



## **CAPACITY DEVELOPMENT PROJECT ON ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM IN WEST AFRICA TRANSITION STATES (CD4AML/CFT)**

TERMS OF REFERENCE FOR THE RECRUITMENT OF INDIVIDUAL CONSULTANTS TO DEVELOP/REVIEW OPERATIONAL MANUALS FOR FINANCIAL INTELLIGENCE UNITS (FIUs) OF COMOROS, THE GAMBIA, GUINEA BISSAU AND LIBERIA

### **BACKGROUND**

1. The Intergovernmental Action Group against Money Laundering in West Africa (GIABA) is a specialized institution of the Economic Community for West African States (ECOWAS) established in 2000 to promote the implementation of Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) regime in the region.

2. In September 2022, GIABA signed a grant agreement with African Development Bank (AfDB) to implement a *Capacity Development Project on Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) in West Africa Transition States*. The project is aimed at contributing to building resilience in West Africa, through improved AML/CFT regimes and capacity development for GIABA and its member States, focusing on ten (10) transition countries<sup>1</sup>. The key objectives of the project are to: assist key transition countries in the effective and timely conduct and/or revision of their National Risk Assessments, including overcoming the challenges lack of data and ready statistics for risks assessment and strategic planning; assist key transition countries in the development of their National AML/CFT strategies, consistent with the risks identified in their NRAs; provide capacity building for relevant public sector officials and reporting entities, especially designated non-financial professions and businesses (DNFBPs); and development or

<sup>1</sup> Burkina Faso, Comoros, The Gambia, Guinea, Guinea Bissau, Liberia, Mali, Niger, Sierra Leone, and Togo  
*AfDB Project - Terms of Reference for the Development of Operational Manual for Financial Intelligence Units*

enhancement of AML/CFT tools and manuals that take into consideration regional peculiarities, including the fragility context of some countries and economic realities of the GIABA region

3. Broadly, the project will be implemented under three (3) components, namely: (i) support to GIABA member States in Transition, for the implementation of national AML/CFT strategies based on NRAs findings; (ii) capacity building for stakeholders from the public and from the private sector in AML/CFT emerging issues; and (iii) support to GIABA implementation capacities for project management.

4. A key activity under component two of the project is the development/review of Operational Manuals for Financial Intelligence Units (FIUs) in four of the beneficiary member States, namely the FIUs of **Comoros, the Gambia, Guinea Bissau and Liberia**.

## **PROJECT DESCRIPTION**

5. Financial Intelligence Units (FIUs) play key roles in the implementation of AML/CFT regime in member States. An FIU serves as a national centre for the **receipt** and **analysis** of: (a) suspicious transaction reports; and (b) other information relevant to money laundering, associated predicate offences and terrorist financing, and for the **dissemination** of the results of that analysis. A properly structured Operational Manual (OM) /Standard Operational Procedures (SOPs) would facilitate easy attainment of the objectives of FIUs.

6. The project intends to strengthen the operational efficiencies of the four (4) emerging FIUs in the ten (10) transition GIABA member States through the development of robust OM/SOPs that provides a comprehensive internal guidance for staff of the Units. The project will achieve this by taking a step-by-step approach in the operational process of the FIUs, including receipt of suspicious transaction reports (STRs), review of the quality of the STRs, allocation of STRs for analysis, production of financial intelligence and dissemination to end users. The project will enhance the understanding of the process of operational analysis and support the generation and dissemination of quality and consistent financial intelligence to relevant competent authorities to support national AML/CFT efforts.

7. The activity will support the development of a robust OM/SOPs for generating and disseminating financial intelligence. The OM/SOPs is a document that describes the regularly recurring operations to ensure that the operations are carried out correctly (**quality**) and always in the same manner (**consistency**).

8. Overall, the OM/SOPs will provide a clear internal guidance for staff and a systematic procedure for internal coordination for production and dissemination of financial intelligence. Ultimately, this would assist the Units to become more effective and efficient, especially in their analytical function.

## **OBJECTIVES OF THE CONSULTANCY**

9. The main objectives of this assignment are:

- to develop a comprehensive OM/SOPs that will facilitate the generation and dissemination of robust financial intelligence by either of the four (4) GIABA member FIUs (**Comoros, The Gambia, Guinea Bissau and Liberia**) to support end users operational needs. OM/SOPs will ensure that the FIUs operations are carried out effectively and in a consistent manner.
- to train FIU staff on the OM/SOPs

## SCOPE OF THE WORK

10. The individual Consultants will work under the supervision of the GIABA Principal Programme Officer, Financial Institutions and Non-Financial Entities (PPO-FINFES). The consultants will work closely with the beneficiary FIUs during the development of the OM/SOPs to ensure that each operational step or process is adequately covered. The consultants would review the existing OM/SOPs of the FIUs (if any) and conduct a gap analysis to identify the areas in the operational procedures of the FIUs that need to be strengthened and mainstreamed into the new OM/SOPs to ensure that the OM/SOPs produced are of international standard.

11. The scope of this assignment will include, among others, the tasks below:

- a) Conduct gap analysis - identify gaps in the current process and procedures for generating and disseminating financial intelligence and propose new ones to remedy the gaps. This should include methods for receipt of STRs, evaluation of the quality of STRs, procedures for assigning STRs for analysis, steps in the generation of financial intelligence and dissemination of financial intelligence to law enforcement agencies and other end users.
- b) Develop a robust systematic procedure (OM/SOPs) covering the procedures for receipt of STRs, evaluation of quality of STRs, allocation of STRs to analysts, analysis/generation, and dissemination of financial intelligence. This will also involve outlining a step-by-step process, including timelines, and identification of the analysts that should be involved in the various steps and the expected outputs. The consultants should work with expert staff from the beneficiary FIUs in developing the OM/SOPs. This will involve facilitating meetings to go through the OM/SOPs section-by-section and revising to reflect decisions made and procedures agreed.
- c) Identify and document training needs for FIU staff. The identified training needs should address the skills gaps as well as the skills required to implement the SOPs
- d) Finalize the OM/SOPs and mark their completion by the approval of the head of the beneficiary FIU.
- e) Conduct a 3-day Training of FIU staff, in particular, of the analysis unit, to ensure that the OM/SOPs are implemented smoothly.

## GUIDING PRINCIPLES FOR DEVELOPING THE OM/SOPs

12. The principles guiding the development of the OM/SOPs include:

- a) The OM/SOPs should prescribe set of steps to be followed routinely;
- b) The OM/SOPs should contain a written procedure of tasks that need to be undertaken at each stage;
- c) The OM/SOPs steps should provide operational staff a ready reference of what is expected in order to avoid the risk of missing key actions;
- d) The OM/SOPs should be written very simple to ensure anyone can follow the instructions so that procedures are completed in the same way and to the same standard every time;
- e) The OM/SOPs should capture the most efficient and effective ways to perform an operation; and
- f) The OM/SOPs should help in producing robust financial intelligence consistently.

## EXPECTED DELIVERABLES AND TIMELINES

13. Selected Consultants (**English -1 Consultant** for FIUs of The Gambia and Liberia<sup>2</sup>; **French – 1 Consultant** for the FIU of Comoros, and **Portuguese -1 Consultant** for the FIU of Guinea Bissau) will be expected to develop and deliver the OM/SOPs and other under-listed deliverables (in the FIU’s official language – English, French, or Portuguese) in hard (2 copies each) and soft copies within the indicative timelines in this ToR.

14. The consultants will give reports for each task upon completion of the task at prescribed times. The consultant will submit a draft OM/SOPs to the beneficiary FIU and GIABA in electronic format for review and comments. The consultant will submit the final OM/SOPs in electronic and printed versions to the beneficiary FIU and GIABA, together with report of the activity. In general, the expected deliverables will include among others, the following:

- **Deliverable 1: Inception report** - This report will outline plans and timelines with milestones for the development of the **OM/SOPs**. The submission of the report is about **six (6) working days** after signing the contract. The report will provide a comprehensive roadmap, milestones and timelines of this activity.
- **Deliverable 2: Gap analysis Report on existing OM/SOPs or operational procedures of the FIU** - This report will include an assessment or the description of all identified gaps in the current operational process and procedures (OM/SOPs) as

---

<sup>2</sup> The individual Consultant is expected to run the two projects in the two countries in parallel or where this presents practical challenges, one after the other. The advantages include reduction in the time and resources the Secretariat will devote to review, and standardization in the manual as experience from one country will be replicated in the other with modifications that take into consideration the peculiarities of the FIUs. This approach is likely to impact on delivery timelines for the 2<sup>nd</sup> FIU. The Secretariat will work closely with the expert or consultant to minimize the impact on timelines.

well as the proposed remedies. The report is expected about **ten (10) working days** after delivery of the Inception Report in 1.

- **Deliverable 3: Completion report** - This report will be a compilation of all the deliverables and tasks, including the consultation with GIABA and beneficiary FIU staff, completed during the assignment and should be accompanied by the final OM/SOPs. The report is expected about **thirty (30) working days** after delivery of the gap analysis report in 2.
- **Deliverable 4: Report on sensitisation of staff on SOPs** - This report will cover the outcomes of training and sensitisation of the relevant FIU staff on the OM/SOPs implementation and should highlight or identify further training needs that staff may require to ensure smooth implementation of the OM/SOPs. This report is expected six (6) working days after conclusion of training programme.

## INDICATIVE TIMELINES

Activity	Start Date	End Date	Submission of Report	Total No of Working Days
Inception Report	Oct 7	Oct 11	Oct 14	6
Gap analysis Report	Oct 15	Oct 28	Oct 28	10
Development of OM/SOPs & Completion report	Oct 29	Dec 9	Dec 9	30
Training / Report on sensitisation of staff on SOPs	Dec 10	Dec 12	Dec 17	6
<b>Total number of working days</b>				<b>52</b>

## INSTITUTIONAL ARRANGEMENT

15. The Consultants will work under the supervision of the of the GIABA PPO – FINFEs. He will be directly responsible for collaborating with the consultant on the activity, including providing comments on the draft SOPs. The consultants will provide progress reports as outlined above. While implementing the assignment, the Consultants will interact / engage with relevant staff of the beneficiary FIU to understand their expectations and ensure that the expectations are taken into consideration.

## DURATION OF THE ASSIGNMENT

16. The expected duration of this assignment is fifty-two (52) working days and shall commence at contract signing or no more than one week. The target date for the start of work is 7<sup>th</sup> October 2024 and expected completion date is 17<sup>th</sup> December 2024.

17. The assignment will be largely desk review with a five (5) working day onsite visit during the drafting of the OM/SOPs and three (3) working days staff training after adoption of the OM/SOPs. Where necessary, there should be periodic virtual meeting with relevant staff of the beneficiary FIU during the assignment.

## **QUALIFICATIONS OF THE SUCCESSFUL CONSULTANTS**

18. Consultants with proven experience in the operations of FIUs will carry out this assignment. The consultant should have excellent technical writing skills and in-depth knowledge and experience in operational/strategic analysis of FIUs.

19. The ideal consultant for this assignment should meet the following minimum requirements:

- a) Demonstrate deep knowledge and understanding of FIU's operations, process and procedures;
- a) At least 10 years of practical experience in an FIU or FIU's operation, especially in analysis (financial intelligence generation and dissemination), 3 of which should be at management level.
- b) Have analytical and report writing skills.
- c) Experience in the development of OM/SOPs for FIUs / related organizations is desirable; and
- d) Experience in FIU's mentorship or assessment of FATF Immediate Outcome 6 is an added advantage.
- e) Experience in developing OM/ SOPs for FIUs or related organizations.
- f) Knowledge of ICT/ basic FIU analytical tools is desirable.
- g) AML/CFT certifications such as ACAMS is an advantage
- h) Experience working in Africa is an advantage

### **Education**

20. The consultant must have a minimum of a master's degree in economics, finance, business administration, anti-money laundering or other relevant field (s) from a duly recognized university.

## Competencies

- Proficient in written and oral English, French or Portuguese, with analytic capacity, and strong report writing /drafting skills; and
- Well-grounded in the process and procedures of FIU's operations.

## CRITERIA FOR SELECTION OF CONSULTANT

Selection Criteria		Score Weight	Max Points Obtainable	Consultant				
				A	B	C	D	E
1.	10 years working experience in an FIU, including knowledge and understanding of FIU's operations, process and procedures	35%	35					
2	3 years' experience at management level within an FIU	10%	10					
3.	Experience in developing Operational Manuals/ SOPs	30%	30					
4	Knowledge of basic FIU analytical tools	3%	3					
5.	Previous experience in FIU's mentorship or assessment of FATF Immediate Outcome 6	7%	7					
6	Experience working in Africa region	2%	2					
7	AML/CFT / relevant Professional certifications	2%	2					
8	Academic qualification	10%	10					
9	Language competencies	1%	1					
<b>Total</b>			<b>100</b>					

### GIABA SECRETARIAT

Intergovernmental Action Group against Money Laundering in West Africa  
 Complexe SICAP, Point E, 1er Etage, Immeuble A, Av Cheikh Anta Diop x Canal IV, BP 32400  
 Dakar, Senegal

Tel: +221 33 859 1818 Ext 838. Fax : +221 33 824 17 45