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EUROPEAN UNION AGENCY FOR
LAW ENFORCEMENT TRAINING

Operational Training Needs Analysis

Criminal finances, money laundering, and asset recovery

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OPERATIONAL TRAINING NEEDS ANALYSIS – CRIMINAL FINANCES, MONEY LAUNDERING AND ASSET RECOVERY (2024)

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The assistance of those who contributed to this document is hereby acknowledged with gratitude.

More information on the European Union is available on the internet (http://europa.eu).

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List of abbreviations

AI	Artificial Intelligence
ALEFA	Association of Law Enforcement Forensic Accountants
AMON	Anti-Money Laundering Operational Network
ARO	Asset Recovery Office
AT	Austria
BG	Bulgaria
CARIN	Camden Asset Recovery Inter-Agency Network
CEPOL	European Union Agency for Law Enforcement Training
CKC	CEPOL Knowledge Centre
CNU	CEPOL National Unit
CY	Cyprus
CZ	Czech Republic
DE	Germany
DG JUST	Directorate-General for Justice and Consumers
EC	European Commission
EE	Estonia
EJTN	European Judicial Training Network
EL	Greece
EMPACT	European Multidisciplinary Platform Against Criminal Threats
EPPO	European Public Prosecutor's Office
ES	Spain
EU	European Union
EUROPOL	European Union Agency for Law Enforcement Cooperation
EU-STNA	European Union Strategic Training Needs Assessment
FI	Finland
FIU	Financial Intelligence Unit
FR	France
HU	Hungary
IE	Ireland
INTERPOL	International Criminal Police Organization
ISF	Internal Security Fund
IT	Italy
JHA	Justice and Home Affairs
JIT	Joint Investigation Team
LE	Law Enforcement
LT	Lithuania
LU	Luxembourg
LV	Latvia
MB	Management Board
MS	Member State/s
MT	Malta
NL	The Netherlands
OTNA	Operational Training Need Analysis
OSINT	Open-Source Intelligence
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

Executive summary

Criminal finances, together with money laundering and asset recovery, are central to many forms of organised crime. In recognition of this, the priorities of the European Multidisciplinary Platform Against Criminal Threats (EMPACT)[1] on fraud, and economic and financial crimes put emphasis on the need for coordinated efforts to address these issues. The European Union Strategic Training Needs Assessment (EU-STNA)[2] 2022-2025 also identified criminal finances, money laundering, and asset recovery as **the second most urgent training priority for law enforcement (LE) professionals**. To assess the most pressing LE training needs across the EU, the European Union Agency for Law Enforcement Training (CEPOL)[3] launched an Operational Training Needs Analysis (OTNA) on the topics of criminal finances, money laundering, and asset recovery in September 2023.

24 countries contributed   **92 % response rate**   **3 748 professionals represented**   **7 relevant topics identified**

The OTNA gathered **insights from 24 European Union (EU) Member States[4] (MS)[5], and EU institutions**, representing **3 748 European LE professionals**.

7 topics

The process revealed **seven topics** that are the most relevant for EU-level training. **Four key topics** emerged as particularly important: **financial analysis methods, financial investigations and asset tracking, emerging crime patterns, and modern technologies.** These highest-ranked topics underscore the growing sophistication of criminal activity, as it extends to the use of crypto assets, non-tangible tokens, and underground banking systems. Modern technologies, such as artificial intelligence (AI) and open-source intelligence (OSINT), are continuously becoming more

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[1] https://www.europol.europa.eu/crime-areas-and-statistics/empact
[2] https://www.cepol.europa.eu/publications/european-union-strategic-training-needs-assessment-2022-2025 pp. 31-34.
[3] Mid-term review of the EU-STNA 2022-2025, Nov 2023, https://www.cepol.europa.eu/documents/mid-term-review-eu-stna-2022-2025 pp. 15-18.
[4] Austria, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.
[5] Hereinafter, 'Member States' refers to the 26 Member States of the European Union participating in the CEPOL Regulation, i.e. all the EU Member States except Denmark.

central to investigations, forcing a shift towards more tech-driven LE approaches. Additionally, the Asset Recovery Offices (ARO) play a central role in tracking and confiscating both physical and virtual assets, especially for specialised financial investigators. Cross-border cooperation, particularly with customs authorities and international networks, was highlighted as essential for effectively combatting these crimes. Finally, while just crossing the relevance threshold, the topic of investigating crime enablers, such as financial service providers and real estate agents who knowingly facilitate illegal financial flows, was identified as a core training priority.

Financial analysis methods including crypto assets and financial forensics
88%

Financial investigations and asset tracking, tracing and recovery for investigators of other crime areas
83%

Modus operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)
83%

Use of modern technologies, including Artificial intelligence, open-source intelligence and big data analysis
83%

Role of Asset Recovery Offices in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators
63%

Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries
58%

Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows
50%

Cooperation of the police, tax and customs agencies with the Financial Intelligence Units and the banking sector in investigation, prevention and control mechanisms
42%

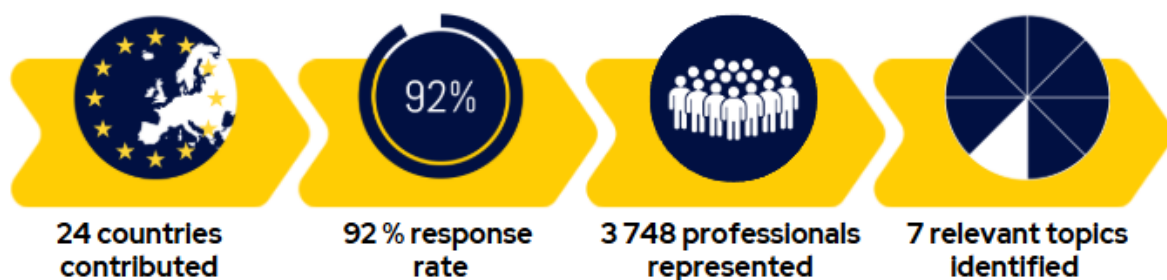While the relevance of these topics is clear, the **urgency[6] of addressing them through training was rated as moderate.** This suggests that while training within the next year would be beneficial, immediate and transformative performance improvements generated through immediate training are less likely. Bearing this in mind, a strategic training approach could be considered, for example, in order to prioritise the most relevant topics first to ensure a focused and practical training rollout.

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[6] See Annex 2 for the official definitions of urgency levels.

| Moderate urgency | Up to 153 049 participants | 46% judicial profiles | Practitioner and awareness level |
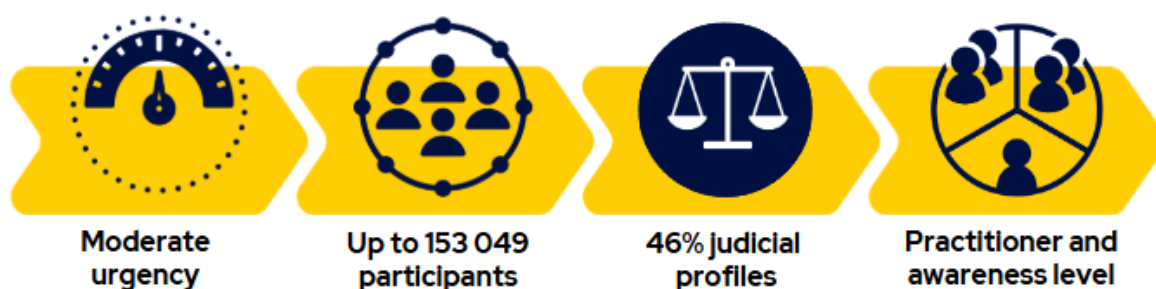
The OTNA results identified a need for targeted training on **18 key subtopics**[7] relating to the evolving complexities of criminal finances, money laundering, and asset recovery**.**

18 Subtopics

In terms of contents, the training should prioritise **financial analysis methods**, and focus particularly on **crypto assets** and **financial forensics**, given their increasing role in modern money-laundering schemes. Law enforcement professionals have to develop skills in **tracking, tracing, and analysing these complex financial instruments** and apply **financial investigation techniques** for **asset tracking and recovery** across various crime areas. **Specialised training** is seen as necessary for dealing with the **evolving modi operandi** of criminal organisations, by particularly focusing on **emerging crime patterns**, such as **non-tangible tokens**, **underground banking systems**, **trade-based money laundering**, and **new modes of terrorist financing**. The integration of **modern technologies** such as **AI**, **OSINT**, and **big data analysis** should be a key component of training, to ensure that law enforcement professionals can leverage these tools to enhance their investigative capabilities, to be able especially to process large datasets and identify financial crime patterns. The training should focus on the role of **AROs** in **tracking, tracing, freezing, and confiscating both physical and virtual assets**, particularly for specialised financial investigators. Topics such as the **systematic launch of financial investigations** and **pre-seizure planning** should be covered to ensure effective asset recovery. Under the topic of **international cooperation**, the training should focus on collaborating with **customs authorities**, **EU agencies**, and **international networks**, with an emphasis on using platforms such as the **ARO platform, Camden Assets Recovery Inter-Agency Network (CARIN),** and the **Anti-Money Laundering Operational Network (AMON)** to facilitate successful cross-border investigations. Finally, it is essential to include training on **investigating crime enablers**, such as **lawyers, financial service providers, and real estate agents** who knowingly facilitate illegal financial flows, which is crucial for dismantling the networks that support criminal operations.

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[7] The OTNA respondents ranked subtopics by preference without assigning direct relevancy ratings. Following the OTNA methodology, where countries provide multiple responses, the highest ranking was selected. To align with standard OTNA report formats, these rankings were converted into percentages. A limitation of this approach, particularly for main topics with only two subtopics, is that one subtopic may appear as disproportionately more relevant than another when rankings are converted into percentages.

Furthermore, the OTNA identified **three critical horizontal aspects** that should be **integrated into all training in a cross-cutting manner** to ensure a comprehensive and forward-looking approach, to equip LE professionals with the skills to tackle evolving criminal challenges:

High-risk criminal networks – Recognised as the top priority, training should address the complex and transnational nature of organised crime, which requires a coordinated and multifaceted response. **82%**

Lawful access to data – Given the increasing reliance on technology by criminal organisations, equipping law enforcement with the tools and knowledge to access digital evidence in a legal and effective manner is seen as relevant for all training areas. **60%**

Crime prevention – Embedding prevention strategies throughout training is considered relevant to support law enforcement in adopting a proactive approach, focusing on disrupting criminal activities before they escalate. **53%**

Countries contributing to the OTNA reported an immediate need for training for **26 091[8] professionals**, which represents a significant demand across the EU. Based on the OTNA, the estimated number of LE professionals across the Union requiring training on topics related to criminal finances during 2025-2027 is **153 049 individuals**.

Judiciary & Investigators

>150 000

Nearly half of the identified training needs were for **prosecutors, investigative judges, and magistrates**[9], and this was followed by an identified training need for **experts** and **intelligence officials**, though to a lesser extent. While this distribution remains consistent across most of the priority areas, in the direct contributions from the responding countries, **investigators represented the largest group** in need of training over those with judicial profiles. This suggests that despite the statistical analysis projecting a higher need for judicial roles at the EU level, the detailed OTNA results should be carefully examined **to ensure that investigators** - who play a critical role in the operational aspects of investigating criminal finances - **receive the necessary attention in the form of tailored training**.

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[8] The number was lower for the relevant topics: 23 196.

[9] The high number of trainees from three respondent countries (Latvia, Italy and Poland) and the median calculation of the OTNA method distort the number of trainees for some topics and need to be taken in context.
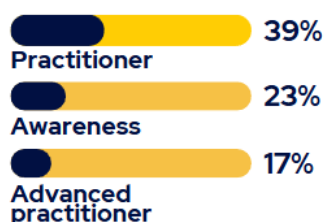
The findings indicate that over **one-third (39%) of the total training demand is for practitioner-level professionals**, reflecting the significant need for hands-on expertise in the field. The training demand for **awareness-level training followed** at 23%, for **advanced practitioners** 17%, Train-the-Trainer professionals 11%, and for experts 10%. This distribution highlights the need for training for specialised roles.

Overall, the OTNA results highlight the central need for timely and targeted training programmes to equip LE professionals across the EU with the necessary skills to tackle complex criminal financial operations. With significant demand for training - especially for practitioners at various proficiency levels - and an emphasis on the judiciary sector and investigative roles, tailored training approaches are essential to address these pressing needs.

In **Graphic 1** below, there is a visual summary of the main findings of this OTNA. Using the Eisenhower Matrix, the analysis shows the levels of relevance and urgency of the training topics, along with the estimated number[10] of potential trainees at the EU level[11].

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[10] Bubble sizes representing these numbers; a larger bubble indicates a higher number of trainees, while a smaller bubble represents fewer trainees.

[11] The OTNA methodology is aimed at identifying the number of potential trainees at the EU level, calculated using the statistical median extrapolated across all countries covered by the CEPOL Regulation 2015/2219.

Graphic 1 - Eisenhower analysis - relevancy, urgency and estimated number of trainees - for all main topics

Eisenhower analysis

- Cooperation of the police, tax and customs agencies with the Financial Intelligence Units and the banking sector in investigation, prevention and control…
- Financial investigation and asset tracking, tracing and…
- Role of AROs in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial…
- Financial analysis methods including crypto assets and financial forensics
- Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows
- Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of…
- Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries
- Use of modern technologies, including AI, OSINT and big data analysis

Urgency (y-axis): 0–100

Relevance (x-axis): 0–100

CEPOL's current training portfolio on criminal finances, money laundering and asset recovery covers the needs identified in this Report. To cater for the increasing demand to address horizontal aspects, the OTNA Expert Group suggested adding the topics - high-risk criminal networks, lawful access to data and crime prevention - to the criminal finances training portfolio in the form of webinars or other online products as pre-assignment tasks to onsite activities. Although the respondents did not address the increased need for training on the administrative approach[12] under horizontal aspects, the OTNA Expert Group agreed to put more emphasis on this area in the 2025-2027 training portfolio, especially at awareness level. Furthermore, the training should reflect the fact that the open financial markets of the EU combined with rapid technological developments make following the money more challenging. Accordingly, the awareness of law enforcement officials should be raised through training to ensure that this risk is recognised.

Introduction

As defined under Article 3 of Regulation 2015/2219[13] (the CEPOL Regulation), CEPOL's objectives are to support, develop, implement, and coordinate training for LE officials, with a particular emphasis on the protection of human rights and fundamental freedoms. The agency plays a crucial role in facilitating the prevention and fight against serious and organised crime, terrorism, and emerging security threats by enhancing cross-border cooperation through vocational training. Through its training, CEPOL supports LE efforts and activities in maintaining public order, international policing of major events, and planning and commanding EU missions.

To ensure its training programmes address the most urgent and relevant needs, CEPOL relies on the OTNA process, which is conducted regularly in alignment with the priority topics defined by the EU-STNA. The OTNA methodology was first piloted in 2018[14] and officially adopted by CEPOL's Management Board (MB) in its Decision 32/2017/MB. It was subsequently updated in 2020 to reflect feedback from the MS and evolving training requirements. This approach, as outlined in CEPOL's Single Programming Document (SPD) 2024-2026[15], ensures that CEPOL's training activities are aligned with the operational needs of the EU MS. The OTNA is a structured seven-step process[16] and includes cooperation with

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[12] 'An administrative approach to serious and organised crime is a complementary way to prevent and tackle the misuse of the legal infrastructure through multi-agency cooperation by sharing information and taking actions in order to set up barriers', available on: Definition - enaa

[13] Available on: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R2219&from=EN

[14] Since then, CEPOL has conducted multiple OTNAs each year on the different topics defined in the EU-STNA, which have been complemented as needed by extraordinary needs assessments, done using the OTNA methodology.

[15] https://www.cepol.europa.eu/about/key-documents?pg=1, Annex to Management Board Decision 17/2022/MB, CEPOL Single Programming Document for 2024-2026, (13 December 2022), p. 5.

[16] The overall OTNA process entails data collection and analysis, which is conducted via and corroborated by introductory surveys, detailed questionnaires, and expert interviews. The target group referred to in this methodology is LE officials, as defined in Article 2 of Regulation 2015/2219.

CEPOL National Units (CNU), CEPOL Knowledge Centres (CKC), and various LE bodies. The target group comprises LE officials, as defined in Article 2 of the CEPOL Regulation[17].

Criminal finances and money laundering are recognised as critical areas for law enforcement training within the EU. EMPACT prioritises Fraud, Economic, and Financial Crimes as key focus areas, stressing the need for comprehensive action against criminal finances. The EU-STNA 2022-2025 reinforced this by ranking criminal finances, money laundering, and asset recovery as the second-highest strategic training priority. Furthermore, for example, the EU's Anti-Money Laundering and Countering the Financing of Terrorism framework[18] calls for systematic training for LE professionals to address emerging challenges such as the misuse of cryptocurrencies, non-tangible tokens, and underground banking systems.

Recognising these priorities, CEPOL launched the OTNA on criminal finances, money laundering, and asset recovery in September 2023, with the aim of assessing the most pressing training needs in these areas and to shape CEPOL's future training portfolio to better respond to the needs of LE professionals to combat these complex criminal activities.

The OTNA focused on eight main topics that represent the key aspects of tackling criminal finances, money laundering, and asset recovery, encompassing both the traditional and emerging elements of criminal finances and asset recovery:

- Financial analysis methods including crypto assets and financial forensics
- Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas
- Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)
- Use of modern technologies, including AI, OSINT and big data analysis
- Role of AROs in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators
- Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries
- Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows
- Cooperation of the police, tax and customs agencies with the Financial Intelligence Units (FIUs) and the banking sector in investigation, prevention and control mechanisms

The OTNA survey, conducted between December 2023 and January 2024, invited 26 EU MS and relevant EU institutions to share their views on training needs related to criminal finances, money laundering, and asset recovery.

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[17] [Regulation (EU) 2015/2219](#) of the European Parliament and of the Council of 25 November 2015 on the European Union Agency for Law Enforcement Training (CEPOL) and replacing and repealing Council Decision 2005/681/JHA - Publications Office of the EU (europa.eu).
[18] Available on: https://finance.ec.europa.eu/financial-crime/anti-money-laundering-and-countering-financing-terrorism-eu-level_en

In total, 24[19] MS contributed to the survey and provided 41 individual responses from various LE bodies, representing 3 748 LE professionals across the Union. These responses were later complemented by two expert interviews[20] conducted as part of the OTNA process in February 2024. **Graphic 2** below presents an overview of the responding countries, with the contributing MS highlighted in dark blue on the map.

Graphic 2 - Responding countries[21]

OTNA survey participants

Austria, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, The Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

Most of the responses came from the police, followed by other relevant bodies[22], border police or border guards[23], and customs authorities. The distribution of the responses by sector is presented in **Graphic 3** below.

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[19] Austria, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

[20] Two police officials from Greece and from Portugal were interviewed.

[21] Created with mapchart.net

[22] Other relevant bodies were: Crime proceedings at the Custom-Fiscal Office (PL); Portuguese Tax and Customs Authority (PT); Subcarpathian Customs and Tax Control Office (PL); the Statutory law enforcement institution accountable to the President and Parliament of the Republic of Lithuania that detects and investigates corruption offences and develops and implements corruption prevention measures (LT); AFCOS Romania; and the Gendarmerie (FR).

[23] One respondent clarified: 'The Border Guard does not conduct cases directly related to criminal finances, money laundering and asset recovery. However, in cases related to migration and economic crime, we undertake activities related to asset recovery and money laundering'.

Graphic 3 - Sectors represented by the respondents
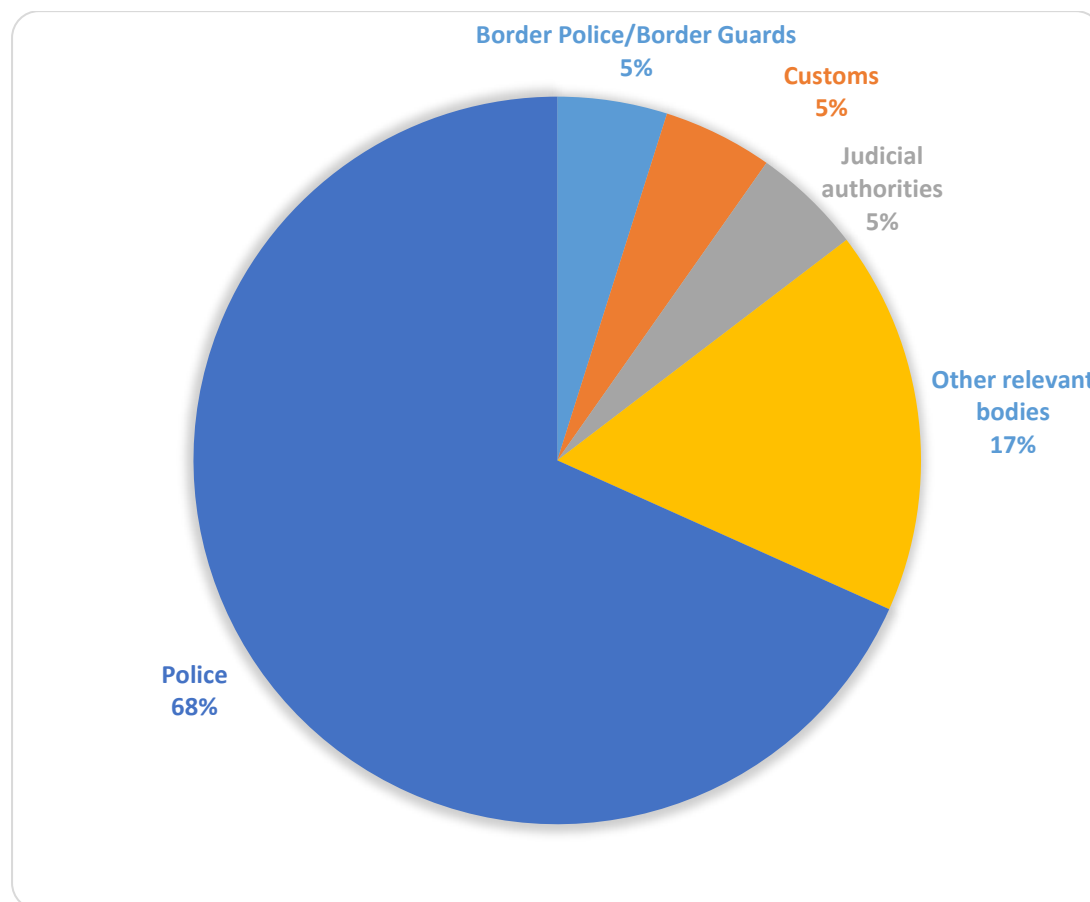
This report presents the outcomes of the OTNA on criminal finances, money laundering, and asset recovery, which will shape CEPOL's future training portfolio on these critical topics. The report is divided into six parts. The Executive summary provides an overview of the key findings and primary training needs identified through the OTNA. The Introduction outlines the methodological framework and describes the respondent pool. The Analysis is the core of the report, and details the training needs for the seven most relevant topics identified by more than 50% of the responding MS. In Topics and subtopics of the training, each main topic is presented in-depth, along with the identified subtopics to be prioritised in the training. This is followed by Feedback from the Expert Group Meeting on the OTNA findings. Finally, in the Conclusions section, there is a summary of the OTNA findings and recommendations for future training development.

Analysis

The OTNA survey for criminal finances, money laundering, and asset recovery included multiple-choice questions, allowing respondents to select one or more options from a list of eight relevant topics. The relevancy rating for each topic was calculated by aggregating the number of MS that identified the topics as relevant. The final relevancy rating was determined by dividing the total number of MS considering a topic relevant by the total number of responding MS. Where multiple LE bodies from the same MS responded, the data were consolidated to reflect a single national perspective. In line with the OTNA methodology, any topic deemed relevant by more than 50% of responding MS was deemed a priority and included in the subsequent analysis.

Relevancy of topics and subtopics

Based on this approach, seven of the eight main topics exceeded the relevancy threshold of 50% and are analysed in detail in this report. The highest-ranked topic was Financial analysis methods including crypto assets and financial forensics, with 88% of respondents deeming it relevant. Following closely behind, several topics received similarly high relevancy ratings, such as Financial investigations and asset tracking, tracing, and recovery (83%); Modi operandi related to emerging crime patterns, such as non-tangible tokens, new modes of terrorist financing, and underground banking (83%); and the Use of modern technologies, including AI, OSINT, and big data analysis (83%). One topic was below the relevancy threshold and was considered therefore as less critical for training in the immediate future.

Table 1 below recaps the relevancy ratings for the various topics, with those scoring above the 50% relevancy threshold highlighted in bold.

Table 1 - Rating of the main topics based on their level of relevancy

Main topic	Relevancy
Financial analysis methods including crypto assets and financial forensics	**88%**
Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas	**83%**
Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)	**83%**
Use of modern technologies, including AI, OSINT, and big data analysis	**83%**
Role of AROs in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators	**63%**
Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third (non-EU) countries	**58%**
Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows	**50%**
Cooperation of the police, tax, and customs agencies with the FIUs and the banking sector in investigation, prevention and control mechanisms	42%

Of the eight main topics, six included subtopics, and respondents were asked to rate[24] the relevancy of these subtopics to their work. The analysis of these ratings, presented in **Table 2**, indicates the specific training needs of European LE staff. These training needs are closely linked to the main training topics, and some additional cross-cutting themes were identified.

Table 2 - Relevancy rating of subtopics - under all the main topics

Main topic	Subtopic	Relevancy
Financial investigations and asset tracking, tracing and recovery for investigators of other crime areas	**Technical priorities and aspects of investigations**	**58%**
	Big data analysis	**53%**
	OSINT	38%
	Possibilities of AI in financial investigations	38%
Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)	**Money laundering via virtual currencies, and complex financial schemes**	**65%**
	International money laundering bolstered by trade-based money laundering (e.g. fictitious contracts and invoices)	**54%**
	Corporate economic crime and fraud schemes (subsidy fraud, bank fraud, investment fraud, Chief Executive Officer (CEO) fraud and social benefit fraud)	**53%**
	Money laundering via normal financial system (electronic)	48%
	Money laundering as crime-as-a-service, illegal sale of unlicensed financial services	46%
	Offshore challenges related to concealing beneficial ownership	44%
	Cash-collection networks	44%
	Links to corruption	38%
	Underground banking systems including informal value transfer systems (e.g. Hawala)	31%
	Money laundering via high value goods, especially cultural goods and services	26%
Use of modern technologies, including AI, OSINT and big data analysis	**Possibilities of AI in financial investigations**	**53%**
	Big data analysis	49%
	Technical priorities and aspects of investigations	44%
	OSINT	36%
Role of AROs in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators	**Systematic launch of financial investigations**	**78%**
	Role of AROs	**75%**
	Pre-seizure planning	**50%**
	Importance of interlocutory sales	25%
	Sanctions evasions in relation to money laundering and asset recovery	22%
Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new	**Role of EU agencies**	**68%**
	ARO platform	**67%**
	Cooperation with Interpol	**59%**

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[24] This survey used a pre-defined rating method instead of the Likert scale. The subtopics should have been rated according to the respondents' preferred order.

Main topic	Subtopic	Relevancy
instruments, cooperation with third countries	Fintech sector, new service providers	56%
	Camden Asset Recovery Inter-Agency Network (CARIN)	55%
	Anti-Money Laundering Operational Network (AMON)	54%
	Assessment of international cooperation with third countries (including challenges, information exchange tools, judicial cooperation using bilateral and international tools, and best practices)	50%
	Cooperation with tax authorities (exchange of information and intelligence on missing traders)	50%
	Schengen Information System	48%
	Sharing good cooperation practices, information collected by customs (e.g. cash declarations, trade data)	40%
	EGMONT Group of Financial Intelligence Units	35%
	Naples II Convention, in particular administrative customs cooperation mechanisms	23%
	Role of public–private partnerships, including Europol Financial Intelligence Public Private Partnership	23%
	Association of Law Enforcement Forensic Accountants (ALEFA)	22%
Investigation of crime enablers, lawyers, financial service providers, and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows	Financial investigations of money laundering aimed at infiltrating the legal economy (e.g. trade-based frauds)	83%
	Mapping the criminal business model from a financial perspective	17%

Additional subtopics

Through the survey, respondents had the opportunity to suggest further topics for training, which led to additional inputs related to five main topics.

For **financial investigations and asset tracking, tracing, and recovery for investigators in other crime areas**, Swedish customs officials expressed the need for structured methodologies for **handling data during investigations**. This suggests a broader need within the LE community for developing systematic approaches to data management, particularly given the complexity and volume of data in financial investigations. Rather than introducing a new topic, existing subtopics could be sub-divided to create a more structured approach to storing big data and open-source intelligence.

Diverse suggestions were collected under **modi operandi and emerging crime patterns**, reflecting the complexity of LE professionals' crime patterns. Greek police highlighted the urgency of **understanding and combatting money laundering through unconventional channels, such as gold, precious metals, gambling, and non-traditional financial services such as WISE, Google Gift Cards, and Amazon Coins**. Dutch police also emphasised the role

of virtual currencies in money laundering, calling for best practices in investigating such transactions, identifying perpetrators, and **using financial crime scripting**. These requests point to the need for training on emerging financial crime tactics and tools to counter them, complementing existing subtopics with additional specific channels (e.g. gold, gambling) and methodologies (e.g. financial crime scripting) not explicitly covered in the main topics.

On the **use of modern technologies**, including artificial intelligence, OSINT, and big data analysis, Swedish customs officials underscored the importance of structured approaches to **data handling**, particularly of using modern technology to enhance investigative capabilities. This reflects a broader interest to incorporate technological advancements into LE practices, especially for data analysis and intelligence gathering. It should be noted here that the increased use of modern technologies by LE also raises concerns regarding data protection[25].

For **the role of AROs in tracking, tracing, freezing, and confiscating assets**, respondents suggested a deeper understanding of the operational capacities of AROs across jurisdictions. Swedish customs officials noted the importance of knowing what information can be requested from AROs in different countries—such as property ownership, loans, and condominiums—to enhance financial investigations. Italian police emphasised the value of **transnational information exchange on bank accounts and transactions** to improve asset flow tracking. These suggestions add depth to the current understanding of AROs, proposing more detailed knowledge of international cooperation and inquiry processes.

Regarding **cooperation with customs authorities, EU and international agencies, networks, and third countries**, Greek police recommended training on best practices for combatting smuggling (e.g. tobacco, fuel, alcohol) through enhanced collaboration between the police, coastguards, and customs authorities. This underscores the importance of interagency and international cooperation in addressing transnational crimes and highlights the need for training that fosters collaborative strategies. While the current subtopics address cooperation mechanisms broadly, this suggestion calls for training on specific issues such as smuggling and interagency collaboration.

Urgency and volume of training needs

To better understand the training needs under each main topic, the questionnaire asked respondents to indicate the urgency[26] of training and estimate the number of trainees across the different professional profiles.
Urgency levels for the main topics ranged from 62% to 52%, with the highest urgency attributed to the topic of Cooperation between police, tax, and customs agencies with FIUs

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[25] The EU-STNA 2022-2025, identified the topic of fundamental rights and data protection as one of the core capability gaps to be addressed by training. Data protection and fundamental rights, as a horizontal topic, should be integrated across all training initiatives, and is included as a horizontal topic in all CEPOL training activities.
[26] Urgency in the context of OTNA methodology refers to the critical aspect of timely training intervention and its impact on operational performance. In the analysis, responses were converted into a numerical scale from 1-5, where 1 refers to a low need with a minor expected impact on boosting performance and 5 to a crucial need as a critical response for ensuring the successful performance of duties. See Annex 2 for descriptions of urgency in the OTNA methodology.

and the banking sector in investigation, prevention, and control mechanisms. However, this topic was deemed less relevant (<50% relevancy rate) overall, with a relevancy rate of less than 50%, and therefore does not constitute a training priority. The urgency rating for the main topics ranged between 57% and 52%, suggesting a moderately urgent need for training. This implies that while training within a year would be advantageous to improve the performance, its impact would likely be incremental rather than transformative.

CEPOL's training activities target LE officials from 26 EU MS. The number of potential trainees indicated in the survey responses reflects those who would require training in the responding MS or EU institutions. To estimate the total number of LE officials needing training in each topic at different proficiency levels, the OTNA methodology uses calculations based on the identified statistical median of trainees.

Table 3 reflects the urgency of the training needs and the distribution of trainees, including both median-based statistical estimates and based on the submissions from the responding countries across the topics.

Table 3 - Rating of main topics based on urgency levels and number of trainees estimated at EU level, number of trainees estimated by the respondents

Main topic	Urgency	Estimated number of trainees (EU)	Estimated number of trainees made by respondent MS (actual)
Cooperation of the police, tax and customs agencies with the Financial Intelligence Units and the banking sector in investigation, prevention, and control mechanisms	62%	29 848	2 895
Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows	57%	39 845	4 520
Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)	56%	15 717	7 981
Role of AROs in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators	56%	7 592	1 263
Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas	55%	14 261	1 991
Financial analysis methods including crypto assets and financial forensics	54%	9 334	2 966
Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries	53%	22 997	3 067

Main topic	Urgency	Estimated number of trainees (EU)	Estimated number of trainees made by respondent MS (actual)
Use of modern technologies, including AI, OSINT, and big data analysis	52%	13 455	1 408
Total/average	**56%**	**153 049**	**26 901**

Profiles and proficiency levels

In addition to assessing the overall urgency and number of trainees for each main topic, training needs and trainee volumes were analysed across different proficiency levels. **Practitioners** (41%) and **awareness-level** trainees (23%) represent the largest groups of potential trainees at EU level, followed by advanced practitioners (18%), experts (10%), and Train-the-Trainer professionals (9%)[27].

Table 4 shows a detailed breakdown of the proficiency levels and the number of trainees for all main topics, incorporating both median-based statistical estimates and the submissions from the responding countries across the topics.

Table 4 - Proficiency levels and number of trainees (potential/actual) – all main topics

Proficiency level	Number of trainees(EU)	Number of (actual)
Awareness	35 087	9 384
Practitioner	58 929	7 845
Advanced practitioner	26 208	5 022
Expert	15 366	2 662
Train-the-Trainer	17 459	1 178
Total	**153 049**	**26 091**

Based on the trainee data from the respondent MS, CEPOL training on criminal finances, money laundering, and asset recovery would be most useful for investigators (45%), followed by prosecutors, investigative judges, and magistrates (18%), intelligence officials (13%), analysts (10%), managers (7%), and experts (7%). However, since the OTNA methodology calculates estimates using the median, the projected profiles of potential trainees at EU level show a different picture. In that case, prosecutors, investigative judges, and magistrates comprise the largest group in need of training (46%)[28].

Table 5 provides a detailed distribution of potential trainees' profiles across all main topics, incorporating both median-based statistical estimates and the estimates from the responding countries. It also includes the projected share (%) of trainees by professional profile.

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[27] See the description of proficiency level at Annex 3.
[28] The high number of potential trainees from three respondent countries (Latvia, Italy, and Poland) for some topics was remarkably high at EU level.

Table 5 - Profiles of potential trainees – all main topics

Category	Estimated number of trainees (EU)	Estimated number of trainees (made by the respondent MS)	Share % of all trainees
Investigators	16 445	11 320	11%
Intelligence officials	17 407	3 344	11%
Analysts	15 054	2 752	10%
Managers	14 560	1 844	10%
Prosecutors, investigative judges, magistrates	70 798	4 948	46%
Experts (Forensic, IT, etc.)	17 927	1 850	12%
Other	858	33	1%
Total	**153 049**	**26 091**	**100%**

Trainees per country

For the eight main topics covered in the OTNA survey, Italy had the highest share of anticipated trainees (37%), followed by Sweden (14%), Poland (14%), and Latvia (11%). **Table 6** below shows the number of officials needing training (potential trainees) across the 24 responding countries. These figures reflect the submissions from each country's representatives and have not been adjusted statistically.

Table 6 – Number of potential trainees per responding country, made by respondent MS (all main topics)

Country	Estimated number of trainees	% of all
Italy	9 530	37%
Sweden	3 695	14%
Poland	3 670	14%
Latvia	2 960	11%
Portugal	1 948	7%
Czech Republic	803	3%
Spain	725	3%
Lithuania	440	2%
Malta	406	2%
Slovakia	406	2%
Cyprus	320	1%
Bulgaria	251	1%
Greece	236	1%
Romania	205	1%
Finland	132	1%
Luxembourg	132	1%
Austria	79	<1%
Ireland	51	<1%
France	39	<1%
Germany	27	<1%
Netherlands	16	<1%
Slovenia	16	<1%
Hungary	4	<1%
Total	**26 091**	**100%**

From Italy, three respondents, including two police officials, reported significantly high numbers of professionals, particularly for topics related to the modi operandi: existing and emerging crime patterns (such as non-tangible tokens, new terrorist financing modes, and underground banking). Additionally, one respondent highlighted the involvement of Italian LE professionals in training focused on the role of AROs in tracking, tracing, freezing, and confiscating assets, including virtual ones, mainly aimed at specialised financial investigators and judicial personnel. For these reasons, the overall estimate of Italy's number of potential trainees is notably high.

Additionally, based on feedback from the interviews, the OTNA questionnaires spanned a wide array of topics, potentially falling under the responsibility of multiple departments, and thus complicated the estimation of realistic and precise trainee numbers. Similarly, feedback from Greece, collected through an interview, indicated challenges in providing reliable contributions to the OTNA survey. The respondents, representing various professional backgrounds, sought clarifications from CEPOL on the definitions of profiles and proficiency levels which were not always aligned with professional realities in Greece. Additionally, there could have been more clarity regarding the urgency levels, suggesting a need for more precision in these definitions. The interviews indicated that on-site training would be particularly beneficial for investigators or police officials, including those from other countries, who encounter challenges in identifying ultimate beneficial ownership—a common issue in Greece due to the frequent use of straw men in company formations. Despite employing a range of techniques, such as banking and fiscal analysis, OSINT, wiretapping, and leveraging EU and international cooperation, uncovering the Ultimate Beneficial Owner (UBO) in significant cases remains a considerable challenge, underscoring the importance of tailored training on money laundering. Furthermore, the interviews highlighted the value of joint training for prosecutors. Given their distinct role in criminal proceedings, offering them a broad selection of web-based training options was deemed sufficient, so as to accommodate their educational needs with the logistical constraints of their posts.

Horizontal aspects

In the survey, respondents were presented with six horizontal training topics and asked to rate them based on their relevancy. Three horizontal aspects were identified as the most important: **High-risk criminal networks** rated as number one (82%), followed by **Lawful access to data for law enforcement authorities** (60%), and **Crime prevention** (53%) in third place. **Table 7** below shows the relevancy ratings for all the horizontal training topics.

Table 7 - Relevance of horizontal training topics

Horizontal aspect	Relevancy
High-risk criminal networks	**82%**
Lawful access to data for law enforcement authorities	**60%**
Crime prevention	**53%**
Document fraud	49%
Fundamental rights and data protection	29%
Administrative approach	27%

The OTNA data analysis shows that High-risk criminal networks is rated as the top priority, yet the LE's response to Lawful access to data shows notable variation among the respondent countries. For instance, Hungary, Ireland, Latvia, Poland, Romania, and Slovenia prioritise other topics above High-risk criminal networks. For Hungary, fundamental rights and data protection are more important than High-risk criminal networks. For Ireland, Crime prevention was the most important, followed by High-risk criminal networks. Latvia's approach rated Lawful access to data for LE authorities as the top priority while giving High-risk criminal networks lower priority. For Romania, the Administrative approach was the most important one, followed by Document fraud. These differences potentially point to specific national concerns or operational contexts that diverge from the broader European perspective.

Further training suggestions

In the survey, a small proportion of respondents, nearly 10% (n=4), identified additional training needs beyond the initially outlined scope. These responses were particularly from police officials in **Greece**, **Italy**, and **Latvia**, and they highlighted 12 specific areas where they see a gap in training related to Criminal finances.

The response from Greece articulated seven different topics for further training at varying levels of urgency. The most urgent topic from the Greek point of view would be the **Criminal networks that exploit groups of companies and launder money through the real estate market and the establishment of shell companies** at advanced practitioner level (for ten investigators). The topic of **subsidy fraud** (at advanced practitioner level for ten investigators), the use of advanced software for processing and analysing banking transactions at advanced practitioner level (for 15 investigators), and the investigations of transactions in bitcoin and other cryptocurrencies at practitioner level (for ten investigators) would also be urgent.

The topic of the **Function of the European Public Prosecutor's Office (EPPO) in a theoretical and practical context** (at advanced practitioner level, for 15 investigators) and the management of organisations that fight financial crimes (at expert level, for four analysts) would also be considerable, but not more urgent than the previous ones.

Not essential[29], but an important topic would be **Best practices in relation to the seizure of virtual currencies (law provisions of other countries, preferred portfolios, immediate conversion to fiat currency or maintenance in the format of virtual currency until the final judicial decision, entities that control of virtual currencies after the seizure**) at practitioner level for ten investigators.

The Italian response included two suggestions: the most urgent was Exchange points of contact (which would be urgent at expert level for three investigators and two Intelligence officials). The other suggested topic was not so urgent and was Accessing the legal documents of other national jurisdictions to acquire evidence on fraudulent schemes or money laundering schemes. The need was at an awareness level.

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[29] Urgency level was 1, which means this topic has a minor role in performance boost, it would refresh knowledge, officials could benefit from training, but it is not essential.

In Latvia's response, there were different training suggestions (from legal perspectives) for their whole organisation at advanced practitioner level. Topics defined as urgent were: non-conviction-based confiscation in stand-alone cases, professional money laundering with a stand-alone approach (autonomous legalisation without a predicate offence), sanctions, their circumvention, and international cooperation in the field of sanctions.

Existing training at national and international levels

Information was received from 14 countries[30] about their 64 training initiatives to address criminal finances, money laundering, and asset recovery in 2023. However, many of these responses need more comprehensive details about the specific training content.

The distribution of this training reflects a broad national effort, with **Portugal** leading in the amount of training offered (17%)[31], followed closely by **Greece** and **Latvia** (each at 16%). These training sessions were mainly organised for investigators, police officials, financial specialists, and prosecutors.

Austria highlighted training topics such as big data, cryptocurrencies, and OSINT. At the same time, Hungary noted topics including cash- and trade-based money laundering, the dark web and cryptocurrencies (basic), financial investigations, EU next-generation funds, OSINT, and IT solutions, although without providing detailed information on these subjects.

A detailed overview of the topics and aims of these training initiatives is compiled in **Table 8** below.

Table 8 - Topics and aims/descriptions

Topic (with country code)	Aim	Target group
Exchange point of contact (IT)	Better known exchange procedures	Investigative users
CEPOL training - cybercrime (SI)	Exchange experience	Investigators
CEPOL training - financial investigations (SI)	Exchange experience	Investigators
Carin -AGM meeting (SI)	Exchange experience	Investigators
Amon meeting (SI)	Exchange experience	Investigators
Seminar on problematic issues and their solutions in criminal proceedings on money laundering (LV)	Practical seminar on problematic issues and their solutions in criminal proceedings on money laundering	Prosecutors
Current events of financial investigations in law enforcement institutions in 2023 (LV)	A seminar on the problems of investigating economic crimes	Investigators

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[30] Austria, Bulgaria, Cyprus, Czech Republic, Greece, Hungary, Italy, Latvia, Netherlands, Poland, Portugal, Slovenia, Spain, and Sweden.

[31] Including these topics: Anti-corruption and Economic/Financial Crimes, Anti-Fraud Intelligence Analysis, Forum on Combatting VAT Fraud, Mentoring Programme review, Missing Trader Intra Community Fraud, money laundering, preventing and investigating corruption, without giving any other information about them.

Topic (with country code)	Aim	Target group
Risk-based oversight of Latvian Capital Markets (LV)	Risk assessment for the subjects of the prevention law	Financial specialists
Training on preparation for the 6th evaluation round of Moneyval[32] (LV)	Preparation for Moneyval evaluation	Prosecutors
The Financial Intelligence Unit's conference on crypto assets: shaping the future framework (LV)	Variety of approaches presented globally towards crypto asset regulation and policy	Financial specialists
Training / criminal process discussions on the problems of Money Laundering cases and on the visit of Moneyval experts to Latvia (LV)	Training on how to properly investigate and prosecute money laundering cases	Prosecutors and investigators
The process of criminally obtained property: from FIUs report to the court proceeding (LV)	Practical seminar on money laundering investigation issues	Prosecutors and investigators
Current issues of the application of special confiscation of property. Criminal offences in the field of taxation (LV)	Training on confiscation of property and criminal offenses with taxes	Judges, judge assistants and prosecutors
Participation in the EMPACT seminar Stand-alone money laundering investigation strategies during the pre-trial stage: from intelligence to trial (LV)	Stand-alone investigation strategies	Investigators
The conference 'Future of Anti-Money Laundering: Building Resilience in the Evolving Financial Crime Environment' (LV)	To share best practices on managing and mitigating money laundering risks	Financial specialists
Money laundering (ES)	Specialised training for police officials	Investigators
Corruption (ES)	Specialised training for police officials	Investigators
Determination and securing of assets (PL)	Broadening knowledge	Persons conducting operational and investigative activities
Cybersecurity - the latest trends in cybercrime (PL)	Broadening knowledge	Persons conducting operational and investigative activities
Technical aspects of cybercrime analysis (PL)	Broadening knowledge	Persons conducting operational and investigative activities
Obligations related to the acquisition and disposal of shares in companies (PL)	Broadening knowledge	Persons conducting operational and investigative activities
Functioning of payment institutions, risks associated with the use of these institutions for criminal activities (PL)	Broadening knowledge	Persons conducting operational and investigative activities
Sending notifications to the General Inspector of Financial Information –	Broadening knowledge	Persons conducting operational and investigative activities

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[32]The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism - MONEYVAL is a permanent monitoring body of the Council of Europe, see: https://www.coe.int/en/web/moneyval

Topic (with country code)	Aim	Target group
experience of financial supervision. (PL)		
Fraud at the expense of next generation European resources – intellectual property crime-organised financial crime (EL)	Knowledge upgrade	Police
Maturity model for tax crime investigation (EL)	Presentation of the maturity model with the possibility to apply it to the state after following specific processes/ approval of competent bodies	Financial crime investigative bodies
Money laundering and financial forensics (EL)	Cooperation with royal mounted Canadian police	Police
Investigations on internet enabled intellectual property crime using OSINT intelligence (EL)	Knowledge upgrade	Law community
Money laundering (EL)	Knowledge enrichment	Police
Subject Operation Analysis (EL)	Knowledge enrichment	Police
Anti-Corruption and Economic Crimes (EL)	Disruption of financial crime through sharing of best practices among investigative bodies of the EU and Arabic states	Police and other investigative bodies
2023 Conducting financial investigations (foundation) programme (EL)	Boost the knowledge on VAT fraud, advanced interviewing, international cooperation, money laundering/legal challenges, asset recovery, crypto currencies	Police, FIUs, investigative bodies under Ministry of Finance
Money laundering and terrorist financing indicators: A handbook for tax auditors and tax examiners (EL)	Presentation of the content of the handbook with the aim to enhance the knowledge	Financial crime investigative bodies
Fighting Tax Crime: the Ten Global Principles/ practitioner (EL)	Presentation of the content of the handbook	Financial crime investigative bodies
Criminal finances (NL)	Introducing the system of financial crime scripting	Police
Underground Banking (NL)	Understanding of how underground banking works and how to recognise and investigate it	Law enforcement and Intelligence officials
Financial Crime Scripting (NL)	Learning to incorporate the financial aspects (money flows) in crime scripting	Analysts
Asset Recovery Training (CY)	To increase the awareness of police investigators on the importance of asset recovery in combatting serious and organised crime	Police investigators, Managers, Experts of Financial Crime Units
Sanctions violations and M/L (CY)	To enhance the capacity of police investigators in investigating cases related to sanctions violations	Police investigators, Managers, Experts of Financial Crime Units
Countering Financing of Terrorism (CY)	To enhance the capacity of police investigators and managers in investigating cases related to financing of terrorism	Police investigators, Managers, Experts of Financial Crime Units

Topic (with country code)	Aim	Target group
Financial Crime Course (CY)	To enhance the capacity of police investigators and experts in investigating cases and performing financial analysis related to financial crime	Police investigators, Managers, Experts of Financial Crime Units
Public Private Partnerships, Serious and Organised crime network (CY)	Exchange of views between various organisations and government bodies for conducting the PPP project in Cyprus	Police Managers of Financial Crime Units
Kleptocracy training (PT)	Sanctioning and asset recovery of transnational high-level corruption	Experts on asset recovery
International ASSET RECOVERY (PT)	International asset recovery	Experts on asset recovery
Financial investigations in wildlife/timber trafficking (PT)	Financial investigations in wildlife/timber trafficking	Experts on asset recovery
CEPOL 2008/2023/ONL Money laundering I (SE)	This online course is about the criminal finances and money laundering typologies. the overall objective of this training is enhancing knowledge on the application of financial investigative techniques in combatting serious crime, and it is dedicated to law enforcement officials specialised in criminal investigations and/or intelligence collection and analysis of any kind of serious crime.	Operational

These data indicate that on-site training is the most common mode of delivery among respondents, with 67% opting for in-person sessions. Online courses (15%) and webinars (19%) are reported less frequently, suggesting a strong preference for traditional, face-to-face training environments over digital formats.

Topics and subtopics of the training

Financial analysis methods, including crypto assets and financial forensics

The topic of financial analysis methods, including crypto assets and financial forensics, was considered highly relevant by the respondents, receiving an 88% relevance from 21 countries[33]. However, the urgency for addressing this topic was moderate, with a 54% urgency rate. The identified needs were evenly distributed between the organisational and unit levels (40.6% each), with 18.8% of responses indicating a need at national level. While no subtopics were specifically outlined under this main topic, the high level of relevancy suggests a significant need for comprehensive training on methods and technologies used in financial analysis, particularly in emerging areas such as crypto assets.

Table 9 - Profiles and number of potential trainees – Financial analysis methods including crypto assets and financial forensics

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	104	260	130	130	0	624	222
Experts (Forensic, IT, etc.)	52	156	52	247	26	533	159
Intelligence officials	910	325	52	52	26	1 365	596
Investigators	1 079	520	130	130	39	1 898	1 528
Managers	260	78	52	0	0	390	72
Other	0	104	0	0	0	104	4
Prosecutors, investigative judges, magistrates	130	4 160	130	0	0	4 420	385
Total	**2 535**	**5 603**	**546**	**559**	**91**	**9 334**	**2 966**

Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas

The topic of financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas was considered relevant by 83% of respondents from 20 countries[34]. However, the urgency was rated as moderate at 55%. The identified training needs were distributed across different levels, with 45% focused on the unit level, 34% at the organisational level, and 21% at the national level. Four subtopics were associated with this main topic, two of which - technical priorities and aspects of investigations and big data analysis - were ranked as relevant. Additionally, Swedish respondents proposed further

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[33] Austria, Bulgaria, Cyprus, Czech Republic, Finland, France, Germany, Greece, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.
[34] Austria, Bulgaria, Cyprus, Czech Republic, Estonia, France, Germany, Ireland, Italy, Latvia, Lithuania, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

training on structured methodologies for working with data, highlighting the importance of efficient data handling in financial investigations.

Table 10 - Relevancy rating of subtopics - Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas

Main topic	Subtopic	Relevancy
Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas	**Technical priorities and aspects of investigations**	**58%**
	Big data analysis	**53%**
	OSINT	38%
	Possibilities of AI in financial investigations	38%

Table 11 - Profiles and number of potential trainees – Financial investigations and asset tracking, tracing, and recovery for investigators of other crime areas

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	78	143	780	260	26	1 287	220
Experts (Forensic, IT, etc.)	26	0	104	52	0	182	21
Intelligence officials	0	312	520	130	130	1 092	187
Investigators	260	260	520	208	182	1 430	1 136
Managers	221	52	52	143	78	546	53
Other	0	104	0	0	0	104	4
Prosecutors, investigative judges, magistrates	0	8 320	1 300	0	0	9 620	370
Total	**585**	**9 191**	**3 276**	**793**	**416**	**14 261**	**1 991**

Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)

The topic of modi operandi, covering existing and emerging crime patterns such as non-tangible tokens, new modes of terrorist financing, and underground banking, was deemed relevant by 83% of respondents from 20 countries[35], though the urgency level was moderate at 56%. The identified needs were distributed across different levels, with 38% at the unit level, 34% at the organisational level, and 28% at the national level.

Although this topic included ten subtopics, three stood out as the most relevant: Money laundering via virtual currencies and complex financial schemes, International money laundering bolstered by trade-based money laundering (e.g. fictitious contracts and invoices), and Corporate economic crime and fraud schemes (such as subsidy fraud, bank fraud, investment fraud, CEO fraud, and social benefits fraud).

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[35] Austria, Bulgaria, Cyprus, Czech Republic, Finland, France, Germany, Greece, Italy, Latvia, Lithuania, Luxembourg, Malta, The Netherlands, Poland, Portugal, Romania, Slovenia, Spain, and Sweden.

Table 12 - Relevancy rating of subtopics - Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)

Main topic	Subtopic	Relevancy
Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)	**Money laundering via virtual currencies, and complex financial schemes**	**65%**
	International money laundering bolstered by trade-based money laundering (e.g. fictitious contracts and invoices)	**54%**
	Corporate economic crime and fraud schemes (subsidy fraud, bank fraud, investment fraud, CEO fraud and social benefit fraud)	**53%**
	Money laundering via normal financial system (electronic)	48%
	Money laundering as crime-as-a-service, illegal sale of unlicensed financial services	46%
	Offshore challenge to conceal beneficial ownership	44%
	Cash-collection networks	44%
	Links to corruption	38%
	Underground banking system including informal value transfer systems (e.g. hawala)	31%
	Money laundering via high value goods, especially cultural goods and services	26%

Respondents from Greece and the Netherlands suggested additional subtopics, reflecting the evolving nature of financial crimes. These included Money laundering via gold, precious metals, and gambling[36], best practices for investigating financial transactions enabled by non-traditional foreign banking services like WISE, Google Gift Card, and Amazon Coins[37], and best practices for investigating virtual currency transactions and identifying perpetrators. There was also a call for training on using appropriate software[38] and financial crime scripting to tackle these challenges at the EU level.

Table 13 - Profiles and number of potential trainees – Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing, underground banking)

	Awareness	Practitioner	Advanced practitioner	Awareness	Expert	Total (EU-level)	Total (actual)
Analysts	1 430	208	130	156	169	2 093	831
Experts (Forensic, IT, etc.)	1 430	1 300	195	260	169	3 354	659
Intelligence officials	910	260	416	650	104	2 340	773
Investigators	858	403	338	208	78	1 885	3 972
Managers	481	91	169	130	78	949	550
Other	0	104	234	0	0	338	13

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[36] EL, police

[37] EL, police

[38] EL, police

	Awareness	Practitioner	Advanced practitioner	Awareness	Expert	Total (EU-level)	Total (actual)
Prosecutors, investigative judges, magistrates	1 690	1 430	780	780	78	4 758	1 183[39]
Total	**6 799**	**3 796**	**2 262**	**2 184**	**676**	**15 717**	**7 981**

Use of modern technologies, including Artificial intelligence, open-source intelligence, and big data analysis

The topic of use of modern technologies, including AI, OSINT, and big data analysis, was rated as relevant by 83% of respondents from 20 countries[40], although the urgency was considered moderate at 52%. The training needs for this topic were distributed across unit-level (41%), organisational-level (38%), and national-level (21%) applications. Four subtopics were presented under this main topic, but only one, namely the Possibilities of AI in financial investigations, was identified as clearly relevant by respondents.

Table 14 - Relevance rate of subtopics - Use of modern technologies, including Artificial intelligence, open-source intelligence and big data analysis

Main topic	Subtopic	Relevancy
Use of modern technologies, including Artificial intelligence, open-source intelligence and big data analysis	**Possibilities of AI in financial investigations**	**53%**
	Big data analysis	49%
	Technical priorities and aspects of investigations	44%
	OSINT	36%

Table 15 - Profiles and number of potential trainees – Use of modern technologies, including Artificial intelligence, open-source intelligence and big data analysis

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	78	234	78	130	0	520	52
Experts (Forensic, IT, etc.)	26	0	130	52	52	260	24
Intelligence officials	845	520	156	52	52	1 625	146
Investigators	715	364	195	52	78	1 404	727
Managers	286	52	39	130	0	507	80
Other	0	104	0	0	0	104	4
Prosecutors, investigative judges, magistrates	0	8 320	715	0	0	9 035	375
Total	**1 950**	**9 594**	**1 313**	**416**	**182**	**13 455**	**1 408**

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[39] A respondent from Latvia gave 370 prosecutors for every topic, for this topic there were numbers from Poland and Italy.

[40] Austria, Bulgaria, Cyprus, Czech Republic, Finland, France, Germany, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and Sweden.

Role of Asset Recovery Offices in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators

The Role of AROs in tracking, tracing, freezing, and confiscating assets, including virtual ones, for specialised financial investigators was rated as relevant by 63% of respondents from 15 countries[41], with a moderate urgency level of 56%. Training needs for this topic were distributed across organisational (43%), unit (38%), and national (19%) levels.

Three of the five subtopics presented were identified as relevant: the systematic launch of financial investigations, the role of Asset Recovery Offices, and pre-seizure planning. Additionally, further information is needed on what specific data can be requested from different countries during transnational information exchanges, such as details on bank accounts, goods, and transaction invoices, to improve the tracking of asset flows and placements.[42]

Table 16 - Relevancy rating of subtopics - Role of Asset Recovery Offices in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators

Main topic	Subtopic	Relevancy
Role of Asset Recovery Offices in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators	**Systematic launch of financial investigations**	**78%**
	Role of AROs	**75%**
	Pre-seizure planning	**50%**
	Importance of interlocutory sales	25%
	Sanctions evasions in relation to money laundering and asset recovery	22%

Table 17 - Profiles and number of potential trainees – Role of Asset Recovery Offices in tracking, tracing, freezing and confiscating assets (including virtual ones) for specialised financial investigators, including training for judicial investigators

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	169	104	169	130	13	585	66
Experts (Forensic, IT, etc.)	0	26	0	39	26	91	27
Intelligence officials	325	156	286	13	26	806	150
Investigators	312	260	156	52	26	806	572
Managers	260	26	52	52	39	429	73
Prosecutors, investigative judges, magistrates	0	4 225	650	0	0	4 875	375
Total	**1 066**	**4 797**	**1 313**	**286**	**130**	**7 592**	**1 263**

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[41] Austria, Cyprus, Czech Republic, Estonia, France, Hungary, Ireland, Italy, Latvia, Lithuania, Poland, Portugal, Romania, Slovakia, Spain, and Sweden.
[42] From Sweden and Italy.

Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third (non-EU) countries

Respondents from 14 countries[43] rated Cooperation with customs authorities, EU and international agencies, networks, and cooperation with third (non-EU) countries as moderately relevant (58%), with an urgency level of 53%. Training needs for this topic were proposed based on requirements at the unit (38%), national (33%), and organisational (29%) levels. Of the 14 subtopics presented, eight were identified as relevant. Additionally, a suggestion was made to include best practices for combatting smuggling (e.g. tobacco, fuel, alcohol) through enhanced cooperation between the police, coastguards, and customs authorities.

Table 18 - Relevancy rating of subtopics - Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries

Main topic	Subtopic	Relevancy
Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third (non-EU) countries	**Role of EU agencies**	**68%**
	ARO platform	**67%**
	Cooperation with Interpol	**59%**
	Fintech sector, new service providers	**56%**
	Camden Asset Recovery Inter-Agency Network (CARIN)	**55%**
	Anti-Money Laundering Operational Network (AMON)	**54%**
	Level and an assessment on international cooperation with third countries (including challenges, information exchange tools, judicial cooperation using bilateral and international tools, and best practices)	**50%**
	Cooperation with tax authorities (exchange of information and intelligence on missing traders)	**50%**
	Schengen Information System	48%
	Sharing good cooperation practices, information collected by customs (e.g. cash declarations, trade data)	40%
	EGMONT Group of Financial Intelligence Units	35%
	Naples II Convention, in particular administrative customs cooperation mechanisms	23%
	Role of public–private partnerships, including Europol Financial Intelligence Public Private Partnership	23%
	Association of Law Enforcement Forensic Accountants (ALEFA)	22%

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[43] Bulgaria, Cyprus, France, Germany, Greece, Italy, Latvia, Lithuania, Poland, Portugal, Romania, Slovenia, Spain, and Sweden.

Table 19 - Profiles and number of potential trainees – Cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, cooperation with third countries

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	260	65	858	104	1 040	2 327	340
Experts (Forensic, IT, etc.)	130	130	1 560	286	546	2 652	336
Intelligence officials	390	182	715	52	546	1 885	401
Investigators	481	104	78	78	78	819	885
Managers	195	78	858	689	1 040	2 860	361
Other	0	104	0	0	0	104	4
Prosecutors, investigative judges, magistrates	3 120	5 460	1 430	1 300	1 040	12 350	740
Total	**4 576**	**6 123**	**5 499**	**2 509**	**4 290**	**22 997**	**3 067**

Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows

Respondents from 12 countries[44] rated the topic of investigating crime enablers, lawyers, financial service providers, and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows as barely relevant (50%), with an urgency level of 57%. Training needs for this topic were distributed across national (35%), unit (35%), and organisational (30%) levels. Of the two subtopics presented, one was identified as relevant.

Table 20 - Relevancy rating of subtopics - Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows

Main topic	Subtopic	Relevancy
Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows	**Financial investigations on money laundering aimed at infiltrating legal economy (e.g. trade-based frauds)**	**83%**
	Mapping the criminal business model from a financial perspective	17%

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[44] Czech Republic, Estonia, France, Germany, Ireland, Italy, Latvia, Lithuania, Netherlands, Portugal, Romania, and Sweden.

Table 21 - Profiles and number of potential trainees – Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	1 690	1 040	1 560	715	1 040	6 045	678
Experts (Forensic, IT, etc.)	1 066	1 820	1 560	286	546	5 278	316
Intelligence officials	2 080	780	351	650	546	4 407	728
Investigators	2 509	780	780	1 300	689	6 058	1 733
Managers	702	1 820	1 560	715	1 040	5 837	335
Prosecutors, investigative judges, magistrates	2 600	5 200	1 560	1 560	1 300	12 220	730
Total	**10 647**	**11 440**	**7 371**	**5 226**	**5 161**	**39 845**	**4 520**

Cooperation of the police, tax and customs agencies with the Financial Intelligence Units and the banking sector in investigation, prevention and control mechanisms

According to the respondents from 10 countries[45], the cooperation of the police, tax and customs agencies with the FIUs and the banking sector in investigation, prevention and control mechanisms was not considered relevant (42%). However, its urgency was higher than other main topics, with a 62% urgency rate. The needs for this topic were proposed at unit level (47%), organisational level (27%), and national level (27%). No subtopics were presented under this main topic.

Table 22 - Profiles and proficiency level – Cooperation of the police, tax and customs agencies with the Financial Intelligence Units and the banking sector in investigation, prevention, and control mechanisms

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the Trainer	Total (EU-level)	Total (actual)
Analysts	156	182	143	52	1 040	1 573	343
Experts (Forensic, IT, etc.)	1 105	1 820	1 560	52	1 040	5 577	308
Intelligence officials	1 053	351	780	663	1 040	3 887	363
Investigators	390	546	299	117	793	2 145	767
Managers	1 105	52	156	689	1 040	3 042	320
Other	0	104	0	0	0	104	4
Prosecutors, investigative judges, magistrates	3 120	5 330	1 690	1 820	1 560	13 520	790
Total	**6 929**	**8 385**	**4 628**	**3 393**	**6 513**	**29 848**	**2 895**

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[45] France, Germany, Greece, Italy, Latvia, Lithuania, Malta, Poland, Portugal, and Romania.

Feedback from the Expert Group Meeting

Following the distribution of the draft OTNA report, the Expert Group[46] convened virtually on Wednesday, 17 April 2024, to examine and confirm the findings and discuss the responses through EU-level training. This section presents the key results of the meeting along with a summary of the suggested enhancements to the training portfolio on criminal finances, money laundering and asset recovery.

It was acknowledged that the analysis resonates well with the general impressions of the current training demands of what practitioners seek, and the Report was adopted by the Expert Group. An unexpected insight was the perceived lack of relevance attached to cooperation with financial institutions, especially banks. This observation was noted as surprising, given the evolving landscape of financial crimes and the anticipated updates to the anti-money laundering legislative framework. The shift from traditional document fraud to cryptocurrency and other virtual assets was highlighted as a significant trend, underscoring the increasing complexity of illegal transactions and the growing need for specialised knowledge in these areas. Despite this, the discussions revealed that current education programmes might already sufficiently cover cooperation at operational level, suggesting a need for a more focused approach in future training initiatives.

It was positively welcomed to see prosecutors and judges represented in the OTNA findings. However, a question arose concerning the representation of judicial authorities in the survey. Although only a small share of the respondents (5%) directly represented the judiciary[47], the processed data revealed a substantial demand for training among prosecutors, investigative judges, and magistrates—constituting nearly half of the potential trainees. It is important to note that these estimations of potential trainees also broadly reflect the views of other sectors, meaning that various LE officials beyond the judiciary have expressed training needs in this professional segment.

Regarding the judiciary's training needs, there is an impression that more training in operational procedures is required. It was noted that CEPOL collaborates extensively with the European Judicial Training Network (EJTN) and the Directorate-General for Justice and Consumers (DG JUST) to enhance access to training for judicial figures. Both online platforms and onsite training sessions are tailored to include a diverse audience, with specific allocations for prosecutors and judges. The discussion briefly touched upon a possible collaboration between CEPOL and the European Union Agency for Law Enforcement Cooperation (Europol) on courses related to the protection of EU public funds and financial investigations.

The potential development of a certified training programme in financial investigations, possibly in the future leading to a master's degree, was also discussed as an opportunity to standardise procedures and qualifications across the EU. The Expert Group was informed about CEPOL's foreseen strategic move towards establishing a diploma course in financial investigations. Furthermore, CEPOL is considering developing a sectoral qualifications framework on cross-border operational cooperation that aims to systematically organise

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[46] Attended by representatives from CEPOL and Europol.
[47] Namely the Office of the Prosecutor General of Estonia and the Prosecutor General's Office of the Republic of Latvia.

learning outcomes and align them with various levels of expertise, potentially culminating in accredited programmes based on further needs and available resources.

CEPOL's current training portfolio comprises a set of onsite activities, webinars, and online courses specifically tailored to address key aspects of criminal finances. This year, four onsite training sessions spanning four to five days each are scheduled. These include sessions on Money Laundering Typologies, Financial Investigations—protection of EU Funds, International Asset Recovery, and Financial Investigations. In addition to the onsite activities, CEPOL has implemented two introductory-level webinars on Criminal Finances and Money Laundering. These webinars serve to raise awareness among trainees about fundamental concepts in financial crimes. The online course offerings include three courses that are not self-paced but moderated, mirroring the structure of onsite sessions with group work and presentations. These courses cover advanced topics such as FinTechs and payment services from the LE perspective, as well as Money Laundering, delivered in collaboration with third-party providers. They provide in-depth knowledge beyond what is typically covered in webinars. A specialised webinar on Hawala, in partnership with the United Kingdom authorities involved in the EMPACT migrant smuggling operational action plan, is also part of the portfolio.

Looking ahead to 2025, the training portfolio is expected to remain largely consistent with the current offering, with one notable change. The session on Financial Investigations – Protection of EU Funds will be replaced by a more focused session on Financial Analysis and Investigation. This adjustment aligns with the findings from the OTNA analysis, ensuring that the training remains relevant and timely. Collaboration in 2024 with the head of security from Binance of Asia on cryptocurrency indicates a proactive approach to integrating cutting-edge topics within the training modules. Discussions led to a consensus on continuing to incorporate such subjects, including the exploration of artificial intelligence and crime enablers, which are already covered to some extent within the existing framework.

The integration of horizontal aspects such as high-risk criminal networks, lawful access to data, crime prevention, document fraud, fundamental rights, data protection, and administrative approaches was discussed. The group explored the possibility of blending these themes within the criminal finances training portfolio, potentially through webinars or as pre-assignment tasks linked to onsite activities. CEPOL's fundamental rights package is set for all courses in the LEEd platform, ensuring that topics like data protection are comprehensively covered. The possibility of including additional modules or webinars on high-risk criminal networks was proposed to enhance this coverage. The administrative approach, despite being rated as low in importance by the respondents, was recognised by the experts as important. It was suggested that the perceived lack of importance could stem from a lack of understanding rather than true irrelevance, highlighting the need for better awareness and integration of this topic in the training modules.

In the format of a written consultation, the EMPACT Group representative emphasised the risks of the new payment methods. Europe opened its payment market[48] in combination with the rapidly growing technological development, giving room to payment service providers, neon banks, virtual IBANs, etc. Consequently, it has become harder to follow the money, especially when the service provider is located in another EU MS or outside Europe. Criminals

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[48] The Revised Payment Services Directive (PSD2), Directive (EU) 2015/2366.

spot these opportunities, and LE officials need to improve their knowledge through training to recognise these risks.

Conclusions

Organised crime is profit-driven - its illegal activities generate profits estimated at over EUR 139 billion annually. These profits allow organised crime to finance further crime and infiltrate the legal economy and public institutions. The EU recognises that dismantling these financial networks through targeted financial investigations and asset recovery is crucial to combatting organised crime effectively.[49] In 2021, the Commission adopted a legislative package[50] focused on anti-money laundering and countering the financing of terrorism. Currently, it is in the process of establishing a dedicated Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA)[51]. Addressing criminal finances, money laundering, and asset recovery is a key aim within the wider EMPACT priority on Fraud, Economic, and Financial Crimes. Also, the EU-STNA, and the related Mid-term Review Report, have highlighted the necessity for LE professionals to be well-equipped to address both current and evolving criminal patterns.

This OTNA, dedicated to the topic of criminal finances and informed by 41 individual responses from LE bodies across 24 EU MS, further underscores a significant and widespread training demand. Its key findings reveal the highest relevancy for the topic of financial analysis methods (including crypto assets and financial forensics). This need is shortly followed by financial investigations along with asset tracking, tracing, and recovery, and the modi operandi, covering the exploration of existing and emerging crime patterns like non-tangible tokens, new terrorist financing modes, and underground banking. Furthermore, the adoption of modern technologies, including AI, OSINT, and big data analysis, also holds a high relevancy. The critical function of AROs in the management of assets further delineates specialised needs for financial investigators and judicial personnel. Moreover, cooperation with customs authorities, EU and international agencies, EU and international networks, existing and new instruments, and cooperation with third countries is also considered important, highlighting the necessity for a collaborative approach in tackling financial crimes across borders.

The study identified that within the realm of training related to criminal finance, the horizontal aspects of high-risk criminal networks, lawful access to data for LE authorities, and crime prevention emerged as most pertinent. Fundamental rights and data protection, along with the administrative approach, were considered less critical on a broad scale but continue to hold importance and should be integrated across all training initiatives.

The training demand distribution showcases a substantial need for practitioners' training, followed by awareness-level and advanced practitioners. Based on the data analysed at the EU level, prosecutors, investigative judges, and magistrates represent the largest demographic in need, emphasising the multidisciplinary nature of the requisite skill

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[49] https://home-affairs.ec.europa.eu/policies/internal-security/organised-crime-and-human-trafficking/confiscation-and-asset-recovery_en
[50] https://finance.ec.europa.eu/publications/anti-money-laundering-and-countering-financing-terrorism-legislative-package_en
[51] https://ec.europa.eu/commission/presscorner/detail/en/ip_24_972

enhancement. However, it is noteworthy that the non-prioritised submissions predominantly cater to investigators, with diminishing requests for prosecutors, judges, magistrates, intelligence officials, and analysts.

In the face of the evolving landscape of financial crimes, a continuous adaptation and enhancement of the EU LE training offering is critical. Based on the OTNA findings, there is a clear need to integrate detailed training on emerging technologies such as AI, OSINT, and big data analysis into financial investigations, equipping LE officials with the tools and methodologies necessary to tackle modern financial crimes effectively. Additionally, a focus on the modi operandi of financial crimes, including digital currencies, trade-based money laundering, corporate fraud, and sophisticated schemes, calls for targeted training to ensure that LE officials have a thorough understanding of these complexities and are prepared to dismantle such networks. The role of AROs, particularly in managing virtual assets, underscores the importance of specific training on launching investigations, asset recovery techniques, and pre-seizure planning for successful asset confiscation. Similarly, addressing new crime patterns, such as non-tangible tokens, novel terrorist financing modes, and underground banking, necessitates ongoing and timely education to improve LE preparedness for these emerging threats. Moreover, the shift towards utilising AI in financial investigations represents a significant evolution in crime-fighting strategies, calling for training that familiarises LE with these technologies for deep analysis and crime detection. The value of international cooperation, working with EU agencies, the ARO platform, and international bodies such as Interpol remains an important element. EU LE training should continue to highlight the benefits of international networks, adapt to the changing Fintech sector, and promote a unified and effective global strategy in the fight against financial crimes. This includes fostering interdisciplinary training that encourages collaboration across various LE branches—police, customs, judicial, tax, and FIU experts—and with judicial officials to foster a unified approach to investigations and prosecutions.

The OTNA findings are in line with the ongoing political developments in the EU, aimed at providing LE with better and faster access to financial information[52] and underscoring the increasing importance of financial investigations, asset recovery, and the use of modern technologies in LE efforts. It will likely necessitate updates and expansions in training curricula to include not only the practical application of these new rules and procedures, but also to address the need for specific skills and knowledge areas related to accessing and analysing financial data, understanding legal safeguards, and engaging in effective cross-border cooperation.

Given the relatively high demand for training, a potential solution could involve expanding online learning platforms to offer more accessible and scalable training opportunities to LE personnel across the EU. Although the provision of awareness-level training is not a task for EU training providers but is expected to be managed at the national level instead. The notable demand for comprehensive basic training indicates the need to consider potential support measures that could assist the national-level training providers. This could include collaboration and resource-sharing and promotion of EU LE training resources to ensure comprehensive training coverage and access to information across all levels.

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[52] https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3091

Annex 1 - EU-STNA Chapter on Criminal finances, money laundering and asset recovery

Criminal finances, money laundering and asset recovery are linked to all areas of organised crime, as financial benefit is one of the main motivations behind criminal activities. There are more opportunities to hide assets and criminal proceeds due to the rise in parallel financing systems, the exploitation of offshore structures, the complexity of trade-based money-laundering schemes, and the use of cryptocurrencies. Transnational investigations remain resource-intensive and lengthy, and the widespread use of encryption technology by criminals further hinders operative efforts.

The implementation of the current legislation on anti-money laundering is lagging behind, while it appears necessary to develop a common legislative framework concerning emerging parallel financial systems and cryptocurrencies. Legislation on freezing and confiscating assets also needs improvement.

The capacities and tools of asset recovery offices, financial intelligence units and financial investigation bodies should be substantially reinforced.

The disruption of criminal networks could be enhanced by applying the 'follow the money' approach, since criminals use varied financial schemes to hide and legalise criminal assets. Money laundering requires special financial and legal expertise; therefore, it is frequently offered in the form of crime-as-a-service by organised crime groups (OCGs) or specialised providers. Investigators in all crime areas should be aware of the possible financial schemes and methods used to hide criminal assets as well as of the importance of launching financial investigations and asset recovery in economically oriented criminal cases. The knowledge of law enforcement services on the use of artificial intelligence, and on handling and analysing large amounts of data from different sources should be improved. Officials' capacity to use OSINT also needs development. It is essential to make better use of existing EU instruments and institutions, with special regard to the new institutional landscape resulting from the establishment of the European Public Prosecutor's Office (EPPO). Cooperation with non-EU countries and the development of their financial investigation capacities should be enhanced as criminal assets are frequently hidden outside the EU.

Training in this area should target all law enforcement officials and provide a general introduction to criminal finances so that they are able to track the financial flows and assets behind any type of criminal activity. Training specifically designed for financial investigators should focus on the modi operandi of criminals and the methods of tracing, freezing and confiscating criminal assets. Special attention should be given to digital tools and new technologies to be used during investigation. The Member States indicated that 8 706 officials need training in this area.

List of identified and prioritised training needs

1. Modi operandi: existing and emerging crime patterns (non-tangible tokens, new modes of terrorist financing), criminal financing methods: cash-based (cash carriers, money mules), money laundering via normal financial system (electronic), offshore challenge to conceal beneficial ownership, informal value transfer systems (e.g. hawala), underground banking, international money laundering bolstered by fictitious contracts and invoices, bitcoin trading, trade-based money laundering, money laundering via virtual currencies, and complex financial schemes. Training should also cover money laundering as crime-as-a-service, illegal sale of unlicensed financial services, money laundering via high value goods and services, corporate economic crime and fraud schemes (subsidy fraud, bank fraud, investment fraud, CEO fraud and social benefit fraud).
2. Tracking, tracing, freezing and confiscating assets, opportunities to hide assets quickly, intelligence on criminal turnovers and profits, including training for judicial investigators; automatic launch of financial investigations; preseizure planning; importance of interlocutory sales.
3. Financial investigations and asset recovery for investigators of other crime areas: general basic knowledge on financial investigations and asset recovery, EU/international framework, new EU/international initiatives, directives, rules, tools, multidisciplinary approach, administrative cooperation, role of customs and tax authorities, cooperation with tax authorities and the judiciary; automatic launch of financial investigations; pre-seizure planning; importance of interlocutory sales; management of confiscated assets and social reuse of criminal assets.
4. Technicalities and information priorities, technical aspects of investigation, modern technologies, use of AI, big data analysis and OSINT, technicality of virtual coins (seizures).
5. Training on cryptocurrencies for general investigators.
6. Institutional training addressing a new landscape: implementation of the EPPO Regulation, the roles of EPPO, OLAF, Europol, Eurojust, European Judicial Cybercrime Network (EJCN) and national authorities. The EU directives, tools available in the Member States.
7. Financial analysis methods and financial forensics.
8. Investigation of crime enablers, lawyers, financial service providers and real estate agents who knowingly and wittingly provide services to facilitate criminal financial flows.
9. Cooperation with customs authorities, EU agencies, existing and new instruments, Naples II Convention, administrative customs cooperation mechanisms, Camden Asset Recovery Inter-agency Network (CARIN), AntiMoney Laundering Operational Network (AMON), EGMONT Group of Financial Intelligence Units, Association of Law Enforcement Forensic Accountants (ALEFA), sharing good cooperation practices, information collected by customs (e.g. cash declarations, trade data); cooperation with tax authorities (exchange of information and intelligence on missing traders).
10. Roles of financial institutions in anti-money laundering, public–private partnership; roles of European Union Agency for Fundamental Rights, European Court of Justice and European Court of Human Rights in anti-money laundering; case studies on fundamental rights and data protection issues in criminal investigations.
11. Roles of the police, tax and customs agencies and the financial sector in prevention/control mechanisms.
12. Fundamental rights and data protection.

Annex 2 Urgency levels

Urgency in the context of this questionnaire refers to the critical aspect of timely training intervention and its impact on operational performance.

Urgency scale level	1	2	3	4	5
Training need is:	Low	Secondary	Moderate	Urgent	Crucial
Training impact	Training has a minor role in performance boost, it would refresh knowledge, officials could benefit from training, but it is not essential.	It would be useful if the training were delivered, although the need is not urgent. Training can be delivered in (predictable) 2-3 years' time, it is needed to stay updated.	It would be advantageous to receive training within a year's period, it would improve the performance, however, not significantly.	Training is essential, it needs to be delivered within a year's period, it is important for qualitative performance.	Training is critical, it is needed as soon as possible, it is crucial for the successful performance of duties.

Annex 3 Proficiency levels

	Level 1 – Awareness	Level 2- Practitioner	Level 3 – Advanced Practitioner	Level 4 - Expert	Level 5 – Train-the-Trainer
Definition	Refers to those who only need an insight into the particular topic, they do not need specific skills, competences and knowledge to perform the particular tasks, however they require general information in order to be able to efficiently support the practitioners working in that particular field.	Refers to those who independently perform their everyday standard duties in the area of the particular topic.	Has increased knowledge, skills and competences in the particular topic because of extended experience, or a specific function/role, i.e. team/unit leader.	Has additional competences, highly specialised knowledge and skills. Is at the forefront of knowledge in the particular topic.	Officials who are to be used as trainers for staff
Description	Has a general factual and theoretical understanding of what the topic is about, understands basic concepts, principles, facts and processes, and is familiar with the terminology and standard predictable situations. Has a duty to contribute to the performance of practitioners in the particular field.	Has a good working knowledge of the topic, is able to apply the knowledge in the daily work and does not require any specific guidance in standard situations. Has knowledge of possible situation deviations and can apply necessary skills in practice. Can assist in solution development for abstract problems. Is aware of the limits of their knowledge and skills, is motivated to develop their self-performance.	Has broad and in-depth knowledge, skills and competences including a critical understanding of theories and principles. Is able to operate in conditions of uncertainty, manage extraordinary situations and special cases independently, solve complex and unpredictable problems, direct the work of others. Is able to share their knowledge with and provide guidance to less experienced colleagues. Is able to discuss issues with a sceptical colleague, counter sophisticated denialist opinions and arguments for inaction.	Has extensive knowledge, skills and competences, is able to link the processes to other competency areas and assess the interface as a whole. Is able to provide tailored advice with valid argumentation. Is able to innovate, develop new procedures and integrate knowledge from different fields. Is (fully or partially) responsible for policy development and strategic performance in the particular area.	Has the knowledge and skills to organise training and appropriate learning environment using modern adult training methods and blended learning techniques. Is familiar with and can apply different theories, factors and processes of learning in challenging situations. Experienced with different methods and techniques of learning. Can prepare and conduct at least one theoretical and one practical training session for law enforcement officials.
EQF equivalent	EQF Level 3-4	EQF Level 5	EQF Level 6	EQF Level 7	
EQF levels – Descriptors of defining levels in the European Qualifications Framework, more information is available at https://europa.eu/europass/en/description-eight-eqf-levels					

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