



Controlling Corruption through Law Enforcement and Prevention Project (CLEP)

Activity Report – 5

SYNOPSIS OF THE PROJECT ACTIVITY

Implementing entity:

Economic Crime and Cooperation Division, Action against Crime Department, Information Society and Action against Crime Directorate, DGI – Human Rights and Rule of Law

Type of activity:

Training of Trainers for banks compliance officers: compliance programmes for front office staff (activity 1.3.5.)

Programme/Project:

Controlling Corruption through Law Enforcement and Prevention

Country/Region:

Republic of Moldova

Date and place:

27-29 May 2019, Chisinau, Republic of Moldova

Council of Europe Secretariat:

Giulia Re & Nadejda Plamadeala

Participants:

4 men and 14 women

Total number of participants:

18

Partner institutions/organisations:

Moldovan commercial banks, Financial Intelligence Unit (FIU) and the National Bank of Moldova.

Objectives:

To equip compliance officers from Moldovan commercial banks with necessary knowledge and skills to train front office staff on anti-money laundering (AML) compliance and requirements.

General Assessment:

During the first day of the training, the FIU presented updates in the AML requirements for banks and discussed improvements and weaknesses to be remedied with the participants. The CoE trainers focused on training techniques, effective communication with front office and explanation

of respective roles, expectations and difficulties faced in their daily work. The internal setup of a bank, including governance, internal reporting, risk analysis, risk based rules and procedures, internal compliance controls, was presented from the perspective of both compliance officers and front office staff. The second day focused on the role of compliance programmes and on how to work effectively with front office on customer due diligence, internal controls and beneficial ownership. Lastly, the third day was dedicated to transactions monitoring, suspicious transactions and the role of the front office in these matters. The programme foresaw group exercises and role plays, designed for compliance officers to better understand the topics and front office's perspective.

Results/conclusions:

The training was designed for both clarifying relevant AML concepts for compliance officers, including from a front office perspective, and for further increasing compliance officers' training skills. The activity successfully built participants' confidence in organizing internal AML trainings as well as in explaining difficult concepts to a less specialized audience. The training materials, which can be adapted and used for banks' internal trainings, were circulated to all participants.

Agenda:

See attached.