

Data and Statistics Collection

*Information Sharing Roundtable Discussion:
Assessing Money Laundering and Terrorist Financing Risks*

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Building stronger partnerships
for a more secure world

Organized Data Collection Efforts

- The systematic collection of quantitative data can play a crucial role in assessing the effectiveness of a country's AML/CFT system and it is key in a ML/FT National Risk Assessment
 - IMF study conducted in 2010-2011 for 156 countries shows that only 25 countries maintain statistics on at least seven of eight common indicators (ML/TF investigations, prosecutions, convictions and investigations involving STRs; value of frozen/seized and confiscated/forfeited assets; value of fines on reporting entities; number of information exchanges with foreign FIUs)

Main challenges in AML/CFT data collection

- Multiple stakeholders
- Incompatible data
- Definitional Issues
- Limited Guidance

Data Quality

- Data quality is evaluated along six dimensions:
 - Relevance
 - Accuracy
 - Comparability
 - Timeliness/punctuality
 - Accessibility/clarity
 - Coherence

Quantitative vs. Qualitative Data

- Statistics (quantitative data)
- Expert assessments solicited through surveys and questionnaires (qualitative data)
- The use of each type of data has advantages and disadvantages

Source of Quantitative Data

- Crime and criminal justice statistics
- STR and other reporting statistics
- General financial sector characteristics
- General economic statistics (including from IMF/WB databases)
- Other general statistics (e.g., on human development, infrastructure etc)

Examples of Quantitative Data

- Number of money laundering convictions
- Number of money laundering prosecutions
- Number of money laundering investigations
- Number of suspicious transaction reports (STRs)
- Total amount of seized and frozen assets
- Total amount of confiscated assets
- Number of Mutual Legal Assistance (MLA) Requests (incoming and outgoing)
- Total amounts associated with the MLA Requests (incoming and outgoing)
- Total amount of cross-border cash declarations (incoming and outgoing)
- Total number of currency/bearer negotiable instruments (BNI) (Customs data from declaration/disclosures)
- Total seized or confiscated amount of currency/BNI (Customs)

Examples of quantitative data (customers of Financial Institutions and Designated Non-Financial Businesses and Professions)

- Domestic/International Politically Exposed Persons;
- High net worth individuals;
- Non residents clients, particularly from high-risk jurisdictions;
- Clients with foreign business;
- Clients with criminal records or past administrative and/or supervisory actions against them;
- Clients with business links to known high-risk jurisdictions;
- Businesses with complex, non transparent ownership structure;
- Clients through introduced business or correspondent banking, particularly from unregulated professional intermediaries or regulated intermediaries in jurisdictions with low AML controls)

Data collation and mapping

- Countries should create a mechanism to organize and lead the data collection effort (mapping the available data; identify gaps and develop a list of indicators that each agency/reporting institution should collect)
 - Determine the unit of measurement
 - Consider the dissemination of template data collection tables
 - Create indicators that disaggregate data according to several relevant breakdowns

Examples (Criminal Justice Systems)

- Determine whether ML and TF investigations, prosecutions and convictions should be reported as the number of cases and/or as the number of individuals investigated, prosecuted and convicted
- Self laundering/third party laundering
- Highlight the existence of TF investigated/prosecuted/convicted as an independent offence
- Average time it takes to complete investigations of ML/TF offences
- Types of sentencing
- Freezing, seizure and confiscation (including the specific reporting period)

Examples (ML and Predicate Offences)

Data Year: 20__	Indicator	Predicate Offences Categories																			ML only	Total Predicate Offence / ML						
		Organised crime	Terrorism	Human trafficking	Sexual exploitation	Drug trafficking	Arms trafficking	Trafficking in stolen goods	Corruption/bribery	Fraud	Counterfeiting of currency	Counterfeiting and piracy of products	Environmental crime	Murder, grievous bodily injury	Kidnapping	Robbery/theft	Smuggling	Tax crimes	Extortion	Forgery			Piracy	Insider trading and market manipulation	Other offence categories (add ²)			
2.1 ML/Predicate Offence Investigations	2.1.1	No. of cases investigated for the predicate offence																										
	2.1.2	No. of cases investigated for ML																										
	2.1.3	No. of individuals investigated for the predicate offence																										
	2.1.4	No. of individuals investigated for ML																										
	2.1.5	No. of investigation cases for ML initiated by STRs																										
	2.1.6	No. of investigation cases for ML where STR data was used ¹																										

¹ Including investigations initiated by STRs.

² Add as many columns as necessary to include all categories of predicate offences.

Examples (ML and predicate offences)

Data Year: 20__	Indicator	Predicate Offences Categories																		ML only	Total Predicate Offence / ML					
		Organised crime	Terrorism	Human trafficking	Sexual exploitation	Drug trafficking	Arms trafficking	Trafficking in stolen goods	Corruption/bribery	Fraud	Counterfeiting of currency	Counterfeiting and piracy of products	Environmental crime	Murder, grievous bodily injury	Kidnapping	Robbery/theft	Smuggling	Tax crimes	Extortion			Forgery	Piracy	Insider trading and market manipulation	Other offence categories (add?)	
2.2 ML/Predicate Offence Prosecutions	2.2.1	No. of cases prosecuted for the predicate offence																								
	2.2.2	No. of cases prosecuted for ML																								
	2.2.3	No. of individuals prosecuted for the predicate offence																								
	2.2.4	No. of individuals prosecuted for ML																								
	2.2.5	No. of prosecution cases for ML initiated by STRs																								
	2.2.6	No. of prosecution cases for ML where STR data was used																								
	2.2.7	No. of ML investigation cases that resulted in prosecution for the predicate offence only																								
	2.2.8-2.2.12	No. of prosecution cases in which a reason ¹ for not pursuing ML charges was:																								
	2.2.8	Reason: No evidence of ML																								
	2.2.9	Reason: Not enough evidence to meet the burden of proof for ML																								
	2.2.10	Reason: ML prosecution too costly or time consuming																								
	2.2.11	Reason: Marginal sentences for ML convictions compared to predicate offence																								
	2.2.12	Reason: (Add common reasons as necessary)																								

Examples (Seizure and Confiscation)

Data Year: 20__	Indicator	Primary (Single) ¹ Underlying Offence																				Total Predicate Offence / ML / TF				
		Predicate Offences Categories																								
		Organised crime	Terrorism	Human trafficking	Sexual exploitation	Drug trafficking	Arms trafficking	Trafficking in stolen goods	Corruption/bribery	Fraud	Counterfeiting of currency	Counterfeiting and piracy of products	Environmental crime	Murder, grievous bodily injury	Kidnapping	Robbery/theft	Smuggling	Tax crimes	Extortion	Forgery	Piracy		Insider trading and market manipulation	Other offence categories (add ²)	ML only	TF only
3.1 Asset Freezing	3.1.1	No. of asset freezing cases																								
	3.1.2	No. of individuals who were subject to asset freezing																								
	3.1.3	Value of frozen assets (in USD)																								
3.2 Asset Seizing	3.2.1	No. of asset seizing cases																								
	3.2.2	No. of individuals who were subject to asset seizing																								
	3.2.3	Value of seized assets (in USD)																								
3.3 Asset Confiscation	3.3.1	No. of asset confiscation and forfeiture cases																								
	3.3.2	No. of individuals who were subject to asset confiscation and forfeiture																								
	3.3.3	Value of confiscated and forfeited assets (in USD)																								

Examples (FIU)

- STRs and other information received
- Queries to reporting entities
- Exchange of information (domestic and international)
- Cases disseminated to competent authorities

Examples (FIU)

Data Year: 20__	Indicator	Categories of Reporting Entities and Agencies																				Total Fis, DNFbps, Other Entities, and Gov.		
		Financial Institutions (FIs)							DNFBPs							Other		Gov. Agencies						
		Banks	Non-bank deposit takers	Securities industry	Insurance industry	Money Services Businesses (MSBs)	Other financial institutions (add)	Total Fis	Casinos	Real estate agents	Dealers in precious metals and stones	Lawyers	Notaries	Accountants & auditors	Trust and company service providers	Other DNFbps (add)	Total DNFbps	Other reporting entities (add)	Total other entities	Central bank	Customs and border control		Other gov. agencies (add)	Total gov. agencies
1.1 STRs Received by the FIU	1.1.1	No. of ML STRs received by the FIU																						
	1.1.2	Average value of ML STRs received by the FIU (in USD)																						
	1.1.3	No. of TF STRs received by the FIU																						
	1.1.4	Average value of TF STRs received by the FIU (in USD)																						
	1.1.5	Total no. of STRs received by the FIU																						
	1.1.6	Average value of all STRs received by the FIU (in USD)																						
1.2 CTRs	1.2.1	CTR requirement exists (Yes/No)																						
	1.2.2	CTR threshold ¹ (in USD)																						
	1.2.3	Total no. of CTRs received by the FIU																						
	1.2.4	Average value of CTRs received by the FIU (in USD)																						

Examples (FIU)

Data Year: 20__	Indicator	Categories of Reporting Entities and Agencies																				Total FIs, DNFbps, Other Entities, and Gov.		
		Financial Institutions (FIs)							DNFBPs							Other		Gov. Agencies						
		Banks	Non-bank deposit takers	Securities industry	Insurance industry	Money Services Businesses (MSBs)	Other financial institutions (add)	Total FIs	Casinos	Real estate agents	Dealers in precious metals and stones	Lawyers	Notaries	Accountants	Trust and company service providers	Other DNFbps (add)	Total DNFbps	Other reporting entities (add)	Total other entities	Central bank	Customs and border control		Other gov. agencies (add)	Total gov. agencies
1.4 STR Analysis and Dissemination	1.4.1	No. of ML STRs analysed ¹ by the FIU																						
	1.4.2	No. of ML STRs disseminated to / accessed by law enforcement agencies																						
	1.4.3	No. of ML STRs disseminated to / accessed by other government agencies																						
	1.4.4	No. of TF STRs analysed ¹ by the FIU																						
	1.4.5	No. of TF STRs disseminated to / accessed by law enforcement agencies																						
	1.4.6	No. of TF STRs disseminated to / accessed by other government agencies																						
	1.4.7	Total no. of STRs analysed ¹ by the FIU																						
	1.4.8	Total no. of STRs disseminated to / accessed by law enforcement agencies																						
	1.4.9	Total no. of STRs disseminated to / accessed by other government agencies																						

Examples (AML/CFT supervision)

- AML/CFT-specific staff, budget and training
- Inspections
- Sanctions and other measures

Examples (AML/CFT supervision)

Data Year: 20__	Indicator	Categories of Reporting Entities																Total FIs, DNFBPs, and Other Entities		
		Financial Institutions (FIs)							DNFBPs							Other				
		Banks	Non-bank deposit takers	Securities industry	Insurance industry	Money Services Businesses (MSBs)	Other financial i nstitutions (add)	Total FIs	Casinos	Real estate agents	Dealers in precious metals and stones	Lawyers	Notaries	Accountants & auditors	Trust and company service providers	Other DNFBPs (add)	Total DNFBPs		Other reporting entities (add)	Total other entities
4.1 Inspections	4.1.1	No. of regulated entities																		
	4.1.2	No. of supervisory notices and guidance documents on ML issues																		
	4.1.3	No. of supervisory notices and guidance documents on TF issues																		
	4.1.4	Total No. of supervisory notices and guidance documents on ML & TF issues																		
	4.1.5	No. of on-site inspections that covered ML & TF issues																		
	4.1.6	Total no. of inspections (incl. off-site) that covered ML & TF issues																		
	4.1.7	Total no. of inspections (incl. off-site) where ML & TF violations were identified																		
	4.1.8	Percent of total inspections where ML & TF violations were identified of the total no. of inspections																		
	4.1.9	No. of ML violations identified in inspections																		
	4.1.10	No. of TF violations identified in inspections																		
	4.1.11	Total no. of ML & TF violations identified in inspections																		

Q&A and Thanks

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