

MOLI-Serbia- Workplan of Activities

Council of Europe
Conseil de l'Europe



European Union
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**“Project against Money Laundering and Terrorist Financing in Serbia”
(MOLI-Serbia)**

Workplan of Activities

Version of 24 March 2011

Overall Objective: To contribute to democracy and the rule of law through the prevention and control of money laundering and terrorist financing and other forms of economic and financial crimes in Serbia in accordance with European and other international standards.

Project Purpose: To enhance the capacities of the anti-money laundering and terrorist financing system in Serbia in terms of legislation, skills, and operational capacities.

Project title: MOLI-Serbia	Contract No: CRIS/2010/252-978	Country: Serbia
Planning period: 15 November 2010-15 November 2013	Prepared on: January/February 2011	Contractor: Council of Europe

Time Framed Actions within Activities contributing to the Expected Results

	3 Years	Year 2010		Year 2011												Year 2012	Year 2013	
		nov	dec	jan	feb	mar	apr	may	jun	july	aug	sep	oct	nov	dec			
ER 0	Inception Phase																	
Activity 1	Preparation and delivery of the Workplan	Start-up Activities			x													
		Design of workplan			x	x												
		Finalization and approval by Steering Committee				x	x											
Activity 2	Recruitment and establishment of the project team	Recruitment of the LPO			x													
		Recruitment of the LPA			x													
		Recruitment of the LTC				x												
		Assignment of Project Manager	x															
		Recruitment of Project Assistant			x													

3 Years		Year 2010		Year 2011												Year 2012	Year 2013
36 Months		nov	dec	jan	feb	mar	apr	may	jun	july	aug	sep	oct	nov	dec		
Activity 3	Organisation of the start up event					x											
	Start up-Workshop and 1 st Steering Committee Meeting																
	High level and awareness launching conference							x									
ER 1	Legislative proposals available to make Serbian legislation complaint with the applicable European and international standards																
Activity 1.1: Analyse Serbian legislation and practice and provide support in the preparation of the necessary legislative drafts as indicated by the National AML Strategy.																	
Action 1.1.1	Establish a Legal Review Working Group (LRG) of 6-8 legislative AML/CFT experts on Criminal Law and Commercial Law area. The group composed of 4-6 national and 1-2 international to initiate and review the relevant legislation and frameworks as in 1.1.2 and 1.1.3 below in line with EU and international standards.						x	x									
Action 1.1.2	Review of the existing legal framework and make recommendations related to improvement of the legislation and of drafting new provisions in the areas of: Financing of terrorism; Insider trading; Market manipulations; and Relevant provisions on CC and CPC Codes.						x	x	x				x	x	x	x	x
Action 1.1.3	Review and Analyse the existing legislation, and where appropriate, recommend changes or introduction of new policies or legislation concerning: Bylaws regulating insurance; Law on business registries (at the drafting stage); Law on tax administration and tax procedures;						x	x					x	x		x	x

	3 Years	Year 2010		Year 2011												Year 2012	Year 2013	
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	36 Months																	
	Analysis of the laws in the area of supervision and international legal assistance/cooperation (as envisaged by the National AML strategy) Elaboration of a Feasibility Study on of Electronic transfers (Law on Money Transfers);																	
Participating institutions	APML*, Ministry of Justice, Court of Cassation, Prosecutor's Office																	
	Activity 1.2: Organise a series of training events on practical implementation of new European AML/CFT standards, Convention CETS 198 and application of new standards and procedures for a core group of staff and of the Legal Review Working Groups (LRG).																	
Action 1.2.1	Training Event No. 1 for up to 30 Participants on: European AML/CFT standards, Implementation aspects of the Convention CETS 198 and their application in the national Serbian legislation and AML System								x									
Action 1.2.2	Training Event No. 2 for up to 30 Participants on: European AML/CFT standards, Implementation aspects of the Convention CETS 198 and their application in the national Serbian legislation and AML System															x		
Action 1.2.3	Training Event No. 3 for up to 30 Participants on: European AML/CFT standards, Implementation aspects of the Convention CETS 198 and their application in the national Serbian legislation and AML System																x	
Action 1.2.4	Training Event No. 4 for up to 30 Participants on: European AML/CFT standards, Implementation aspects of the Convention CETS 198 and their application in the national Serbian legislation and AML System																	x
Participating institutions	APML, Ministry of Justice, Court of Cassation, Prosecutor's Office, Ministry of Interior, Police Academy, Judicial Academy																	
ER 2	Increased public support to efforts to prevent and control economic crime																	
	Activity 2.1: Ensure and enhance the visibility and transparency of the AML/CFT system and in particular that of AMLP through distribution of information materials and through training the staff in relevant public agencies in media relations and in the provision of information to the public.																	

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Action 2.1.1	Design of information leaflets on AML/ CFT system and APML relevance for: a) State central and local Institutions; b) Public/ civil society							x									x	x
Action 2.1.2	Establish a professional website for the APML, to enable it to share information of its activities and promote awareness of the AML/CFT system in both Serbian and English languages.								x								x	x
Action 2.1.3	Organisation of 1 Training Event for government public relations officers on adequate presentation of AML/ CFT issues and AML/ CFT activity reporting to the public and relevant institutions.											x					x	
Participating institutions	APML, National Bank of Serbia (NBS), Prosecutors' Office, Ministry of Justice, Association of Serbian Banks, Serbian Association of Accountants and Auditors																	
Activity 2.2: Organise awareness raising activities for politicians and public to publicise the efforts undertaken by the state to increase the effectiveness of the fight against economic crime, money-laundering and terrorist financing																		
Action 2.2.1	Organise 1 Awareness Raising Event for the media on AML/CFT activities and the functioning of relevant institutions in the AML /CFT system.											x						
Action 2.2.2	Publish publicity material for the benefit of civil society (public) informing them on AML/CFT issues including the reporting of suspicious activity.															x		
Action 2.2.3	Organise 1 Awareness Raising Event for Members of Parliament on aspects of the fight against AML/CFT and on the functioning of the AML/CFT institutions.																x	
Participating institutions	APML, Ministry of Justice, Police Academy, Judicial Academy, Supervising Institutions																	
Activity 2.3: Undertake up to 5 (five) research studies on the risks and typologies of money laundering and those of financing terrorism																		

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36 Months																		
Action 2.3.1	Organise, carry out, present a research study regarding risks of formal and informal money transfers							X						X	X	X	X	
Action 2.3.2	Organise, carry out, present a research study regarding risks of money laundering and typologies in property and real estate transactions and trade-based money laundering													X	X	X	X	
Action 2.3.3	Organise, carry out, present a research study regarding risks of money laundering and terrorism financing typologies regarding abuse of Non-Profit Organisations for money laundering purposes							X									X	
Action 2.3.4	Organise, carry out, present a research study regarding risks of money laundering and typologies in the area Sports																	X
Action 2.3.5	Organise, carry out, present a research study regarding possibilities and typologies of the Financing of Terrorism in Serbia																	X
Action 2.3.6	Compilation, translations (Serbian-English-Serbian), publication and dissemination of not less than 600 copies of those 5 Studies/Typologies																	X
Participating institutions	APML, Ministry of Interior, Prosecutor's Office, and Relevant Sector Supervisors e.g. Foreign Exchange Inspectorate (FEI), State Security Agencies (Intelligent agencies), Custom Administration, Tax Administration, Serbian Business Registry Agency																	
ER 3	Capacities of the APML to carry out its work in line with the AML/CFT legislation and Moneyval Recommendations is increased																	
Activity 3.1:	Support the APML in preparing further training plans for their staff, train selected APML staff as trainers and assist them in delivering training courses for the staff of other AML/CFT system participants																	
Action 3.1.1	Assessment of training capacities, needs, plans and development of training plans (outcome of this action to serve also to (Action 4.2.1)						X	X										
Action 3.1.2	Development of training curricula based on the Need Assessment with focus on specific topics such as: Risk based Approach (PEPs etc)										X	X						

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	Cross border issues Evidence gathering and presentation																	
Action 3.1.3	Organise 1 Training of Trainers Event. (Trainers/trainees to be identified during the Need Assessment)																X	
Action 3.1.4	Organise 2-3 Training Events for APML's employees in cooperation with the Ministry of the Interior, Judicial Academy, Police Academy and Prosecutors.																X	
Participating institutions	APML, Ministry of Interior, Judicial Academy, Police Academy, Prosecutor Office, Customs, Reporting Institutions																	
Activity 3.2: Organise up to 5 multi-agency study visits to the CoE Member States to provide first-hand experience to overcoming difficulties in the implementation of international AML/CFT standards																		
Action 3.2.1	Identify Countries and Structures in order to organise and carry out up to 3 study visits for APML's purposes which would be aimed at resulting in MOU initiation/launching/signature with other FIUs.						X							X				
Action 3.2.2	Identify Structures and good practices for 1 Study visit for the Police / Judicial Academy to an academic institution/university that offers postgraduate study in economic crime.																	
Action 3.2.3	Organise 1 study visit for Customs / Police to a European jurisdiction that is specialized on the use of cash detection dogs.																	
Participating institutions	APML, Ministry of Interior, Police Academy, Customs																	
Activity 3.3: Train the analytical staff of the FIUs on analysis and exchange of financial information and provide translated and published compilation of FATF typologies into Serbian language.																		
Action 3.3.1	Review and analyse existing capacities and identity needs of and for the analytical staff of the FIU when carrying out their tasks and more specifically when conducting analysis and exchange of information																X	

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Action 3.3.2	Provision of 1 Training Event for training 5-8 Trainers of the analysts on carrying out analysis and exchange of financial information																X	
Action 3.3.3	Deliver 2 Training Events for analysts, one in Serbia and one to a foreign FIU aimed at improving international cooperation on exchange of financial information																X	
Action 3.3.4	Translate, publish (electronically and hard copy), FATF/Moneyval/EAG typologies into Serbian language.										X						X	
Participating institutions	APML																	
ER 4	Capacity of law enforcement agencies, relevant service of the MOF and judiciary to detect, investigate, prosecute and adjudicate in the money-laundering, terrorist financing and economic crime cases (including tracing criminal money on the internet) is increased																	
Activity 4.1:	In co-operation with the specialised training institutions in Serbia, support the preparation of training programmes/curricula and training materials on AML/CFT for the law enforcement agencies and judiciary indicated by Moneyval recommendations																	
Action 4.1.1	Organisation and provision of 1 MOCK TRIAL training for multi-agency staff (Reporting institutions, Regulators/supervisors, FIU, Law Enforcement, Prosecutors, and Judiciary).									X								
Action 4.1.2	Organisation and provision (by FIU and other international experts) of 1 training (3-5 events), including all relevant Prosecutors in the country on topics: Forensic Accounting Risk based approach (PEPs etc) Evidence gathering and presentation Cross border issues											X	X	X	X		X	
Action 4.1.3	Adaptation and Publication of the 2 raining programmes that are delivered from (Action 4.1.1) and (Action 4.1.2) and delivering it to the Judicial and Police Academies																	X

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Participating institutions	APML, National Bank of Serbia (NBS), Reporting Institutions, Ministry of Interior, Prosecutors' Office, Judges and Police and Judicial Academies, Custom Administration, Tax Administration (Tax police)																
Activity 4.2: Deliver specialised training for multidisciplinary professional groups in order to increase practical implementation aspect of AML/CFT issues																	
Action 4.2.1	Using Need Assessment under (Action 3.1.1) organise and carry out 2 Training Events for a multi-disciplinary group on issues of economic and financial crime, AML/CFT and related topics to prosecutors, judges, staff of the law enforcement and financial investigation units.															X	X
Participating institutions	APML, Ministry of Interior, Prosecutors' Office, Judges and Judicial Academy, Reporting Entities (through their associations)																
ER 5	The capacity of regulators, supervisors and obliged institutions to fulfil their obligations under the AML/CFT legislation, to implement the Moneyval recommendations and take measures based on risk analyse is increased																
Activity 5.1: Assist the supervisors and regulators in the determination of national standards of compliance with relevant legislation and international standards, producing guidelines and indicators for obliged institutions and implementing the relevant Moneyval recommendations																	
Action 5.1.1	Scoping paper on all identified institutions reviewing, assessing and compiling all national existing standards for supervisors and regulators with an emphasis on risk-based supervision						X		X							X	
Action 5.1.2	Based on the identification of issues of concern through the scoping paper, prepare compilation of guidelines in implementing the national existing standards for supervisors and regulators with an emphasis on risk-based supervision															X	
Participating institutions	APML, National Bank of Serbia (NBS), Reporting Institutions and Individual Sector Supervisors																

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Activity 5.2:	Provide 3 workshops for the regulators/supervisors on best practices available in other European countries, on the application of the risk-based approach in the internal AML/CFT policies, and on Training Plan Modules for curricula of obliged institutions.																
Action 5.2.1	Organise and carry out 1st/3 Workshop using the existing compilation of the guidelines and of the European good practices for all representatives of the regulators and supervisors									X							
Action 5.2.2	Organise and carry out 2 nd /3 Workshop on application of risk-based approach in the internal AML/CFT policies												X				
Action 5.2.3	Organise and carry out 3 rd /3 Workshop on assisting the obliged institutions in designing and elaborating a compilation and training plan for the curricula developments for the obliged institutions.															X	
Participating institutions	APML, National Bank of Serbia (NBS), Reporting Institutions and Individual Sector Supervisors																
ER 6	Mechanisms and procedures reinforced for interagency cooperation and information exchange within the relevant bodies of the AML/CTF system in Serbia, including between public and private sector																
Activity 6:	Prepare and make available Situation Report on the Typologies, data collection, analysis and exchange of information including both public and private sector in Serbia																
Action 6.1.1	Organise 3 regional typology meetings with law enforcement and regulatory authorities								X							X	X
Action 6.1.2	Undertake assessment and propose improvements by way of guidance papers followed by a workshop on the system of data collection and analysis, information exchange and feedback between relevant services and institutions (including private sector)									X					X		X
Action 6.1.3	Support the APML in drafting a new AML/TF national strategy (2012-2015).															X	X
Action 6.1.4	Set up a working group to develop the forms for providing data on economic and criminal offences related to ML and TF (APML,							X								X	X

	3 Years	Year 2010		Year 2011												Year 2012	Year 2013
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	Prosecutors' Office, Supreme Court of Cassation)																
Participating institutions	APML, Ministry of Justice (6.1.3) , Ministry of Interior, Prosecutors' Office, National Bank of Serbia (NBS), Court of Cassation (6.1.4), Reporting Institutions (6.1.2), Securities Commission and other supervisors, Intelligence Agencies																
ER 7	Technical infrastructure improved to collect, analyse and exchange information necessary to prevent and control money laundering, terrorist financing and predicate financial crimes																
Activity 7.1: Assess IT infrastructure needs to manage information flow across the network																	
Action 7.1.1	Assessment specifically shall address: Disaster Recovery Oracle BI and Integration with Alfresco CMS Automatic Analysis of transactions database Development of New website						X	X	X								
Action 7.1.2	Produce detailed technical specifications for the necessary equipment and software									X	X	X					
Activity 7.2: Procure necessary software and provide training on its use																	
Action 7.2.1	Carry out procurement of software and make any adjustments necessary for efficient use of procured equipment and software												X	X	X		
Action 7.2.2	Provide training for all users of the new Software												X	X	X	X	
Participating institutions	APML and Reporting Institutions																

* APML is the main beneficiary and the MOLI-Serbia national project coordinator and thus has overall responsibility for implementation of the activities in the workplan.