



Planned Action

Implementation phase – indicative steps of assessment

The entire Assessment period/implementation phase will last 21 months and will include the reviews for the remaining 27 Member-States (after one out of 28 members having been assessed at the pilot phase). Each Member State (28 EU Member States) shall be reviewed according to the following schedule:

Week	Key Milestones	
	<i>Assessed Member State</i>	<i>Council of Europe</i>
As soon as possible at the beginning of the process	<ul style="list-style-type: none"> - Country to assign contact point for the assessment process - Commence the gathering of responses to questionnaires 	<ul style="list-style-type: none"> - Send relevant template questionnaires to country - Initiate preparation of a scoping note for areas of increased focus -
At least 6 weeks to on-site	Respond to questionnaire and provide information on institutional framework, statistics, cases, risk and context.	
At least 4 weeks to on-site	Contact point to engage with Secretariat to prepare for the on-site.	<ul style="list-style-type: none"> - Prepare draft scoping note to identify priorities for the on-site visit - Submit additional questions to country - Submit a list of relevant institutions to participate in the on-site interviews.
At least 3 weeks to on-site	Country to provide responses to any outstanding questions from the assessment team.	

Week	Key Milestones	
	<i>Assessed Member State</i>	<i>Council of Europe</i>
	Prepare draft on-site programme, including logistics arrangements with Secretariat.	
At least one week to on-site		<ul style="list-style-type: none"> - Finalise the draft scoping note - Finalise the draft on-site programme.
On-site visit		
<p><u>Duration:</u> the length of the on-site visit will depend on the financial sector and risk profile of the country; length of visits will be an average of 3 days.</p>		
<p><u>Potential interlocutors:</u> AML/CFT Policy making authorities, Financial Intelligence Unit (analysis sector, supervisory sector, interagency information exchange sector, international cooperation sector); institutions using the disseminated financial intelligence; financial sector supervisors; DNFBP sector supervisors; BO/Business registration agency; financial institutions; DNFBPs</p>		
<p><u>Meeting logistics:</u> Meetings with financial institutions and DNFBPs to be held without participation of government officials.</p>		
At most 4 weeks following on-site		CoE to prepare the 1 st draft assessment report and submit to country for comments
At most 5 weeks following on-site	Country to provide comments	
At most 6 weeks following on-site		Consolidate, assess and finalise 2 nd draft assessment report. Finalise a draft Summary Report. <i>(Draft reports for assessment of each Member State to be provided as part of the interim reports. Final reports for each Member State to be provided to EC upon completion of the full 24-month cycle after updating for consistency.)</i>