

**DOWNTONHILL**

NEXT-GENERATION FINANCIAL CRIME PREVENTION TRAINING™

SPECIAL SESSION ON  
CORPORATE GOVERNANCE

# COMPLIANCE FOR ACCOUNTABLE INSTITUTIONS

*“Building capacity in response to the establishment of Ghana’s  
Financial Intelligence Centre and AML legislation”*

**3-DAY ADVANCED INTERACTIVE TRAINING SEMINAR & FORUM  
FOR ACCOUNTABLE INSTITUTIONS & REGULATORY AUTHORITIES**

Labadi Beach Hotel  
Accra  
22<sup>nd</sup>-24<sup>th</sup> March 2010



With the support of the West African Bankers' Association - WABA

[www.downtonhill.com](http://www.downtonhill.com)

## THE SEMINAR & FORUM

### Objectives:

- to address roles, responsibilities and expectations of key stakeholders in respect of the establishment of Ghana's new Financial Intelligence Centre
- to enable understanding of critical aspects of an effective, functioning financial intelligence unit
- to unpack Ghana's AML legislation in the light of the establishment of the Financial Intelligence Centre, of international compliance standards, and recent developments in the global economy
- to examine experience gained in other jurisdictions, to facilitate a sound understanding of how best to address the unfolding challenges
- to provide a template for best practice for organisations in West Africa

### Public-private sector co-operation

The seminar will stress the importance of public-private sector co-operation and understanding, and will serve as a valuable forum for the exchange of ideas and experiences between the regulatory institutions and the organisations accountable to them.

### We invite:

- Banks
- Financial institutions
- Public-sector agencies

to attend this seminar.

The seminar will build upon our recent programme in Accra, in October 2009, to develop and advance the skills and understanding of participants from institutions in Ghana and across the region.

Comprehensive pre-read materials will be provided before the seminar, and there will be a refresher session on the first day.

Participants will receive all programme materials and supplementary information on a flash drive, and a certificate of attendance.

## DAY ONE

### REVIEW OF MAJOR TOPICAL ISSUES

- Terminology
- International standards
- Local legislation & regulation
- Sanctions & penalties

### ROLES OF STAKEHOLDERS IN THE AML/CFT ENVIRONMENT

- Who are the stakeholders in the AML/CFT environment
- What is the role played by stakeholders in the AML/CFT environment
- International perspective
- Local perspective

### Activity – The role of stakeholders in the AML/CFT environment

### SPECIAL SESSION: CORPORATE GOVERNANCE & SUSTAINABILITY

- Corporate governance principles
- King III Report on good corporate governance
- Sustainability reporting
- AML/CFT management

### EFFECTIVE COMPLIANCE FRAMEWORK

- CDD/KYC including enhanced client intake issues & advanced KYC
- Record keeping
- Reporting
- Training

### Activity – KYC & record keeping

### ROLES, RESPONSIBILITIES & ACCOUNTABILITY OF MANAGEMENT & OPERATIONAL STAFF

- Board of Directors
- Senior management
- Head of Compliance
- Compliance manager
- MLRO
- Local manager
- Front-line employee

### Activity – Determination of responsibilities

### CORE PRINCIPLES OF THE COMPLIANCE FUNCTION

- Compliance policy, charter & framework
- Establishment of a compliance function
- Status
- Independence
- Fit & proper
- Resources
- Appointment & termination
- Culture & behaviour
- Independent review
- Materiality

### Activity – Core principles

## DAY TWO

### ROLE & EXPECTATIONS OF THE FINANCIAL INTELLIGENCE CENTRE (FIU)

- International best practice
- Functions of the FIU
- FIU partners
- Proactive vs. reactive
- Feedback

### SUSPICIOUS TRANSACTION REPORTING

- Types of reports
  - Indicators
  - Suspicious vs. unusual
  - Non-reporting
- ### Activity – Suspicious Transaction Reports

### AML/CFT LEGAL OBLIGATIONS

- Legal requirements around STRs
- Legal obligations
- Penalties for not meeting requirements

### ROLE OF ACCOUNTABLE INSTITUTIONS

- International requirements
- Local requirements
- Compliance with spirit of legislation

### ROLE OF SUPERVISORS & REGULATORS IN THE AML/CFT ENVIRONMENT

- International guidance
- Understanding the environment
- Risk-based approach
- Testing for adequacy

### Activity – Role of supervisors

### ROLE OF LAW ENFORCEMENT AGENCIES IN THE AML/CFT ENVIRONMENT

- Using FIU information
- Investigating ML
- Proactive gathering of ML information
- Trends & typologies
- Feedback

### KEEPING UP TO DATE

- ML trends & typologies
- New developments
- Tools & information
- Trade-Based Money Laundering
- Corruption

## DAY THREE

### COMPLIANCE OFFICER PROFILE

- Occupational purpose
- 6 tasks of a compliance officer
- Compliance knowledge skills & experience

Activity – Compliance occupational profile

### CONTROL ENVIRONMENT

- Control framework
- ML control
- AML/CFT assurance

Activity – Controls

### COMPLIANCE RESPONSES TO REGULATORY REQUIREMENTS

- Compliance with AML/CFT requirements
- Conservative & liberal compliance
- Achieving compliance objectives

### RELATIONSHIP OF COMPLIANCE, INTERNAL AUDIT & LEGAL DEPARTMENTS

- Compliance responsibilities of these departments
- Relationship of compliance function with operational risk management functions, other operating units & subsidiaries

Activity – Compliance responsibilities

### COMPLIANCE PROGRAMME

- Role of programme in execution of responsibilities of compliance function
- Risk-based approach in programme formulation
- Programme implementation, optimisation & review
- Programme coverage & co-ordination across risk management functions

Activity – Risk assessment

### REVIEW & INSPECTION OF ACCOUNTABLE INSTITUTIONS

- Preparation for a review/inspection
- Engagement with stakeholders
- Review/inspection process
- Testing: adequacy & effectiveness
- Management of review findings

Activity – Review & inspection of accountable institutions

## FACULTY

### John Symington

Compliance expert - former Group Head of Compliance, Standard Bank, South Africa

Currently participating in the drafting of the King III Report Guidance Notes on Good Corporate Governance

### Ursula M'Crystal

Anti-money laundering specialist - former senior officer at the Financial Intelligence Centre, South Africa

FIU and Law Enforcement AML specialist

John and Ursula are leading authorities on AML/CFT and Compliance Management, combining wide knowledge of international best practice with extensive first-hand experience of working in the area of AML/CFT.

## PRESENTATION

The interactive programme is presented at an advanced level, using presentations, selected case studies and activities.

All topics in the programme relate to specific key challenges, taking account of global, regional and national legislation and practices.

Downton Hill has conducted open-access Compliance and AML/CFT seminars extensively in West African countries, including Ghana, Senegal and Nigeria, and in-house training for a number of major West African banks.

## VENUE



Set amidst tropical landscaped gardens adjacent to one of Ghana's most popular beaches in the country's administrative, communications and economic centre in Accra, the 5-star Labadi Beach Hotel caters to the business traveller.



The hotel has earned itself the reputation of being the most sought-after business venue in Ghana.



Please contact Downton Hill on +44 (0)1588 640089 for assistance with reservations at the hotel at preferential seminar rates.

## SEMINAR REGISTRATION FORM

### PARTICIPANT DETAILS

Please insert details as they should appear on name-badge.

PLEASE USE BLOCK CAPITALS

Full name:  
Position:  
Email:

Full name:  
Position:  
Email:

Full name:  
Position:  
Email:

Full name:  
Position:  
Email:

Full name:  
Position:  
Email:

Full name:  
Position:  
Email:

Organisation:

Address:

Contact person:

Telephone:

Fax:

Email:

Signed:

### PAYMENT

Please invoice my organisation for the sum of:

Invoice and bank transfer details will be forwarded on receipt of registration.

## SEMINAR INFORMATION

### COMPLIANCE FOR ACCOUNTABLE INSTITUTIONS

ORGANISED BY:  
**DOWNTON HILL**

VENUE:  
**LABADI BEACH HOTEL  
ACCRA, GHANA**

DATES:  
**22nd-24th MARCH 2010**

SEMINAR FEE:  
**GBP£1,495:00**

This includes all tuition, pre-read materials, seminar materials, morning coffee, lunch & afternoon tea.

### MULTIPLE BOOKING DISCOUNT

There is a discount of 10% of seminar fees for organisations sending two or more participants.

#### PLEASE NOTE:

We offer an additional  
**10% DISCOUNT**  
for registration and payment  
received by  
**29th January 2010**

This seminar is non-residential. Participants will be responsible for their accommodation. Downton Hill will not be responsible for any travel or incidental expenses incurred by participants.

### REGISTRATION

To register, please complete and email this form to:

[contact@downtonhill.com](mailto:contact@downtonhill.com)

or tel/fax to +44 (0)1588 640089

### CANCELLATION

We do not charge any cancellation fees. In the event that you register and pay, and cannot attend for any reason, we will make a full refund. We would, of course, welcome the participation of a colleague in your place.

Downton Hill  
Rural Enterprise Centre  
Stafford Drive  
Battlefield Enterprise Park  
Shrewsbury  
SY1 3FE  
United Kingdom

Tel/fax: +44 (0)1588 640089  
Email: [contact@downtonhill.com](mailto:contact@downtonhill.com)