



# AML/CFT 101

## The On-Site Visit

CFATF Secretariat Research Desk  
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Forming an Agenda



Preparation &  
Management of the  
Team



The Interviews



De-briefing meetings



# The On-site

# Forming an Agenda (1)



## Forming an Agenda (2)

- 16 weeks prior to onsite – the team receives effectiveness information.
- 10 weeks prior to onsite – team identifies additional information that is needed based on initial analysis.
- 9 weeks prior to onsite – country provides proposed list of entities to participate in onsite.
- Continued liaison between team and assessed country regarding the list (facilitated and guided by the Secretariat).

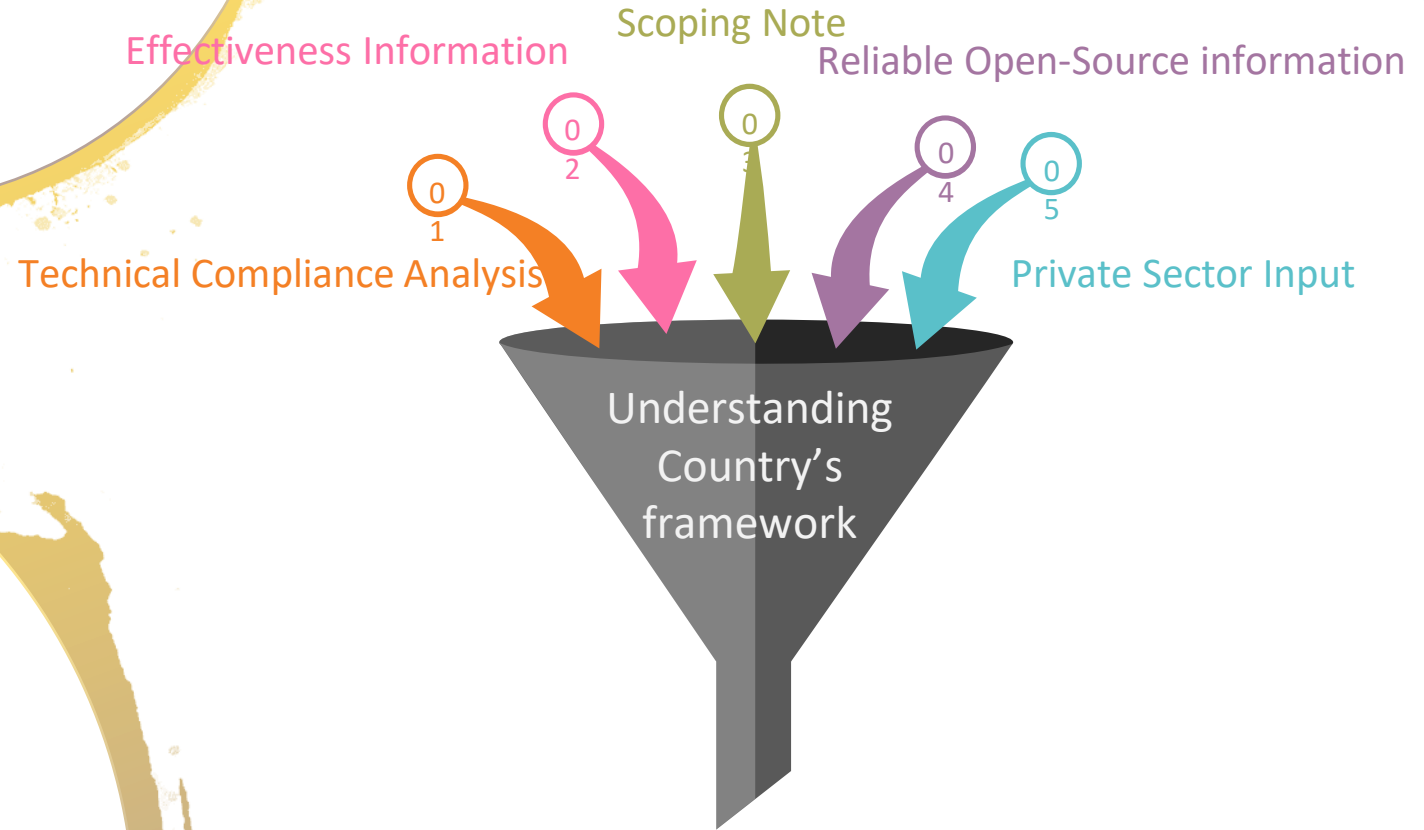
# Forming an Agenda (3)

- CFATF Procedures has a Table Template as an appendix to commence the process.

NO.	PROPOSED INTERVIEWEES	COMMENTS
1.	NAMLC	<ul style="list-style-type: none"> <li>National Coordinating Body</li> </ul>
2.	Attorney General's Chambers	<ul style="list-style-type: none"> <li>Central Authority – responsible for mutual legal assistance;</li> <li>Assists the Minister (who is the Enforcement Authority) to carry out civil asset recovery</li> </ul>
3.	Governor's Office  - Representative from the Judiciary  - Representative with responsibility for TFS	
4.	Barristers & Accountants AML/ATF Board	Supervisor for lawyers and accountants.
5	Bermuda Police Service –  - Commissioner of Police	Law Enforcement authority

- There is also another appendix with examples of agencies typically involved in onsite: Government agencies/ministries; Criminal justice and operational agencies; Financial sector bodies; DNFBP and other matters.

# Forming an Agenda (4)



Categories of Agencies

Role in framework

Persons to address technical questions about policies and implementation (primarily)

# Forming an Agenda (5)



- The Secretariat should give the assessed country a choice of times for the interviews, being respectful of the availability of persons.
- The Secretariat should also provide the assessed country with a rough estimate of the amount of time each interview will take – try to identify period for interviews and periods for review of documents.
- Being methodical helps both the assessment team and the assessed country; the order and timing is important.

# Preparing & Managing the assessment team



Secretariat throughout the process:

- ✓ Assesses each team member – personal and technical strengths & weaknesses.
- ✓ Manages each team member based upon identified qualities.
- ✓ Promotes team-work and support team Members.

# Preparing & Managing the assessment team (3)

- **Pre-Onsite Training / Interview Plans:**
  - ✓ Review of each IO and all Core Issues.
  - ✓ Discuss the schedule: who needs to be interviewed and in what order?
  - ✓ Establish what material is already available.
  - ✓ Decide on what the aims and objectives of each interview are - what additional information should now be obtained?
  - ✓ Create a comprehensive list of interview questions for each interview.



# Preparing & Managing the assessment team (4)

## Interview Plans:

Identify lead interviewer for each interview.

Agree to the structure of the interviews – when will others ask questions?

Agree to protocols – introductions etc.

# Preparing & Managing the assessment team (5)

- The interviews:
  - ✓ Professionalism and integrity.
  - ✓ Begin by establishing a baseline by asking simple, easy-to-answer questions (background info); open-ended questions.
  - ✓ Avoid questions at the beginning that can be answered with a yes or no.
  - ✓ Ask simple questions that address one fact at a time, rather than combining more than one idea into the same question.
- Asking Questions:
  - ✓ Practise self-awareness by identifying your own potential biases and putting them aside while conducting the interview.
  - ✓ Proceed in chronological order to ensure nothing is missed.
  - ✓ Ask for clarification and more detail on any vague points.
  - ✓ Ask follow-up questions to establish more facts.

# Preparing & Managing the assessment team (6)

- Time Management during interviews:

- ✓ Secretariat takes the lead with respect to monitoring and managing the time.
- ✓ Using different types of questioning to close in information:
  - open-ended (Tell me', 'Describe', 'Explain').
  - specific-closed: used to elicit information that an interviewee has not yet provided in response to open-ended questions (who does....?).

# The Private Sector

- Structured Formats IO.4 - Checklist for FIs and DNFBPs.
- Structured Formats IO.4- Questionnaire for Assessed Country.
- Satisfy the interviewees regarding confidentiality.
- Explanation of the process.

# Team & De-briefing meetings



Short summary meetings held after every interview (as far as possible).

At the end of every day:

- to review experiences of the day (good & bad).
- to ascertain information obtained & initial analysis /findings.
- to identify additional information needed and to be requested.
- to assess plan for upcoming interviews.

# Outcomes of On-site – Initial Key Findings

These will not be provided to the country at this stage however, they need to be:

- Concise.
- Preliminary status emphasized.
- Balanced – positive findings / conclusions with areas for improvement.

