project Team.</p> <p>Sources of verification: The report of the activity</p>
<p>Period of Implementation:</p> <p>March 2004</p>	<p>Location and date:</p> <p>Awaits</p>
<p>Target Group:</p> <p>Consortium Experts (where convenient).</p>	<p>Assumptions:</p> <p>The Project still runs All parties that are now involved, are still involved at the</p>

Project Team European Commission	end of the Project;
Implementation Status:	
Comments: The Content of the Consortium meeting is dependent of the Project itself.	

4.1.4 Consortium Meeting

Consortium meeting	2 of 2
<p>Participants: <u>Consortium:</u> Belgium, Italy, UK, Slovenia, France, Luxembourg, external experts. <u>Project Team</u> European Commission, Council of Europe</p>	
<p>Specific Objective:</p> <p>Team building and co-ordination between the Consortium members.</p> <p>Assessing part 1 of the project Monitoring progression Monitoring results within the Beneficiary Country Discussing part 2 of the Project</p>	<p>Description of Activity:</p> <p>During the Consortium meeting the first part of the Project will be assessed and new initiatives for the second part of the Project will be discussed. Progression in the Planning will be monitored and the Consortium will discuss the progression made in the CEECs.</p> <p>In case problems have occurred, the Consortium will discuss the problems and will discuss the way of handling the problems.</p> <p>During the Steering Group meeting, the results will be presented to the Commission and a work plan for part 2 of the Project will be presented. The Steering Group will have the opportunity to address specific comments and/or questions.</p>
<p>Expected Result:</p> <p>Having a clear view on what is going on within the Project</p>	<p>Efficiency indicators:</p> <p>All members of the Consortium and the Steering Group are gathered, which makes it possible to have short meetings. The steering group immediately has feedback from both the Project Team and the Consortium about the progress in the Project.</p> <p>Sources of verification: Minutes of the meeting</p>

Budget Estimation: € 9,000	Effectiveness indicators: By gathering all stakeholders, the transparency about the results of the Project will be optimal. The Beneficiary country will have the opportunity to give feedback about what they found of the activities etc. This has as a result that the European Commission is directly informed about the findings of the Beneficiary Country. Sources of verification: The report of the activity
Period of Implementation: October 2004	Location and date: Awaits
Target Group: Consortium Experts Project Team European Commission	Assumptions: The Project still runs All parties that are now involved, are still involved at the end of the Project;
Implementation Status:	
Comments: The Content of the Consortium meeting is dependent of the Project itself.	

4.1.5 Missions by the Project Team / Consortium

Missions by the Project Team / Consortium 1 of 3	
Participants: KFM offices and judicial authorities in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk] <u>Project Team</u> <u>Consortium</u>	
Facilitating experts: Mr Leonid Fituni, Project Training Advisor Mr Mark Van Thiel, External Expert	
Specific Objectives: To identify the level of training in money laundering, financial crime and analysis techniques of those organisations in the anti money-laundering chain based in the regions of the Russian Federation. To identify the providers of any such training To identify the providers of cost effective training solutions for the use of the analytical tools utilised by the KFM	Description of Activity: The experts will visit to the KFM Regional Offices, MVD training centres, and financial services sector in the Russian Federation. During the discussions, they expect to obtain a clearer view on the actual training provision and needs, and of the extent of analytical support required in the Regions. They will also identify resources for the provision of training in the analytical software already operated by the KFM

<p>Expected Result: Obtaining a clear and objective overview on the training needs and software use situation in the Regions.</p> <p>Identification of cost-effective solutions for the provision of training in those analytical tools already utilised by the KFM</p>	<p>Efficiency indicators: By combining visits in the regions, it will be possible to visit more than one Region per week. By choosing the KFM as reference the experts will be able to review all parts of the anti money laundering chain in one time. By visiting on location, a better communication is reached and the expert will be able to obtain a complete and objective impression of the situation.</p> <p>Sources of verification: The budget overview; The time planning; Regional related situation descriptions.</p>
<p>Budget Estimation:</p> <p>€ 12,000</p>	<p>Effectiveness indicators: Because the experts have done an extensive desk research on the organisation of the KFM and financial services sector, they already have a clear view on the situation in the region. During the visits, they only need to fine-tune their findings with the stakeholders in the Regions. By having an exact idea about the situation in the region, it is possible to adapt the training plan to that situation.</p> <p>Sources of verification: - Regional related situation descriptions</p>
<p>Period of Implementation: May 2003 – September 2003</p>	
<p>Target Group: All stakeholders in the Regions and the experts who are going to execute the training.</p>	<p>Assumptions: The persons involved are clear and objective about the situation in their Regions.</p>
<p>Implementation Status: No visits have been planned as yet.</p>	
<p>Comments: The Project team Leader will accompany the experts where necessary.</p>	

4.1.6 Missions by the Project Team / Consortium

Missions by the Project Team / Consortium		2 of 3
<p>Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk] Project team</p>		
<p>Facilitating experts: Mr Leonid Fituni, Project Training Advisor</p>		
<p>Specific Objective: Reviewing the results of the different activities and preparing the Training Needs Assessment [Module 8] Identifying appropriate staff in the co-operating institutions to be provided with training under Module 6</p>	<p>Description of Activity: These visits have the aim to review the situation in the Regions and monitor the results of the activities in the past months. In addition preparatory or development work on the TNA will be undertaken</p>	
<p>Expected Result: Obtaining a clear and objective overview on the progress in the Regions Identify competent individuals to become trainers in financial crime and money laundering issues Have a clear understanding of the methodology required to undertake a comprehensive TNA in the Regions</p>	<p>Efficiency indicators: By combining visits in the regions, it will be possible to visit more than one Region per week. By combining the progress monitoring with the preparation of Module 6 and the TNA, three objectives will be served.</p> <p>Sources of verification: The budget overview The time planning</p>	
<p>Budget Estimation: € 10,000</p>	<p>Effectiveness indicators: By good and personal monitoring of the beneficiaries of the past activities, it will be possible to give bilateral support where it would be necessary. With a good identification of trainers for Module 6, the quality of the course and the sustainability of it will be optimal. By determining the methodology for the TNA identification of the resources required and budget provision can be made</p> <p>Sources of verification: Progress report List of training facilities and trainers</p>	
<p>Period of Implementation: May 2003 – March 2005</p>		
<p>Target Group: All stakeholders in the Regions and the experts who are going to execute the training.</p>	<p>Assumptions:</p> <ul style="list-style-type: none"> - The persons involved are clear and objective about the progression made in the past months - All Regions have at least some kind of training facility for law enforcement and KFM personnel. 	

<p>Implementation Status: No visits have been planned as yet.</p>
<p>Comments: The Project Co-ordinator will accompany the expert where convenient.</p>

4.1.7 Missions by the Project Team / Consortium

Missions by the Project Team / Consortium		3 of 3
<p>Participants: KFM Headquarters Project Team</p>		
<p>Facilitating experts: <i>Mr Simon Goddard, Project Team Leader</i></p>		
<p>Specific Objectives: To procure the involvement by the KFM in the FIU Net project</p>	<p>Description of Activity: Discussions will be held with the organisers of the FIU Net project to examine the possibilities of the KFM joining the initiative. This will cover technical, budgetary, political and administrative considerations. The participation by the KFM in international meetings and seminars concerning FIU Net will be facilitated.</p>	
<p>Expected Result: To enable the KFM to connect to the FIU Net system and thereby improve both their analytical and international co-operation capabilities.</p>	<p>Efficiency indicators: By participating in FIU Net the KFM would be joining an innovative and high profile initiative that will enhance their analytical capabilities and their international co-operation activities. The system is already running in some countries. Sources of verification: FIU Net Project papers</p>	
<p>Budget Estimation: € 60,000</p>	<p>Effectiveness indicators: This initiative is already well advanced within both the EU and the CEECs and the results of testing of the system are already available. Sources of verification: FIU Net Project papers</p>	
<p>Period of Implementation: May 2003 to July 2004</p>		
<p>Target Group: KFM</p>	<p>Assumptions: The KFM continue to desire participation. No technical, budgetary, political or administrative obstructions arise.</p>	
<p>Implementation Status: Ongoing</p>		

Comments:

The Project Team Leader will facilitate contacts with FIU Net project team and will accompany the KFM to relevant meetings and seminars where necessary.

4.1.8 Legal and Policy Development

Legal and Policy development		Module N° 1 1/3
<p>Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director, CTIF-CFI, Belgium</i> <i>Mr Anders Cedhagen, Sweden</i></p>		
<p>Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> <u>Project Team</u></p>		
<p>Specific Objective: To improve the necessary legal, administrative and operational conditions for the further operations of the anti-money laundering systems, in full compliance with international standards.</p>	<p>Description of Activity: This activity will be executed in small workshops. This will make the assistance more intensive. Participants will receive legal assistance in order to achieve full compliance with international standards. Awareness will be raised on further upcoming legal developments.</p>	
<p>Expected Result: If needed proposals for changes in legislation are drafted and where possible implemented in the national legislation.</p>	<p>Efficiency indicators: By working in small groups, it will not be necessary for experts to travel throughout the Russian federation. This method will save time and money. Next to that, working in groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert. Sources of verification: Amount of missions done by the legal experts of the Consortium The report of this activity.</p>	
<p>Budget Estimation: € 5,000</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshops will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved and participants are addressed directly. Sources of verification: The activity report; The national legislation of the participating country (drafted proposals for amendments). The implementation of amended legislation</p>	

Period of Implementation: Awaits	Planned dates and places for the workshops: Moscow - Awaits
Target Group: Legal Advisors from the Ministries of Justice and Finance with ability to make legislative texts (Act amendments).	Assumptions: The right legal advisors attend the workshop sessions Interpreters from Russian to English are provided or participants understand English.
Implementation Status: In the Inception Phase, the recent developments in legislation will be studied. In this way the legal experts of the Consortium know what input will be needed. <u>Actions to be taken during the inception phase and thereafter:</u> Gathering of anti-money laundering legislation Gathering of general information on the general anti-money laundering situation Making a need analysis concerning legislative support (with the input of the beneficiary country: what do they want).	
Comments: It is felt that instead of making groups on the basis of level of development, the workshops would be executed at a regional level. This will result in 3 workshops being undertaken- East, Central and Western Russia.	

4.1.9 Legal and Policy Development

Module N° 1 2 / 3	
Legal and Policy development	
Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director, CTIF-CFI, Belgium</i> <i>Mr Anders Cedhagen, Sweden</i>	
Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> <u>Project Team</u>	
Specific Objective: To improve the necessary legal, administrative and operational conditions for the further operations of the anti-money laundering systems, in full compliance with international standards.	Description of Activity: This activity will be executed in small workshops. This will make the assistance more intensive. Participants will receive legal assistance in order to achieve full compliance with international standards. Awareness will be raised on further upcoming legal developments.
Expected Result: If needed proposals for changes in legislation are drafted and where possible implemented in the national legislation.	Efficiency indicators: By working in small groups, it will not be necessary for experts to travel throughout the Russian federation. This method will

	<p>save time and money. Next to that, working in groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert.</p> <p>Sources of verification: Amount of missions done by the legal experts of the Consortium The report of this activity.</p>
<p>Budget Estimation:</p> <p>€ 5,000</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshops will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved and participants are addressed directly.</p> <p>Sources of verification: The activity report; The national legislation of the participating countries (drafted proposals for amendments). The implementation of amended legislation</p>
<p>Period of Implementation: Awaits</p>	<p>Planned dates and places for the workshops: Moscow - Awaits</p>
<p>Target Group: Legal Advisors from the Ministries of Justice and Finance with ability to make legislative texts (Act amendments).</p>	<p>Assumptions: The right legal advisors attend the workshop sessions Interpreters from Russian to English are provided or participants understand English.</p>
<p>Implementation Status: In the Inception Phase, the recent developments in legislation will be studied. In this way the legal experts of the Consortium know what input will be needed.</p> <p><u>Actions to be taken during the inception phase and thereafter:</u> Gathering of anti-money laundering legislation Gathering of general information on the general anti-money laundering situation Making a need analysis concerning legislative support (with the input of the beneficiary country: what do they want).</p>	
<p>Comments: It is felt that instead of making groups on the basis of level of development, the workshops would be executed at a regional level. This will result in 3 workshops being undertaken- East, Central and Western Russia.</p>	

4.1.10 Legal and Policy Development

<p>Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director, CTIF-CFI, Belgium</i> <i>Mr Anders Cedhagen, Sweden</i></p>	
<p>Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Project Team</u> <u>Consortium</u></p>	
<p>Specific Objective: To improve the necessary legal, administrative and operational conditions for the further operations of the anti-money laundering systems, in full compliance with international standards.</p>	<p>Description of Activity: This activity will be executed in small workshops. This will make the assistance more intensive. Participants will receive legal assistance in order to achieve full compliance with international standards. Awareness will be raised on further upcoming legal developments.</p>
<p>Expected Result: If needed proposals for changes in legislation are drafted and where possible implemented in the national legislation.</p>	<p>Efficiency indicators: By working in small groups, it will not be necessary for experts to travel throughout the Russian federation. This method will save time and money. Next to that, working in groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert. Sources of verification: Amount of missions done by the legal experts of the Consortium The report of this activity.</p>
<p>Budget Estimation: € 5,000</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshops will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved and participants are addressed directly. Sources of verification: The activity report; The national legislation of the participating countries (drafted proposals for amendments). The implementation of amended legislation</p>
<p>Period of Implementation: Awaits</p>	<p>Planned dates and places for the workshops: Moscow - Awaits</p>
<p>Target Group: Legal Advisors from the Ministries of Justice and Finance with ability to make legislative texts (Act amendments).</p>	<p>Assumptions: The right legal advisors attend the workshop sessions Interpreters from Russian to English are provided or participants understand English.</p>

Implementation Status:

In the Inception Phase, the recent developments in legislation will be studied. In this way the legal experts of the Consortium know what input will be needed.

Actions to be taken during the inception phase and thereafter:

Gathering of anti-money laundering legislation

Gathering of general information on the general anti-money laundering situation

Making a need analysis concerning legislative support (with the input of the beneficiary country: what do they want).

Comments:

It is felt that instead of making groups on the basis of level of development, the workshops would be executed at a regional level. This will result in 3 workshops being undertaken- East, Central and Western Russia.

4.1.11 Developing Procedures for Monitoring Compliance and Feedback

Developing procedures for monitoring compliance and giving and obtaining feedback	Module N°2
Facilitating Experts: <i>Mr Klaudijo Stroligo, Slovenia</i> <i>Mr Francesco De Pasquale, Italy</i> <i>[both provisional]</i>	
Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Project Team</u> Consortium	
Specific Objective: Improving the structural and operational capacities of all the established institutions combating money laundering (i.e. policy makers, reporting institutions supervisory authorities, FIU, law enforcement services, judiciary and confiscation authorities); Effective co-operation should be based on an improved flow of relevant information between the financial institutions, FIU, policy department of Ministries, public prosecution and police.	Description of Activity: This activity will be held in the form of a Seminar with three breakout sessions. The grouping of the sessions will be based on level of development. Before the activity, the participants will be asked to describe accurately the situation of the FIU regarding the following subjects: existing procedures on monitoring compliance, existing procedures on financial analyses, existing procedures on supplying information to law enforcement authorities, existing procedures on providing feedback to partners in the ML chain. For this activity, experts from the financial sector will be invited to give their input in the Seminar and the break out sessions. Each of them will speak about one or more of the above-mentioned topics. An FIU (strategic) analyst will give a presentation about techniques of monitoring compliance. Next to that the Feedback aspect will be handled.

	<p>Feedback from the FIU to the reporting institutions and on the other hand feedback to law enforcement and vice versa.</p> <p>The activity will take three days. Each day will be split in a morning and an afternoon session. In the morning there will be a plenary sessions, in which general presentations will be held. In the afternoon, the participants will have the possibility to discuss the topics that have been discussed in the morning. Each day will be dedicated to a part of the above-mentioned topics.</p>
<p>Expected Result: The FIU has developed formal working relationships with most reporting institutions and professionals as well as the supervisory authorities in the form of meetings.</p> <p>There are regular meetings of Law enforcement with the public prosecutor(s), which are trained on financial aspects of criminal cases.</p> <p>The practical output of the course should enable FIU: To structure better their activities; Create standardised procedures on monitoring compliance; Create standardised procedures on monitoring financial analyses; Create standardised procedures on (two way) feed back; Supplying the right, timely and useful information to Law enforcement.</p>	<p>Efficiency indicators: All FIU and financial sector representatives gather in one place, but there will be possibility to give them tailor made assistance during the workshop sessions. During the plenary session, participants will be invited to exchange experience among each other.</p> <p>By gathering all participants, it is possible for the Project to invite experts from the financial sector.</p> <p>Sources of verification: - Budget estimation; - Report of this activity.</p>

<p>Budget Estimation:</p> <p>€ 15,000</p>	<p>Effectiveness indicators:</p> <p>By asking beforehand a report on the actual situation concerning the content of this activity, it is easier to adapt the presentations to the needs of the participants. By having the participants draft a paper, they will be prepared properly for the activity and the Project Team will have a reference for the final result of the activity.</p> <p>By gathering all appropriate representatives, it will be more likely that there is exchange of experience. By conducting afternoon breakout sessions, each participant will receive tailor-made support on specific problems that might occur in their organisation.</p> <p>Sources of verification:</p> <p>Situation descriptions; Certification reports (to be drafted afterwards); Report of the activity.</p>
<p>Period of Implementation:</p> <p>Awaits</p>	<p>Planned location and date:</p> <p>Awaits</p>
<p>Target Group:</p> <p>Appropriate KFM staff, compliance officers and members of supervisory authorities.</p>	<p>Assumptions:</p> <p>All participants fully participate in the activity; The experts from the financial sector are willing to co-operate</p>
<p>Implementation Status:</p> <p>Facilitating experts are being sought before looking for the experts from the financial sector.</p>	
<p>Comments:</p> <p>.</p>	

4.1.12 Bankers Course

Bankers Course	Module N°3
<p>Facilitating Experts: <i>Mr Jean-Luc Kamphaus - Luxembourg</i></p>	
<p>Participants: <u>Central Bank and Financial Services Sector</u> representatives from the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> <u>Project Team</u> <u>External Experts from the Financial Services Sector</u></p>	
<p>Specific Objective: Improving the structural and operational capacities of all the established institutions combating money laundering (i.e. policy makers, reporting institutions supervisory authorities, FIU, law enforcement services, judiciary and confiscation authorities)</p>	<p>Description of Activity: There is a course that has been developed by the Financial Technology Transfer Agency of Luxembourg. The main idea of this course is that the private sector in Luxembourg helps the private sector in the Russian Federation. The Course exists for several years now. Also during the last two Phare money-laundering projects, the Ministry of Finance in Luxembourg offered this course. Usually the Course is meant only for compliance officers from financial institutions. It is also thought that representatives from supervisory authorities could benefit from the course so it was decided that this group would also be offered the opportunity to participate. In this course attention is given to the way compliance officers can identify money laundering schemes.</p>
<p>Expected Result: Reporting institutions are aware of the importance of good compliance and complete disclosures. Supervisory authorities know how to monitor compliance of the credit and financial institutions (where they are competent to do so). They have developed regular information and expertise</p>	<p>Efficiency indicators: This is an existing course. There will be no need for extensive preparation and development. The Ministry of finance of Luxembourg may finance this course Sources of verification: Budget estimation</p>

exchange between FIU and the reporting institutions	
Budget Estimation: € 25,000	Effectiveness indicators: The course is given by the financial sector, which makes it more attractive to the participants. They will receive support at their own level, by experts who they trust. By introducing representatives of the supervisory authorities, the course could make a different move. There could be discussion between supervisors and compliance officers. Sources of verification: Report of this activity, containing also evaluation report by the participants
Period of Implementation: Awaits	Planned date for the Course: Awaits
Target Group: Compliance Officers and Supervisors.	Assumptions: The beneficiary country sends participants (this will be controlled) The Supervisors will give their specific input to the course. All participants speak English or simultaneous interpretation is provided The Finance Ministry of Luxembourg can be persuaded to participate in the Project as a Consortium Member and facilitate the supply of the course
Implementation Status: This course has already been developed. Identification of participants has not been established.	
Comments:	

4.1.13 Training for Analysts

Training for Analysts	Module N°4
Facilitating expert: <i>Mr. Andrew Blezzard, Deputy Head of the Economic Crime Unit (FIU in the UK)</i>	
Participants: <u>KFM offices and judicial authorities</u> in the 7 federal districts (Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> <u>Project Team</u>	
Specific Objective: To provide a financial analysis training product for the beneficiary country that can be adopted by them for continuous local implementation	Description of Activity: This module shall help the target group to improve their knowledge regarding technical aspects of the financial analysis, money laundering schemes and new type of crimes and crime groups. The training will make use of the computer-based training-tool, which would make it possible for the participants to spread their knowledge at a national level.
Expected Result: A group of analysts / investigators is trained in a way that has proved to be of good quality. As a result, this group has an increased technical knowledge of financial analysis and/or investigation. The participants of this training know how to use the computer based training tool, and will be able to help colleagues in their own organisations to use the tool.	Efficiency indicators: The training already exists and is proven to be effective in the UK; By using the computer-based training tool, the course could be one day shorter than usually. The training material (i.e. computer-based training tool) is translated into Russian and can therefore be spread in the beneficiary country for national use. Sources of verification: The budget estimation The report of the activity
Budget Estimation: € 25,000	Effectiveness indicators: The training will supply analysts and investigators direct, technical information on financial analysis. The students can make use of the computer-based training tool, which makes it possible for them to work in their own time at their own level and, because the tool will be translated, they could work in their own language, which makes it more pleasant and stimulating for them. Sources of verification: Activity reports; The level of knowledge of the trained analysts/investigators The distribution level of the computer-based training tool within the beneficiary country.
Period of Implementation: Awaits	Planned date: Awaits
Target Group: FIU Analysts	Assumptions: The Computer-based training tool is ready to use;

Law Enforcement financial investigators	The participants speak and understand English or simultaneous interpretation is provided; The participants have already a certain knowledge of financial analysis and / or investigation The training facility makes it possible to use the computer-based training.
Implementation Status: The training is developed by the NCIS in the United Kingdom. The content of the training will differ a little bit, because also in this training the Computer-based training tool will be used. The content of the computer-based training is adapted to the content of the financial analysis course.	
Comments: Focus lies on the KFM analysts.	

4.1.14 Awareness raising workshop for prosecutors and judges

Awareness raising workshop for public prosecutors and Judges Module N°5 /1	
Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director of CTIF-CFI (FIU of Belgium)</i> <i>Mr Anders Cedhagen, Sweden</i> <i>Mr Klaudijo Stroligo, Slovenia</i>	
Participants: <u>Prosecutors and Judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> <u>Project Team</u>	
Specific Objective: To improve effective co-operation between all institutions of the money laundering chain in the beneficiary country. The strengthening of the judicial follow up to cases initiated by the KFM	Description of Activity: Because it is expected that the level of experience with money laundering is the judiciary part of the anti-money laundering chain is not very high, the workshops will have as main objective to raise awareness with public prosecutors and judges on the money-laundering problem. The participants will discuss in small groups about what money laundering is, and what the role of the judiciary is in a proper follow-up in (money laundering) criminal case.

<p>Expected Result: Public prosecutors and Judges in the beneficiary country will be aware that a proper follow-up to the investigation results of the KFM and law enforcement investigations is indispensable for the fight against money laundering</p> <p>The public prosecutor(s) and the KFM have developed regular working and communication links. Where appropriate and necessary, they have working relations with the disclosing institutions.</p> <p>Judges have developed an understanding of the specific problems related to money laundering cases</p>	<p>Efficiency indicators By working in small groups, it will not be necessary for experts to travel throughout the whole of Russia. This method will save time and money. Next to that, working in small groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert.</p> <p>Sources of verification: Amount of missions done by the legal experts of the Consortium; The report of this activity. The follow-up of this activity</p>
<p>Budget Estimation:</p> <p>€ 7,000</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshop will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved; Participants are addressed directly.</p> <p>Sources of verification: The activity report; The follow-up in criminal cases (long-term and not one will not be able to prove that only this workshop has established a higher level in functioning of the judiciary).</p>
<p>Period of Implementation: Awaits</p>	<p>Planned date: Moscow - Awaits</p>
<p>Target Group: Where possible Public Prosecutors and Judges with a certain basic knowledge about the money laundering issue.</p>	<p>Assumptions: We will try to find public prosecutors and judges with a certain basic knowledge in the field of money laundering. Identify participants that understand and speak English or arrange simultaneous interpretation.</p>
<p>Implementation Status: During the inception phase a general study is done on the overall anti-money laundering situation in the beneficiary country. In the course of the Project, we will need to specifically look at the judiciary.</p>	
<p>Comments: In the Egmont Group, an inventory has been made of Public Prosecutors who are working regularly with money laundering cases. This inventory can be examined to ascertain whether it can be used as a point of departure for the identification of the participants.</p>	

4.1.15 Awareness raising workshop for prosecutors and judges

<p>Awareness raising workshop for public prosecutors and Judges Module N°5 /2</p>	
<p>Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director of CTIF-CFI (FIU of Belgium)</i> <i>Mr Anders Cedhagen, Sweden</i> <i>Mr Klaudijo Stroligo, Slovenia</i></p>	
<p>Participants: <u>Prosecutors and Judicial authorities</u> in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> Project Team</p>	
<p>Specific Objective: To improve effective co-operation between all institutions of the money laundering chain in the beneficiary country. The strengthening of the judicial follow up to cases initiated by the KFM</p>	<p>Description of Activity: Because it is expected that the level of experience with money laundering is the judiciary part of the anti-money laundering chain is not very high, the workshops will have as main objective to raise awareness with public prosecutors and judges on the money- laundering problem. The participants will discuss in small groups about what money laundering is, and what the role of the judiciary is in a proper follow-up in (money laundering) criminal case.</p>
<p>Expected Result: Public prosecutors and Judges in the beneficiary country will be aware that a proper follow-up to the investigation results of the KFM and law enforcement investigations is indispensable for the fight against money laundering</p> <p>The public prosecutor(s) and the KFM have developed regular working and communication links. Where appropriate and necessary, they have working relations with the disclosing institutions.</p> <p>Judges have developed an understanding of the specific problems related to money laundering cases</p>	<p>Efficiency indicators By working in small groups, it will not be necessary for experts to travel throughout the whole of Russia. This method will save time and money. Next to that, working in small groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert.</p> <p>Sources of verification: Amount of missions done by the legal experts of the Consortium; The report of this activity. The follow-up of this activity</p>
<p>Budget Estimation: € 8,500</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshop will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved; Participants are addressed directly.</p>

	Sources of verification: The activity report; The follow-up in criminal cases (long-term and not one will not be able to prove that only this workshop has established a higher level in functioning of the judiciary).
Period of Implementation: Awaits	Planned date: Ekaterinburg - Awaits
Target Group: Where possible Public Prosecutors and Judges with a certain basic knowledge about the money laundering issue.	Assumptions: We will try to find public prosecutors and judges with a certain basic knowledge in the field of money laundering. Identify participants that understand and speak English or arrange simultaneous interpretation.
Implementation Status: During the inception phase a general study is done on the overall anti-money laundering situation in the beneficiary country. In the course of the Project, we will need to specifically look at the judiciary.	
Comments: In the Egmont Group, an inventory has been made of Public Prosecutors who are working regularly with money laundering cases. This inventory can be examined to ascertain whether it can be used as a point of departure for the identification of the participants.	

4.1.16 Awareness raising workshop for prosecutors and judges

Awareness raising workshop for public prosecutors and Judges Module N°5 /3	
Facilitating experts: <i>Mr. Boudewijn Verhelst, Deputy Director of CTIF-CFI (FIU of Belgium)</i> <i>Mr Anders Cedhagen, Sweden</i> <i>Mr Klaudijo Stroligo, Slovenia</i>	
Participants: Prosecutors and Judicial authorities in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Consortium</u> Project Team	
Specific Objective: To improve effective co-operation between all institutions of the money laundering chain in the beneficiary country. The strengthening of the judicial follow up to cases initiated by the KFM	Description of Activity: Because it is expected that the level of experience with money laundering is the judiciary part of the anti-money laundering chain is not very high, the workshops will have as main objective to raise awareness with

	public prosecutors and judges on the money-laundering problem. The participants will discuss in small groups about what money laundering is, and what the role of the judiciary is in a proper follow-up in (money laundering) criminal case.
<p>Expected Result: Public prosecutors and Judges in the beneficiary country will be aware that a proper follow-up to the investigation results of the KFM and law enforcement investigations is indispensable for the fight against money laundering</p> <p>The public prosecutor(s) and the KFM have developed regular working and communication links. Where appropriate and necessary, they have working relations with the disclosing institutions.</p> <p>Judges have developed an understanding of the specific problems related to money laundering cases</p>	<p>Efficiency indicators By working in small groups, it will not be necessary for experts to travel throughout the whole of Russia. This method will save time and money. Next to that, working in small groups will give the participants more feedback on their opinions and changes will be reached by means of discussion rather than by instruction of a legal expert.</p> <p>Sources of verification: Amount of missions done by the legal experts of the Consortium; The report of this activity. The follow-up of this activity</p>
<p>Budget Estimation:</p> <p>€ 8,500</p>	<p>Effectiveness indicators: By gathering small groups, it must be possible to give tailor made support. The workshop will be a facilitated process rather than a one-way lesson in drafting legislation. The participants are personally involved; Participants are addressed directly.</p> <p>Sources of verification: The activity report; The follow-up in criminal cases (long-term and not one will not be able to prove that only this workshop has established a higher level in functioning of the judiciary).</p>
<p>Period of Implementation: Awaits</p>	<p>Planned date: Novosibirsk - Awaits</p>
<p>Target Group: Where possible Public Prosecutors and Judges with a certain basic knowledge about the money laundering issue.</p>	<p>Assumptions: We will try to find public prosecutors and judges with a certain basic knowledge in the field of money laundering. Identify participants that understand and speak English or arrange simultaneous interpretation.</p>

Implementation Status:

During the inception phase a general study is done on the overall anti-money laundering situation in the beneficiary country. In the course of the Project, we will need to specifically look at the judiciary.

Comments:

In the Egmont Group, an inventory has been made of Public Prosecutors who are working regularly with money laundering cases. This inventory can be examined to ascertain whether it can be used as a point of departure for the identification of the participants.

4.1.17 Train the Trainers

Train the Trainers	Module N°6
Facilitating expert: <i>Mr Andrew Blezzard, Deputy Head, Economic Crime Unit, UK</i>	
Participants: KFM offices in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk] Ministry of Interior Economic Crime Dept. Ministry of Interior Training Academy Consortium Project Team	
Specific Objectives: To improve effective co-operation between all institutions of the anti money laundering chain in the beneficiary country. To train a selective number of individuals representing the organisations in the anti money laundering chain to create and develop a training package in accordance with the particular operational needs. To provide a sustainable training product specifically designed for the particular circumstances prevalent in the beneficiary country.	Description of Activity: A small group [Max 16] of beneficiary country representatives will be instructed to give training at a national level. These representatives will be drawn from all the participating organisations and institutions and will receive all necessary training materials. They will be trained in how to create and develop a basic financial investigation course covering: sources of information, case management, handling of financial information / intelligence, confidential enquiries, legislation and money laundering. The practical output will be that once this group are trained, others working in the field of combating money laundering in the beneficiary country will be instructed in their own language. This means that also after this Project is finished, new employees in the different organisations in the anti-money laundering chain can be trained.
Expected Result:	Efficiency indicators:

<p>The students develop a training course particular to the need of their organisation. That training will be delivered in their own environment or utilising the facilities of an established training centre.</p> <p>Up to 16 trained students are working on national anti money laundering training, using the experience gained from this activity.</p>	<p>The course itself is already developed and proven effective in the UK and in training provided to the CEECs A maximum of 16 participants will be trained which is the optimum number for this style of training They will then be able to promulgate their knowledge by the supply of national training to various representatives of organisations that are active in the field of money laundering; Because of a low amount of participants, the students will receive a lot of personal attention. The training is skills based and student centred By using the computer-based training tool, the participants will have the chance to learn using up to date technologies and techniques. The students will receive copies of the course work in the Russian language</p> <p>Sources of verification: The Budget estimation; Low amount of participants</p>
<p>Budget Estimation:</p> <p>€ 30,000</p>	<p>Effectiveness indicators: By incorporating the elements of the UK's existing training programme, the project is given a particularly powerful, cost effective and sustainable methodology to achieve the improvement of effective co-operation along the whole chain of national anti-money laundering services. By providing the course and lesson plans, which will be translated into the language of the beneficiary country, the students already have a powerful tool for the implementation of training in their own country. Comprehensive evaluation programme based on the Kirkpatrick Model</p> <p>Sources of verification: Amount of training courses implemented in the beneficiary country; The translation of the course work material and any computer-based training tool into the language of the beneficiary country; The report of this training Evaluation Process</p>
<p>Period of Implementation: Awaits</p>	<p>Planned date: Moscow - Awaits</p>

<p>Target Group: 16 students drawn from the organisations within the ant money laundering chain of Russian Federation, who have basic knowledge about money laundering and financial crime issues and ideally already have some training skills or the potential to develop such skills.</p>	<p>Assumptions: The participants have existing training skills or are able to develop them to a reasonable standard The participants have basic knowledge about money laundering The Computer-based training tool is ready to use; The Russian Federation insists on the use of national training facilities to implement the template course The training facilities are also accessible for non-law enforcement personnel A suitable venue is found for provision of the training</p>
<p>Implementation Status: The course itself is ready. The exact content has to be filled in. The computer-based training tool has to be developed.</p>	
<p>Comments: It is important that co-operation and co-ordination between the organisations is insisted upon. This means that, even though the training maybe given in a police school, those organisations such as the KFM who do not as yet have a dedicated training facility have access to it.</p> <p>By introducing the computer-based training tool into this training, the added value of the training will increase considerably. The computer-based training for use within this activity has not been developed as yet.</p>	

4.1.18 International co-operation and the exchange of financial information / intelligence

<p>International co-operation and exchange of financial information/intelligence</p>	<p align="center">Module No 7</p>
<p>Facilitating expert: <i>Mr Klaudijo Stroligo, Slovenia</i> <i>Ms Isabelle Schoonwater, France</i> <i>Mr Francesco De Pasquale, Italy</i></p> <p>Participants: <u>KFM Moscow</u> <u>Heads of FIUs from the CEECs</u> <u>All Consortium Members</u> <u>Project Team</u></p>	
<p>Specific Objective: To determine whether the existing way's of</p>	<p>Description of Activity:</p>

<p>communication on the AML topic are still relevant in today's situation, taking into account general crime trends and the different FIU developments; To determine whether the present way's of international communication require stricter safeguards on the mechanism of exchange of AML information; To discuss whether multi jurisdictional way's of co-operation and involving other agencies to create multi agency co-operation between countries;</p>	<p>A one-day seminar that would provide a forum for an open and frank discussion on practical issues concerning the exchange of information between the KFM and the FIUs of the CEECs and EU. It will also address the development of electronic transfer of information and intelligence internationally and the use of Memoranda of Understanding. The seminar will also afford an opportunity for the participants to break out into workshops to discuss practical issues surrounding co-operation between FIUs.</p>
<p>Expected Result: The KFM will be aware of the possibilities, practicalities and limitations, of the exchange of information and intelligence with other European FIUs.</p>	<p>Efficiency indicators: 1 seminar for one day is sufficient to meet the needs of the activity By scheduling the seminar to correspond with the Consortium members presence in Moscow for other project activity costs are reduced. Sources of verification: Minutes of meeting Budget calculations</p>
<p>Budget Estimation: € 15,000</p>	<p>Effectiveness indicators: Improvement in the flow of information between FIUs Timescale for response to requests reduces Greater understanding of constraints on exchange Sources of verification: Implementation or development of existing of Memoranda of Understanding</p>
<p>Period of Implementation: Awaits</p>	<p>Location and date: Moscow</p>
<p>Target Group: Senior KFM staff [Heads of Department] and those involved in international co-operation issues</p>	<p>Assumptions: All participants are available and the right level of representation is provided All parties are prepared to be honest and open about the possibilities within their own jurisdiction</p>
<p>Implementation Status: A relatively easy seminar to organise and facilitate. Can be undertaken at any time suitable over the life of the project.</p>	
<p>Comments:</p>	

4.1.19 Feasibility study and proposal for follow-up project

Feasibility Study and proposal for follow-up project	Module No 8
<p>Participants: A 10-20% sample of representatives at all levels of all organisations and institutions in the anti money laundering chain throughout the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk].</p> <p>Undertaken by: <i>Leonid Fituni – Project Training Advisor</i> <i>External Experts</i></p>	
<p>Specific Objective: To assess the capabilities of the KFM and MVD in terms of skills and abilities, knowledge and understanding, in combating financial crime and money laundering so as to make proposals for any future Project activity.</p>	<p>Description of Activity: To undertake a Training Need Analysis [TNA] within the KFM and MVD utilising a scientific approach. This will include an extensive consultation process with all stakeholders with random sampling of those in the anti money-laundering chain of between 10-20%. This will be conducted by a combination of methods including questionnaires and interviews. This process will clearly identify the difference between the existing level of training of the individuals and the needs of the organisations. This process will begin during the life of this project to utilise the contacts made by the project team during the various activities.</p>
<p>Expected Result: Clear indication of the further training need of the key organisations involved in the fight against money laundering in the Russian Federation. Decision makers and stakeholders will be able to determine whether a follow-up project is either feasible or justified Outline proposal for follow-up project</p>	<p>Efficiency indicators: The expert undertaking this process will be able to undertake the consultation process in the regions at the same time as conducting other designated activities thereby saving costs and resources.</p> <p>Sources of verification: The TNA report, completed questionnaires and records of sample interviews.</p>
<p>Budget Estimation: € 25,000</p>	<p>Effectiveness indicators: The results of this TNA will easily be incorporated into the training programmes initiated under this Project Trainers will have already been trained under this project who will make use of the results of this TNA The project team will have another means with which to assess the effectiveness of the various activities.</p> <p>Sources of verification: TNA Report</p>

	Adoption of recommendations by KFM and MVD senior management
Period of Implementation: April 2003 to July 2005	Location and date: All regions on divers dates
Target Group: KFM and MVD staff at the operational and 1 st line supervisory level	Assumptions: KFM and MVD senior managers provide access to their staff KFM and MVD staff support the initiative and co-operate with the research
Implementation Status: Research is required from those that have undertaken this process already in order to create the most appropriate questionnaires and interview briefing notes.	
Comments: A vital element in the development of the KFM and the MVD in particular as it should influence their training policy for some years	

4.1.20 Improving Inter-Agency Co-operation

Improving Inter-Agency Co-operation Module 9	
Facilitating Expert: <i>Mr Francesco De Pasquale, Italy</i> <i>Ms Isabelle Schoonwater, France [both provisional]</i>	
Participants: <u>Beneficiary Organisation</u> - KFM offices in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Representatives of co-operating institutions</u> [Ministry of Interior, Ministry of Justice, General Prosecutors Office, Federal Security Service] <u>Project team</u>	
Specific Objective: To improve inter-agency co-operation throughout the anti money laundering chain	Description of Activity: One-day seminar within which demonstrations by external experts will show the benefits of inter-agency co-operation
Budget Estimation: € 15,000	Effectiveness indicators: Greater use being made of the intelligence contained within a transaction report leading to more arrests for financial crime and money laundering offences Sources of verification: Speed at which transaction reports are disseminated by the KFM Quality of disseminated reports Numbers of cases being referred for investigation Numbers of cases containing intelligence of value to police

Period of Implementation: Awaits	Date and Location: Moscow
Target Group: KFM MVD Prosecutors Office Other competent law enforcement agencies	Assumptions: Project still ongoing All parties still participating
Implementation Status:	
Comments:	

4.1.21 Annual Typologies Meeting

Annual Typologies Meeting	
<p>Facilitating Expert: <i>Project Team</i></p> <p>Participants: <u>Beneficiary Organisation</u> - KFM offices in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk]. <u>Representatives of co-operating institutions</u> [Ministry of Interior, Central Bank, Ministry of Justice, General Prosecutors Office, Federal Security Service] <u>Project team</u> <u>Consortium</u>: Belgium, UK, Italy, Slovenia, France, Luxembourg, external experts. <u>Council of Europe</u>: PC-ReV</p>	
<p>Specific Objective: Highlight awareness of new money laundering typologies</p>	<p>Description of Activity: Conducted in the form of a seminar</p>
<p>Budget Estimation: € 15,000</p>	<p>Effectiveness indicators: Recognition of money laundering typologies</p> <p>Sources of verification: Report of the meeting</p>
<p>Period of Implementation:</p>	<p>Date and Location: Moscow 2004</p>
<p>Target Group: Representatives of all institutions within the anti money laundering chain in the beneficiary country</p>	<p>Assumptions: Project still ongoing All parties still participating</p>
<p>Implementation Status:</p>	
<p>Comments: Russia has volunteered to host the 2004 FATF Typologies exercise in Moscow and if that goes ahead the number of participants will be greatly increased by the involvement of FATF country representatives.</p>	

4.1.22 Closing Conference

Closing Conference

Participants:

KFM offices and judicial authorities in the 7 federal districts [Moscow, Saint Petersburg, Rostov, Nizhni Novgorod, Novosibirsk, Ekaterinburg and Khabarovsk].

Financial Services Sector Representatives

Consortium

European Commission

Council of Europe

Representatives of any other agency that have contributed to the delivery of the Project

Specific Objective:

Official closing of the Project
Expression of gratitude for the co-operation in this Project

Description of Activity:

During this meeting, the Project will officially be closed. The results will be discussed in general terms, as the final report will not yet be completed.

Expected Result:

A clear discussion about the results of the Project;
A report of this activity;
Input for the final report;

Efficiency indicators:

All active partners of the Project are gathered, which makes it possible to have an optimal discussion about the results of the Project.

Sources of verification:

Minutes of the meeting;
Final report

Budget Estimation:

€ 25,000

Effectiveness indicators:

By gathering all stakeholders, the transparency about the results of the Project will be optimal.
The Beneficiary country will have the opportunity to give feedback about what they found of the activities etc.
As a result that the European Commission is directly informed about the findings of the Beneficiary Country.

Sources of verification:

The report of the activity
The final report

Period of Implementation:

Location and date:

Moscow April 2005

Target Group:

KFM and other beneficiary organisations
Consortium
Experts
Project Team
European Commission

Assumptions:

The Project still runs
All parties that are now involved, are still involved at the end of the Project;

Implementation Status:

4.1.23 Targeted Study Visits / Internships

The targeted study visits have not been described in a table, because it is anticipated that these visits all have different contents. Furthermore it is not sure which target group will get a visit. Only if it is considered necessary to support other activities delivered to an individual under the auspices of this project, and where clear objectives and anticipated achievements are stated at the outset, will study visits / internships be arranged. Evaluation of the effectiveness of study visits is difficult to achieve unless follow-up systems are in place to measure the impact of the knowledge gained upon the individual upon the activity in their workplace. Still more elusive is the ability to quantify whether value for money has been achieved.

The notion of study visits if managed correctly makes it possible for an individual or group to gain an overview of a specific situation in a guest country. However, the success of such an initiative depends wholly on the willingness of the host country/organisation to prepare a comprehensive programme of activities and to provide complete access to those areas of interest. If these conditions are met visitors can meet their colleagues of the other country in their own environment and such initiatives should be supported. However, as the host organisations will invariably be Financial Intelligence Units such conditions are unlikely to be met for both resource and security reasons, even for the staff of other FIUs.

4.2 The development of a computer based-training-tool - background and functionality

4.2.1 Introduction - the form of the computer-based training

Instead of using a study book, from which a person could learn by reading, the computer-based training aims to deliver dynamic and effective training online. This would be via the web and/or CD-Rom and would provide engaging and attractive ways to enable people to have the basic knowledge of money laundering and the fight against it. Part of the training could be developed in the form of an interactive "game" that would give the right messages and fulfil the training objectives. The ability to assess peoples understanding and validate the effectiveness of the training would be built into the programme. The initial instructional design on the content would define different levels of participation and questioning to reflect the variety of user requirements.

4.2.2 Efficiency

By using the computer-based training programme, individual courses would be more accessible to everyone, whilst reducing classroom time, travel and costs. Other advantages include consistency of training received by everyone on both general and technical aspects. The initial investment of time and resource could be maximised by more easily updating and maintaining the programme, which would mean a reduction of printing and distribution costs. This would result in a self-managed asset, which could be used by all the interested parties as many times as needed to as many people.

4.2.3 Effectiveness

The online training would also give the advantages of scalability and flexibility to meet different local requirements. By learning via computer-based training, the participants

can progress their knowledge at a national level, in their own language. The programme can be multiplied as much as the beneficiary country wants. As many FIUs have the legal obligation to give information to the reporting institutions, they can use the computer-based training for this purpose, just by distributing the CD-ROM or having a web link. Herewith an important contribution is given to the sustainability of the Project.

4.2.4 Computer-based training and 'Train the Trainers'

The main objective of this course is to instruct trainers from the beneficiary country to give national training about money laundering and the fight against it. The computer-based training programme would support the trainers and would provide material for them to use locally. The programme could serve as a permanent training package for specific anti-money laundering training. During the Train the Trainers Module, the programme will serve as material supporting the different topics that are being discussed.

4.2.5 Efficiency

The trainers will receive a complete resource for the development of their own national training. Also if the training skills of some trainers are not excellent, a high level of excellent training would be presented by means of the CD-ROM, which ensures everyone is working to the same standard. Also for the Train the Trainers Course the course could be shorter than usual and that the participants can work individually in their own language, in their own time.

4.2.6 Effectiveness

By using the computer-based training, the trainers have an important part of their training material in their national language. It is a productive and pleasant way to learn about a topic, which will stimulate the students in the Beneficiary Country.

4.2.7 Computer based training and the Analyst Training

The main objective of the training for analyst's module is to give technical training to financial analysts of the KFM and law enforcement. The computer-based training can be used for the theoretical part of the training. The input in the computer based training can be developed in such a way that it perfectly fits into the programme as it is and will be translated into the languages of the Beneficiary country. This has as an effect that the students can work in their own speed, in their own language, which would make it possible to shorten the course with at least one day.

4.2.8 Efficiency

By using the computer based training, the programme can be shorter that would be usual using conventional techniques, the students can work individually in their own language, and in their own time. After instruction they can easily repeat their learning so that their knowledge remains at the optimum level. Additionally, they can easily forward the tool to others in their organisation and they can use it as a tool to inform persons from, for example, financial institutions.

4.2.9 Effectiveness

The computer-based training is a friendly tool for those who need to learn the basics of money laundering. The way in which the user can take knowledge is organised in such a way that it stimulates him/her to continue. The recipients of the analyst's training can take the programme back to their workplace. As the programme will be translated into the language of the beneficiary country, it will be a relatively simple matter to distribute the tool and the knowledge at a national level, which guarantees sustainability and ownership by them of the product.

5. ANCILLARY MATTERS

5.1 Cash Flow Forecast

A detailed cash flow overview can only be produced after discussions with the deliverers of the various inputs AFTER the Pre-Consortium Meeting.

Due to the development of the ambitions of the project and changes within both the project team and some activities, the cash flow forecast may have to be changed as the project progresses and after consultation with all stakeholders.

6. ANNEXES

- Project Work-Plan
- Contact details of the Project Team and the Consortium members *[available after Consortium pre-meeting]*
- Time schedule for the implementation of the work programme *[available after Consortium pre-meeting]*
- Budget overview per activity *[available after Consortium pre-meeting]*

6.1 Workplan

Work plan and inputs

Level	Description	Timing	Responsible
Overall objective	The project will contribute to the establishment of a fully functioning system to prevent and control money laundering in accordance with European and international standards by:		
Specific objectives	<ul style="list-style-type: none"> – Strengthening the Financial Monitoring Committee to enable it to exercise its functions in accordance with relevant regulations – Enhancing the capacities of the criminal justice institutions to carry out their functions within the anti-money laundering system and cooperate with the KFM – Supporting the financial sectors and other bodies required to report to help them meet their obligations in the prevention of money laundering and their cooperation with the KFM 		
Start-up activities			
0.0.1	Recruitment of Project Team	12/02 – 2/03	COE
0.0.2	Equip project offices	12/02 – 2/03	COE and KFM
0.0.3	Prepare a detailed work-plan and an inception report	12/02 – 4/03	KFM Project Team Leader
0.0.4	Organise a start up workshop	4/03	KFM
Project objective 1	To enable the Financial Monitoring Committee to exercise its functions in accordance with relevant regulations, including its tasks regarding information, coordination and international cooperation		
Output 1.1	The staff of the KFM (HQs and regional offices) have been trained in their respective tasks		
Activities			
1.1.1	Review training needs of KFM staff and develop a training plan <i>A comprehensive Training Need Analysis [TNA] within the KFM will be undertaken to include an extensive consultation process with all stakeholders in the anti money-laundering chain. This process will clearly identify the difference between the existing level of training of KFM staff and the operational needs of the organisation. Module 8</i>	1/03 - 1/05	KFM Project Team External Experts

1.1.2	<p>Select a core group of staff as trainers and resource persons from within the KFM and MVD police academy. Provide them with the resources to create a national training programme for use by all partners in the anti money laundering chain.</p> <p><i>Selected staff from the KFM and MVD Police Academies will be instructed to give financial investigation training at a national level.</i></p> <p><i>The students will receive a 5-day training course followed by a 3-day review workshop.</i></p> <p><i>This initiative provides the project with a particularly powerful, cost effective and sustainable methodology to create national training and to achieve the improvement of effective co-operation along the whole of the national anti-money laundering chain.</i></p> <p>Module 6</p>	4/03 – 4/04	KFM MVD Academy Project Team Consortium
1.1.3	<p>To further the knowledge gained in 1.1.2 above, arrange internships for the students in training establishments in EU countries to witness methods of training in financial investigation and related subjects.</p> <p><i>Follow-up to Module 6 training to ensure students are exposed to alternative styles and methods of training.</i></p>	4/04 –4/05	KFM MVD Project Team EU Partners
1.1.4	<p>Support the implementation of the training plan</p> <p><i>Ongoing support to students trained in 1.1.2/3 above to implement national training product and senior management adoption of the results of the TNA.</i></p>	6/03-5/05	KFM MVD Project Team
Output 1.2	The analytical capabilities of the KFM in the handling of reports from different agencies will have been strengthened		
Activities			
1.2.1	<p>Provide advice in reviewing options for analytical software</p> <p><i>Analytical software currently in use to be appraised as to functionality and recommendations made</i></p> <p><i>Assessment of level of training of staff in use of current analytical software.</i></p> <p><i>Assessment of training programmes for use of current analytical software.</i></p> <p>Procure the software chosen</p>	4/03 – 8/03	KFM Project Team Consortium
1.2.2		<i>Dependent on results of 1.2.1 above</i>	COE External Expert

1.2.3	Provide for the training of analysts in the use of analytical software. <i>It is intended that part of this activity will be executed in the form of a computer-based training programme, which makes it possible for the participants to easily transfer their new knowledge within their own country. By means of this technical assistance it will improve the target group's capacities in financial analysis and financial investigation. Module 4</i>	6/03 – 6/04	KFM Project Team Consortium
1.2.4	Design a training plan for analysts for 2003/2004 Module 4 training will provide the basis upon which a training plan for KFM analysts can be designed	6/03 – 5/05	KFM Project Team Consortium
1.2.5	Select a core group of up to six analysts to become trainers and resource persons. <i>Selected KFM analytical staff will receive training under Module 4 and will promulgate the knowledge gained to their colleagues.</i>	6/03 – 5/05	KFM Project Team Consortium
1.2.6	To further the knowledge gained in 1.2.3 above, arrange internships for the students to examine analytical activities in the FIUs of partner EU countries to witness methods of analysis and training of financial analysis techniques. <i>Follow-up to Module 4 training to ensure students are exposed to alternative styles of analysis and methods of training.</i>	6/04 – 5/05	KFM Project Team Consortium
1.2.7	Support the implementation of the training plan for up to 50 analysts at KFM HQs and regional offices	6/03-5/05	KFM Project Team
1.2.8	Organise up to 4 in-country seminars on the operational experience of other FIUs in the analysis of data and investigations of money laundering <i>To be dealt with by organising 4 typologies style meetings using inputs from analysts from foreign FIUs</i>	6/03–5/05	KFM Project Team Consortium
Output 1.3	Effective mechanisms are in place to improve co-ordination among the different services involved (financial sector supervision, law enforcement, etc.)		
Activities			

1.3.1	<p>Organise in-country seminars for representatives of the KFM, Economic Crime Department of the Ministry of Interior, Prosecutors and Judges, Central Bank and Supervisory Authorities, raising awareness of responsibilities and improving and enhancing inter-agency cooperation across the anti money laundering chain.</p> <p>These activities will be addressed within seminars and workshops arranged for the various institutions within the anti money laundering chain. Relevant modules are:</p> <p>Module 2 <i>Developing procedures on monitoring compliance, feedback and supply by the KFM to the partners in the anti-money laundering chain</i></p> <p>Module 3 <i>Training for employees of reporting institutions and professionals and their supervisory bodies</i></p> <p>Module 5 <i>Workshops directed at prosecutors and judges</i></p> <p>Module 6 <i>Training of personnel to perform the role of trainer within the organisations within the anti-money laundering chain</i></p> <p>Module 9 <i>Improving inter-agency co-operation between the KFM and law enforcement</i></p>	6/03 –4/05	KFM MVD Prosecutor's Office Supreme Court Central Bank Supervisory Authorities Project Team Consortium
1.3.2	Support measures to enhance information exchange based on this experience	6/03 – 4/05	KFM Project Team
1.3.3	Support regular joint reviews of the state of co-operation <i>Regular meetings between senior representatives of the various institutions and an ongoing evaluation process by KFM management</i>	3/03 - 5/05	KFM
1.3.4	Support the KFM in the organisation of joint seminars on specific issues of concern to co-operating agencies (e.g. on corporate criminal liability, further improvement of the anti-money laundering legislation and relevant regulations) <i>To be undertaken upon request and subject to budget considerations if knowledge gaps are identified at the conclusion of the various training activities undertaken under Modules 1, 2, 3, 5, and 6</i>	6/03 - 5/05	KFM Project Team Consortium
1.3.5	Organise a money laundering typologies meeting for the benefit of all institutions and organisations within the anti money laundering chain. <i>Assisting the KFM to organise and host the 2004 FATF typologies meeting that will be held in Russia will satisfy this activity.</i>	11/04	KFM Project Team Consortium

Output 1.4	Proposals will be available to further improve regulations related to the prevention and control of money laundering, as well as the tracing, search, seizure and confiscation of proceeds from crime in accordance with European and international standards			
Activities				
1.4.1	Support the review of the existing regulations to identify gaps and shortcomings <i>Workshops on legal and policy development to be undertaken under Module 1 will deal with this activity</i>	6/03, 6/04, 2/05		KFM Consortium
1.4.2	Assist in drafting proposals for amendments (legal opinions, workshops)	On request		KFM Consortium
Output 1.5	The Financial Monitoring Committee is cooperating and exchanging information with the FIUs of other countries			
Activities				
1.5.1	Support the organisation of a training seminar in Moscow on the cooperation between FIUs <i>A seminar with break out workshops dealing with co-operation between FIUs and in particular the KFM and FIUs in the CEECs and EU is dealt with in Module 7</i>	10/03		KFM Project Team Consortium
1.5.2	Support the organisation of an international seminar in the Russian Federation for FIU representatives from different European countries <i>Invitations to the seminar in 1.5.1 above will be issued to the Heads of FIUs in the CEECs, Consortium member's countries, and other selected EU states</i>	10/03		KFM Consortium Project Team
1.5.3	Support the conclusion of Memoranda of Understanding with foreign FIUs represented at the seminar	On Request		KFM Project Team
Output 1.6	Feasibility study and proposal for a follow up project available			
Activities				
1.6.1	Carry out an analysis in view of additional technical assistance needs <i>Continual analysis and evaluation of the outputs and activities of the project will assist in determining whether and to what extent the overall and specific objectives have been met and in identifying gaps in skills levels or technical assistance requirements - Module 8</i>	4/03 – 4/05		KFM Project Team
1.6.2	Prepare a feasibility study including terms of reference for a follow up technical cooperation project Module 8	4/03 – 4/05		KFM Project Team
Project objective 2	To enhance the capacities of the criminal justice system to cooperate with the KFM within the anti-money laundering system			

Output 2.1	Law enforcement and criminal justice officials have a better understanding of the role of their institutions in the anti-money laundering system of the Russian Federation and cooperate with the KFM			
Activities				
2.1.1	Assist in developing training materials on the role of law enforcement and criminal justice agencies in the anti-money laundering system, and the application of the relevant European and international directives <i>Training of personnel to perform the role of trainer under Module 6 includes:</i> <i>Awareness of the applicable laws and process</i> <i>Case management skills – the recording of policy, decisions and actions</i> <i>Knowledge of law enforcement competence, financial institutions and processes</i> <i>Management of financial intelligence sources, handling intelligence, risk assessments, confidentiality issues</i>	2/04 – 4/05		KFM Project Team Consortium
2.1.2	Organise study visits for law enforcement officers and KFM staff to counterpart organisations of other European countries to become trainers and resource persons Module 6 is designed to enable the selected trainers to develop training in Russia to Russian needs. Once selected trainers have received this training it is intended that they travel abroad to witness similar training elsewhere [1.1.3]	4/04 – 4/05		KFM Project Team Consortium
2.1.3	Assist the KFM in Moscow and the regional offices in the organisation of seminars for law enforcement institutions involving those officials having participated in the study visits as resource persons/trainers	4/ 04 - 4/05		KFM Project Team
2.1.4	Support given to students trained within Module 6 to practice their knowledge and skills in the workplace Support the role of KFM in the provision of feedback to the reporting institutions and the monitoring of feedback and follow up activity by law enforcement in consequence of the receipt of KFM reports. <i>Developing procedures on monitoring compliance, feedback and supply of information by the FIU to the partners in the anti-money laundering chain is covered within Module 2</i> To enable the financial sectors and other bodies required to report to meet reporting, customer identification and other obligations, and cooperate with the KFM	9/03-4/05		KFM Project Team Consortium
Project objective 3				
Output 3.1	The financial sector and other relevant bodies have an increased awareness of the problem of money laundering, how to recognise it and how to protect a financial institution against it			
Activities				

3.1.1	Provide training and assist in developing materials and guidelines for financial institutions and other bodies required to report on money laundering issues in general <i>The target group are personnel in the reporting institutions and / or compliance officers and representatives of supervising institutions. This activity can be achieved by delivering a course that has been developed by Luxembourg's financial sector. Module 3</i>	11/03 – 11/04	KFM Central Bank Financial Services Sector Project Team Consortium
3.1.2	In cooperation with supervisory bodies and professional associations support a series of workshops for the staff of financial institutions in the various regions of the Russian Federation Module 3	11/03– 11/04	KFM Project Team Consortium Central Bank Financial Services Sector
3.1.3	Support the dissemination of information, materials and guidelines, among other things, through electronic media (including internet)	6/03 – 4/05	KFM Project Team Consortium
Output 3.2	Financial institutions meet their reporting obligations towards the Financial Monitoring Committee and cooperate with the criminal justice system		
Activities			
3.2.1	Support the development of materials and practical guidelines for institutions required to report in view of meeting reporting requirements and in view of detecting suspicious transactions <i>The target group are personnel in the reporting institutions and / or compliance officers and representatives of supervising institutions. This activity can be achieved by delivering a course that has been developed by Luxembourg's financial sector. Module 3</i>	11/03 -11/04	KFM Project Team Consortium Central Bank Financial Services Sector
3.2.2	In cooperation with relevant training institutions provide training opportunities for trainers of key institutions and professional associations <i>As a direct consequence of activities undertaken within Module 6 a national training resource will be established which will be able to facilitate this initiative.</i>	4/04 – 4/05	KFM MVD
3.2.3	Assist in managing an on-line help line for financial institutions	6/03 – 4/05	KFM

