

Operational Training Needs Analysis
Criminal finance, money laundering
and asset recovery

EDUCATE, INNOVATE, MOTIVATE

Operational Training Needs Analysis

Criminal finance, money laundering and asset recovery

2020

Contents

Contents	3
List of abbreviations	4
Executive Summary	5
Background	10
Analysis	10
Consolidation of data	10
Response rate	10
Relevance of main topics	11
Training dimensions	12
Identification of subtopics	15
National level training	18
Training dimensions for main topics	20
1. Prevention of money laundering	20
2. Financial intelligence analysis investigations	22
3. Tracing and recovery of proceeds from crime	25
4. International cooperation	26
5. Financial investigations	29
6. Cooperation with the financial sector/ private-public partnership	31
7. Financial crime enablers	34
Annex 1. EU-STNA Chapter on Criminal finance and money laundering	37
Annex 2. Proficiency levels	40
Annex 3. Urgency levels	41

List of abbreviations

ARO – Asset Recovery Office

CKC - CEPOL Knowledge Centre

CNU – CEPOL National Unit

EMPACT - European Multidisciplinary Platform Against Criminal Threats

EU – European Union

EU-STNA – European Union Strategic Training Needs Assessment

FIU – Financial Intelligence Units

JHA – Justice and Home Affairs

LE – Law enforcement

MB – Management Board

MS – Member State

OLAF – European Anti-Fraud Office

OTNA – Operational Training Need Analysis

SPD – Single Programming Document

Executive Summary

As defined by the Article 3 of the Regulation 2015/2219, CEPOL shall support, develop, implement and coordinate training for law enforcement officials. The **Operational Training needs Analysis (OTNA) methodology** (as adopted by the Management Board (MB) decision 32/2017/MB (15/11/2017)) establishes a structured training needs analysis procedure taking into account deliverables of the EU Strategic Training needs Assessment (EU-STNA) process.¹ The methodology was piloted in 2018 with limited number of thematic priorities for CEPOL training portfolio planning 2019, namely CSDP Missions and Counter-terrorism. Building on the strategic training priorities defined by the EU-STNA and the experience gained from previous OTNA studies CEPOL launched the OTNA on Criminal Finance, money laundering and asset recovery in 2019. Outcomes of the research will be used to define CEPOL's training portfolio in Criminal Finance, money laundering and asset recovery for 2021.

This report describes training priorities in the area of Criminal finance, money laundering and asset recovery for 2021 based on the analysis of the data received from law enforcement agencies and CEPOL National Units (CNU). The main topics and subtopics of training that respondents rated by relevance are stemming from the strategic training priorities defined in the EU-STNA. Training aspects identified in the EU-STNA were discussed, validated and finalised by a focus group of experts on THB comprised of representatives of the respective European Multidisciplinary Platform Against Criminal Threats (EMPACT) group, the European Commission, Justice and Home Affairs (JHA) agencies and CEPOL. The relevant chapter of the EU-STNA Report is available in Annex 1.

In September 2019, CEPOL approached CNUs in 26 Member States² to provide direct contact points in law enforcement agencies (dealing with the subject of the OTNA) of their respective countries. A total of 20 MSs and Europol responded to this initiative by nominating altogether 54 experts. The questionnaire was sent to these nominated contact points, to JHA agencies in January 2020 and EUROPOL forwarded the questionnaire to all the European Financial Intelligence Units (FIUs). This resulted in 50 completed answers from different LE agencies from 25 Member States³ and from Europol, representing 73 076 law enforcement officials and indicating 93% response rate among Members States.

The **most relevant main topic** for law enforcement training in this area is related to *Prevention of money laundering* (93% of MSs found it relevant) followed by *Financial intelligence analysis investigations* (89%), *together with International cooperation* (81%), *Financial investigations* (81%) and *Tracing and recovery of proceeds from crime* (81%). *Cooperation with the financial sector/ private-public partnership* (74%) and *Financial crime enablers* (63%) are still relevant topics, while *Document and identity fraud* (44%) is considered the least relevant subject in terms of training by responding Members States (Table 1.).

¹ European Union Strategic Training Needs Assessment aims at identifying those EU level training priorities in the area of internal security and its external aspects to help build the capacity of law enforcement officials, while seeking to avoid duplication of efforts and achieve better coordination.

² The terminology 'Member States' hereinafter refers to 26 Member States of the European Union participating in CEPOL regulation and Denmark. Denmark was approached via its Financial Intelligence Unit.

³ Responding countries: Austria, Belgium, Denmark, Estonia, Germany, Hungary, Italy, Latvia, Malta, Portugal, Slovakia, Sweden, Netherlands, Croatia, Cyprus, Czech Republic, Finland, France, Greece, Lithuania, Netherlands, Poland, Romania, Slovenia, Spain.

The distribution of training needs depending on the indicated relevance rate is as follows:

Table 1. Relevance rate of main topics

Main Topic	Relevance
Prevention of money laundering	93%
Financial intelligence analysis investigations	89%
Tracing and recovery of proceeds from crime	81%
International cooperation	81%
Financial investigations	81%
Cooperation with the financial sector/ private-public partnership	74%
Financial crime enablers	63%
Document and identity fraud	44%

As per methodology, training topics that where more than 50% of MS indicate that relevant training needs are to be considered for further analysis in terms of their content, urgency, proficiency level and number of participants.

All training needs are moderately urgent, the average urgency rate is 64% meaning that it would be advantageous to receive training within a year or earlier; it would improve performance, however, not significantly.⁴ The highest urgency rates is 68% for the topic of *Financial investigations*, closely followed by *Tracing and recovery of proceeds from crime*. Training can be delivered in (predictable) 2-3 years' time; knowledge needs to stay updated in case of *Prevention of money laundering* (45%).

The distribution of more relevant training needs depending on the indicated urgency rate is as follows:

Table 2. Relevance and urgency rate of main topics

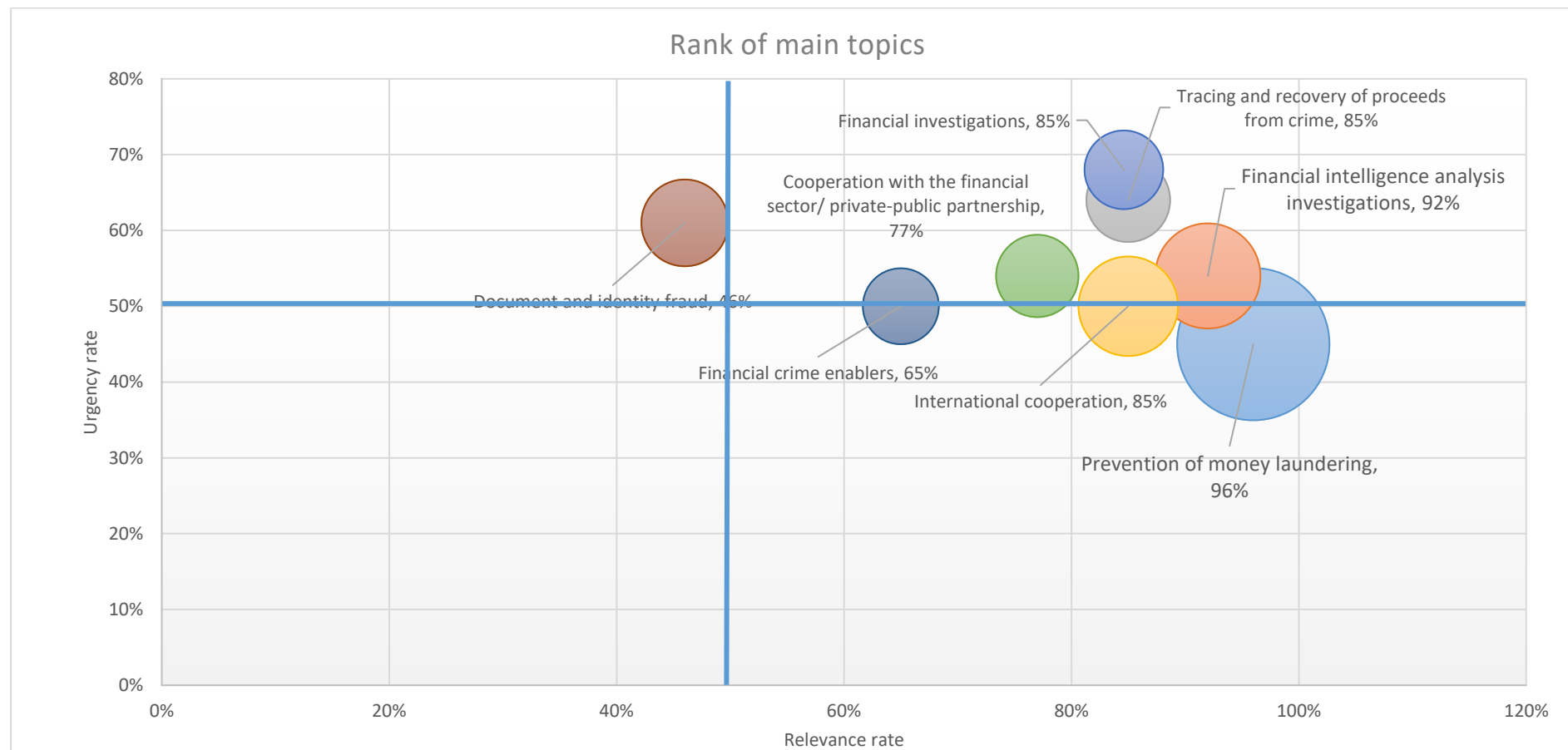
Main Topic	Relevance	Urgency rate
Prevention of money laundering	93%	45%
Financial intelligence analysis investigations	89%	54%
Tracing and recovery of proceeds from crime	81%	64%
International cooperation	81%	50%
Financial investigations	81%	68%
Cooperation with the financial sector/ private-public partnership	74%	54%
Financial crime enablers	63%	50%

The Eisenhower decision method was applied to demonstrate the distribution of main topics by urgency and relevance rate. The Eisenhower Decision Principle evaluates tasks using the criteria important/unimportant and urgent/not urgent and places in according quadrants in an Eisenhower Matrix. The order of implementation of tasks should be 1. Important/Urgent 2. Important/Not Urgent 3. Unimportant/Urgent 4. Unimportant/Not Urgent. Chart 1. displays main topics according to this logic giving a clear overview of priorities for training design.

⁴ See explanation of Urgency levels in Annex 3.

Chart 1. Relevance and urgency rate of main topics

Size of the bubble indicates number of trainees indicated by respondents.⁵



⁵ Number of trainees requiring awareness, practitioner, advanced practitioner, expert and train-the-trainer level training.

With the aim of better understanding training needs of law enforcement (LE) officials, various **subtopics** were presented for the assessment of respondents under each topic. Training should put emphasis on *Off shore companies and structures (financial investigations)*, *New payment methods* (Tracing and recovery of proceeds from crime) and *e-Money laundering (virtual currencies, cryptocurrency)* and *darkweb (Cooperation with the financial sector/ private-public partnership)*.

Table 3. Relevance rate of most relevant subtopics from all main topics

Main topics	Subtopics	Average
Prevention of money laundering	Off shore companies and structures	78%
Financial intelligence analysis investigations	New payment methods (cryptocurrency, virtual currency)	77%
Tracing and recovery of proceeds from crime	e-Money laundering (virtual currencies, cryptocurrency) and darkweb	77%
International cooperation	Cash movement and cash collection networks (money mules, super-facilitators, terminology)	75%
Financial investigations	Terrorism financing indicators and differences	70%
Cooperation with the financial sector/ private-public partnership	Informal value transfer systems/alternative banking services (hawala and similar)	68%
Financial crime enablers	Trade based money laundering (gold and precious metals as means of money laundering)	67%
Document and identity fraud	Structure, power, role and practice of FIUs	57%

Respondents indicated that **7 699 participants would need training in 2021 from the 25 responding Member States and Europol, which means 34 320 potential trainees from 27 MSs of the European Union⁶.**

CEPOL's training addresses law enforcement officials of 27 EU Member States in this case. Number of participants indicated in the responses to the survey are considered as the number of participants who would need training from answering Member States. The estimate total number of LE officials who would need training in a certain topic in a certain proficiency level is calculated via identifying the central tendency or middle value (statistical median) ⁷of the number of trainees per topic per

⁶ Median of number of indicated participants was calculated in order to be able to calculate the potential number of attendees should 27 MS be interested in training.

⁷ The median is a simple measure of central tendency, the 'middle value' of the list. The basic advantage of the median in describing data compared to the mean (often simply described as the "average") is that it is not skewed so much by extremely large or small values, and so it may give a better idea of a 'typical' value. For example, in understanding statistics like household income or assets which vary greatly, a mean (average) may be skewed by a small number of extremely high or low values. Median income, for example, may be a better way to suggest what a 'typical' income is (<https://en.wikipedia.org/wiki/Median>).

proficiency level. The estimate of number of participants on EU-level is calculated by multiplying the median with 27. Since the median excludes the extremes of the data set, it might happen that the rank of proficiency levels in a given topic is different on the EU level to the rank which is based on the responses given to the survey.

The highest need is indicated by respondents in the proficiency levels of **expert** and **advanced practitioners**, while awareness level training is lower on the priority scale (Table 4.). Please find the details of training dimensions in the Analysis section of this report.

Table 4. Proficiency levels and number of participants

Proficiency level	Number of participants	Extrapolation to 27 MS
Awareness	1 231	8 735
Practitioner	1 900	11 083,5
Advanced practitioner	1 839	9 342,5
Expert	1 526	6 547,5
Train-the-trainer	1 203	10 077,5
Total	7 699	45 786

This year, the standard OTNA questionnaire was complemented with an additional question to identify the profiles of LE officials who would need training in different topics. Most mentions were given to investigators, analysts and managers; these are the target groups that should be training first. Lower priority was indicated for trainers and researchers.

Data on training provided on national level is scattered and not apt for drawing statistics. The general trend demonstrates that training of law enforcement officials in Criminal finance, money laundering and asset recovery mostly happens face-to-face in Member States. The principal target groups of training are analysts and investigators. Besides this, Croatia trains police officers, prosecutors and judges. Proficiency level of training varies with more focus on practitioner and advanced practitioner levels. Most frequently, trainings aim at developing knowledge, skills and competencies on prevention of money laundering. Financial investigations and awareness raising are also important subjects of training on national level.

SUMMARY

The outcomes of the Operational Training Needs Analysis on Criminal finance, money laundering and asset recovery show that most of the main topics are highly relevant and moderately urgent for law enforcement officials. *Financial investigation* and *Tracing and recovery of proceeds from crime* should be given highest priority when designing training activities closely followed by *Financial intelligence analysis investigations*. Among subtopics, LE officials need to improve their knowledge on *Off shore companies and structures* (financial investigations), *New payment methods* (Tracing and recovery of proceeds from crime) and *e-Money laundering* (virtual currencies, cryptocurrency) and darkweb (Cooperation with the financial sector/ private-public partnership). Furthermore, **as identified in the EU-STNA**, investigation methods and techniques including undercover operations, intelligence collection and analysis, etc. as well as new technologies including cyber-investigation. Training on the *Tracing and recovery of proceeds of crime* is also mentioned here. Further important issues are *Trade-based money laundering*, *Modi operandi*, *Crime enablers*, *hawala* and *new online payment methods*. International cooperation is considered a must, and in particular, the use of Joint Investigation Teams (JITs) and the knowledge of the type of support EU agencies can offer. On the level of prevention of money laundering, the sharing of good practice could be effective. Each of them **should be topics**

covered in each training activity on Criminal Finance, money laundering and asset recovery. Training should be provided to investigators, analyst and managers in the first place.

Background

As defined by the Article 3 of the Regulation 2015/2219, CEPOL shall support, develop, implement and coordinate training for law enforcement officials, while putting particular emphasis on the protection of human rights and fundamental freedoms in the context of law enforcement, in particular in the areas of prevention of and fight against serious crime affecting two or more Member States and terrorism, maintenance of public order, international policing of major events, and planning and command of Union missions, which may also include training on law enforcement leadership and language skills.

The SPD 2019-2021 describes Operational Training Needs Analysis (OTNA) as a process to help to the realization of strategic goals through the implementation of operational training activities.

The OTNA methodology (as adopted by the MB decision 32/2017/MB (15/11/2017)) was piloted in 2018 with limited number of thematic priorities for CEPOL training portfolio planning 2019, namely CSDP Missions and Counter-terrorism.

The methodology consists of a series of 7 steps encompassing close and dynamic cooperation with the MS, in particular the CEPOL National Units, and LE agencies, and involving CEPOL Knowledge Centres (CKC) in the design of training portfolio. The overall OTNA process entails data collection and analysis, conducted via and corroborated by introductory surveys, detailed questionnaires and expert interviews. The target group referred to in this methodology is law enforcement officials, as defined in Article 2 of Regulation 2015/2219⁸.

In the course of October 2019, CEPOL National Units provided contact points to law enforcement agencies in their respective countries through filling out an introductory survey. In November 2019 an expert group of representatives of the European Commission, respective EMPACT group, JHA agencies and CEPOL discussed the strategic training priorities identified by the EU-STNA in the topic of Criminal finance, money laundering and asset recovery and finalised the list of main topics and subtopics to be addressed in the survey. The training needs surveys were launched in January 2020 and were completed by February 2020. Analysis was carried out in February and March 2020. The OTNA report will be validated by the same expert group, which will design CEPOL training portfolio for 2021 in the topic of Criminal finance, money laundering and asset recovery.

Analysis

Consolidation of data

Data was processed from Limesurvey to Microsoft Excel. Only full responses were taken on board for analysis.

Response rate

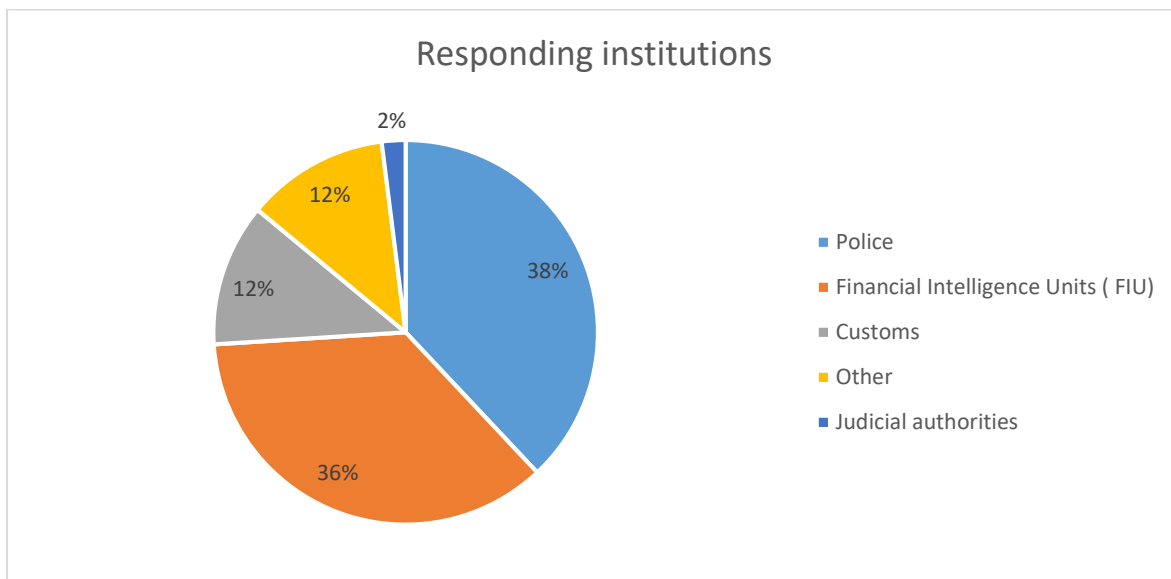
CEPOL approached 26 Member States⁹ to provide contact points in law enforcement agencies of their respective countries. The questionnaire was sent to contact points (law enforcement agencies

⁸ <https://publications.europa.eu/en/publication-detail/-/publication/c71d1eb2-9a55-11e5-b3b7-01aa75ed71a1/language-en>.

⁹ The terminology 'Member States' refers to 26 Member States of the European Union participating in the CEPOL Regulation.

involved in the area of the OTNA and CEPOL National Units) in 27 Member States¹⁰ of the European Union and to JHA agencies. EUROPOL forwarded the questionnaire to all the European FIUs. This resulted in 50 completed answers from different LE agencies from 25 Member States¹¹ and from Europol. This indicates that **93% of Member States** representing **73 076 law enforcement officials**¹² **across Europe** expressed their training needs in the field of Criminal Finance, money laundering and asset recovery. Most of responses (46%) represented Police followed by Financial intelligence Units (36%).

Chart 2. Distribution of responding institutions



Relevance of main topics

Potential training needs were presented based on the outcomes of expert group discussion held in November 2019 in line with the training priorities defined in the EU-STNA process. Respondents were asked whether they find a main topic arising from the EU-STNA outcomes relevant for the performance of the LE service. Main training topics in relation to Criminal Finance, money laundering and asset recovery are as follows:

<i>Financial investigations</i>
<i>Tracing and recovery of proceeds from crime</i>
<i>Financial intelligence analysis investigations</i>
<i>Prevention of money laundering</i>
<i>International cooperation</i>
<i>Cooperation with the financial sector/ private-public partnership</i>
<i>Financial crime enablers</i>

¹⁰ In addition to the 26 Member States stipulated in CEPOL's mandate, the Financial Intelligence Unit of Denmark provided answer to the questionnaire.

¹¹ Responding countries: Austria, Belgium, Denmark, Estonia, Germany, Hungary, Italy, Latvia, Malta, Portugal, Slovakia, Sweden, Netherlands, Croatia, Cyprus, Czech Republic, Finland, France, Greece, Lithuania, Netherlands, Poland, Romania, Slovenia, and Spain.

¹² Number of officials, as indicated by the respondents, performing their duties in the area related to Criminal Finance.

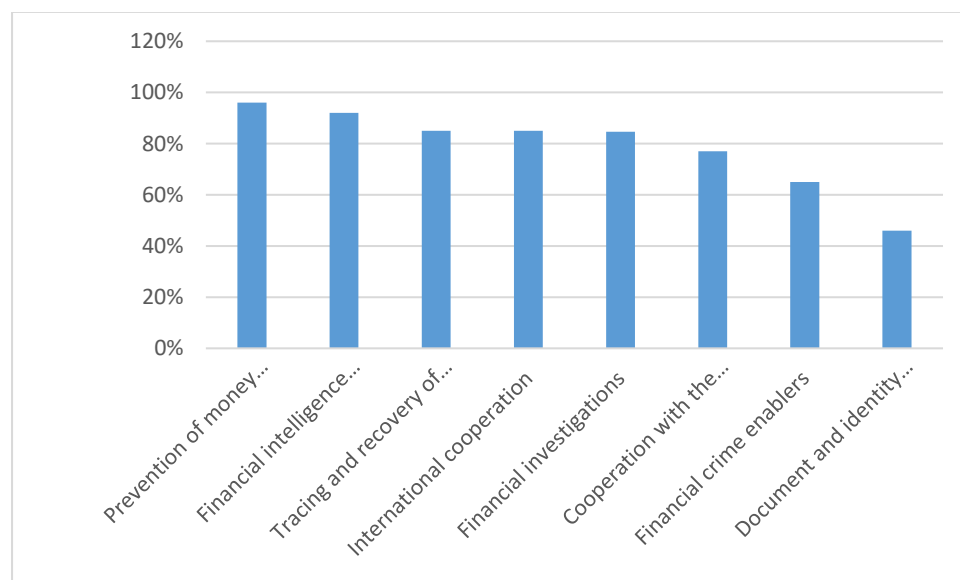
<i>Document and identity fraud</i>

The final relevance rate of a given main topic was calculated by summing up how many Member States found each topic relevant. Where several LE agencies submitted identical answers from the same MS entries were consolidated. The ratio of relevance was calculated by dividing the sum of MSs that found the topic relevant by the number of responding MSs. If more than 50% of MSs find a certain topic relevant, it is considered relevant and it will be processed for further analysis as per OTNA methodology. Seven of all main topics passed the 50% threshold of relevance rate, having the *Document and identity fraud* topic with 46% relevance and will not be processed for further analysis.

Table 5. Relevance rate of main topics

Main topics	Relevance
Prevention of money laundering	93%
Financial intelligence analysis investigations	89%
Tracing and recovery of proceeds from crime	81%
International cooperation	81%
Financial investigations	81%
Cooperation with the financial sector/ private-public partnership	74%
Financial crime enablers	63%
Document and identity fraud	44%

Chart 3. Relevance rate of main topics



Training dimensions

Respondents were asked to indicate the proficiency level of training needed under each main topic. The levels of proficiency were the following: Awareness, Practitioner, Advanced practitioner, Expert and Train-the-trainer. (Please find detailed description of proficiency levels in Annex 2.) Each proficiency level under each main topic has related data such as urgency level and the number of requested participants per profile.

Where the same proficiency level was indicated by several LE agencies of the same MS the attributes of the training were calculated as follows. For urgency level, the highest rate indicated was taken into consideration and for number of participants the sum of the indicated numbers.

The Likert-type scale of urgency levels (Training need is low –not urgent at all, Training need is secondary – not urgent, Training need is moderate – somewhat urgent, Training need is urgent, Training need is crucial – very urgent) was converted into numerical scale from 1-5, five meaning Training need is crucial – very urgent. The highest urgency score under each proficiency level was taken into account. Please find the detailed description of urgency levels in Annex 3.

Number of participants was calculated as the sum of the participants indicated by each MS. Median of number of participants was calculated in order to be able to calculate the potential number of attendees should all MS take part in the training. As several LE agencies could not estimate the number of potential participants, there might be further interest in a certain training than indicated under the total number of participants.

Respondents indicated that **7 799 participants would need training in 2021 from the 25 responding Member States and Europol which means 45 786 potential trainees from 27 MSs of the European Union¹³**. The highest need that is indicated by respondents is in the proficiency levels of **practitioner and awareness**, while expert level training is lower on the priority scale (Table 6.).

Please find the details of training dimensions in the Analysis section of this report.

Table 6. Proficiency levels and number of participants

Proficiency level	Number of participants	Extrapolation to 27 MS
Awareness	1 231	8 35
Practitioner	1 900	11 083,5
Advanced practitioner	1 839	9 342,5
Expert	1 626	6 547,5
Train-the-trainer	1 203	10 077,5
Total	7 799	45 786

The questionnaire this year offered the possibility of indicating the profiles of law enforcement officials who need training under each main category. This allows assessing the training need in terms of number of participants who need training per profile and per proficiency level providing a more detailed picture on target groups to be trained. Respondents could indicate profiles of LE officials as free text. During the analyses, profiles were unified and number of entries for each profile were summed up. See Table 7. for details.

¹³ Median of number of indicated participants was calculated in order to be able to calculate the potential number of attendees should 26 MS be interested in training.

Table 7. Counts of profiles per main category

	Financial investigations	Tracing and recovery of proceeds from crime	Cooperation with the financial sector/ private-public partnership	International cooperation	Financial crime enablers	Financial intelligence analysis investigations	Document and identity fraud	Prevention of money laundering	Total
Analyst	39	24	27	28	13	25	10	19	185
Manager	29	20	13	21	7	12	9	15	126
Investigator	31	19	8	19	13	12	7	16	125
Police officer	8	1	3	1	3	5	1	4	26
Trainer	1	2	0	0	1	1	1	2	8
Researcher	1	1	0	1	1	1	0	1	6
Senior management supervisor	0	0	1	1	1	1	1	1	6
Asset recovery experts	0	3	0	0	0	0	0	2	5
First line supervisor	0	0	1	1	1	1	0	1	5
Representatives from national FIU and ARO offices	1	1	0	1	1	0	0	0	4
Mid management level supervisor	0	0	0	0	1	1	1	1	4
Lawyer	1	0	0	0	0	0	0	2	3
Heads of small units and sub-units	0	0	0	1	0	1	0	1	3
Head of units	0	0	0	0	1	1	0	1	3
Detective	0	1	0	0	0	1	0	0	2
Supervision and enforcement associates	0	0	1	1	0	0	0	0	2
Administrative	1	0	0	0	0	0	0	0	1
Financial intelligence experts relation managers	0	0	1	0	0	0	0	0	1
Legal officers	0	0	1	0	0	0	0	0	1
Office assistant	0	0	1	0	0	0	0	0	1
Organized crime investigation unit officers (analysts and investigators)	0	0	1	0	0	0	0	0	1

Identification of subtopics

With the aim of better understanding training needs, various subtopics were presented for assessment under each topic.

Respondents could rate the relevance of each subtopic on the following scale: Not relevant at all – Somewhat relevant – Relevant – Very relevant – Extremely relevant. This scale was converted into a numerical scale 0-1-2-3-4. The minimum value is 0 because 'not relevant at all' means zero relevance. The relevance score of each subtopic was calculated by drawing the sum of the responses. Where several LE services gave answers from the same country the average given by LE services for each subtopic was calculated and used as the relevance level indicated by that particular country. If the relevance score (i.e. the sum of scores given by each country) reached 50% of the maximum score (4*X, i.e. Extremely relevant multiplied by the number of responding MSs that found that particular main topic relevant), the subtopic was found relevant.

For the first main topic, *Financial investigation*, the survey demonstrated that training should put emphasis on *Off shore companies and structures, e-Money laundering (virtual currencies, cryptocurrency) and darkweb, Cash movement and cash collection networks (money mules, super-facilitators, terminology) and Terrorism financing indicators and differences. Informal value transfer systems/alternative banking services (hawala and similar) and Trade based money laundering (gold and precious metals as means of money laundering)* are important, but not crucial aspects of training. Respondents gave less priority to Structure, power, role and practice of FIUs.

Table 8. Relevance rate of subtopics for Financial investigation

Subtopics	Average
Off shore companies and structures	78%
e-Money laundering (virtual currencies, cryptocurrency) and darkweb	77%
Cash movement and cash collection networks (money mules, super-facilitators, terminology)	75%
Terrorism financing indicators and differences	70%
Informal value transfer systems/alternative banking services(hawala and similar)	68%
Trade based money laundering(gold and precious metals as means of money laundering)	67%
Structure, power, role and practice of FIUs	57%

For the second main topic, most relevant subtopic is New payment methods (cryptocurrency, virtual currency) and also, responders show importance for International cooperation (ARO-CARIN, AMON) and National asset tracing and recovery practices.

Table 9. Relevance rate of subtopics for Tracing and recovery of proceeds from crime

Subtopics	Average
New payment methods (cryptocurrency, virtual currency)	77%
International cooperation (ARO-CARIN, AMON)	66%
National asset tracing and recovery practices	63%

For the *Cooperation with the financial sector/private-public partnership* a relevant subtopic for further training is *Developing strands of intelligence on strategic level* (closer work with the FIU).

Table 10. Relevance rate of subtopics for Cooperation with the financial sector/ private-public partnership

Subtopics	Average
Developing strands of intelligence on strategic level (closer work with the FIU)	70%
Developing strands of intelligence on operational level (money laundering investigation)	67%
Collaborative exchange against cross-border trends	63%
Joint projects/investigations with private sector	54%

A relevant subtopic is *Cooperation with non-EU countries*, mentioned for the *International cooperation* main topic.

Table 11. Relevance rate of subtopics for International cooperation

Subtopics	Average
Cooperation with non-EU countries	61%
Informal networks (ARO-CARIN, AMON)	59%
International mutual legal assistance	57%
Role of EU agencies (EUROPOL, EUROJUST, OLAF, FRONTEX)	57%

Further training should include *Best practices in term of identification and investigation* in the *Financial crime enablers* main topic.

Table 12. Relevance rate of subtopics for Financial crime enablers

Subtopics	Average
Best practices in terms of identification and investigation	68%
Modus operandi/ different typologies	60%
Private/ public sector cooperation (representative bodies, regulators)	58%

The relevance of subtopics for *Financial intelligence analysis investigations*, is higher for *Analysis of Intelligence*, closely followed by *Trends and new developments* and *OSINT*.

Table 13. Relevance rate of subtopics for Financial intelligence analysis investigations

Subtopics	Average
Analysis of intelligence	79%
Trends and new developments	74%
OSINT	74%
Sources and collection of intelligence (e.g. Cash transaction reports)	73%
Effective use of investigative tools	71%
Joint investigation teams	65%
Task force, inter-agency cooperation at national level	61%

Both *Joint projects/investigations with private sector* and *collaborative exchange against cross-border trends* have medium relevance for *Document and identity fraud*.

Table 14. Relevance rate of subtopics for Document and identity fraud

Subtopics	Average
Joint projects/investigations with private sector	64%
Collaborative exchange against cross-border trends	63%

The respondents found relevant the *Awareness-raising campaigns to law enforcement, the judiciary* subtopic for *Prevention of money laundering main topic*.

Table 15. Relevance rate of subtopics for Prevention of money laundering

Subtopics	Average
Awareness-raising campaigns to law enforcement, the judiciary	61%
Risk prevention through cooperation with private sector	59%

National level training

Reports on training provided on national level for law enforcement officials are hardly available, therefore this year the questionnaire had a section with questions referring to data on training available in Member States. Questions focused on the form, target group, proficiency level and aim of training as well as the number of participants trained on national level. We received answers from 24 countries with the remark that the data might not be precise. Therefore, data on training provided on national level is scattered and not apt for drawing statistics. However, we can still draw a general trend based on the answers received. It demonstrates that training of law enforcement officials in Criminal finance, money laundering and asset recovery mostly happens residentially in Members States. The awareness level is practitioner and the principal targets groups of training are analyst and criminal finance investigators. Besides these, Romania trains DLAF officers, Czech Republic provides training to managers and Hungary to prosecutors and judges also. Most frequently, trainings aim at developing knowledge, skills and competencies on analysing financial data. Financial investigations and awareness rising are also important subjects of training on national level. See Table 16. for details.

Table 16. Training available on national level

Topic	Number of participants	Form	Proficiency level	Target group	Aim
Financial investigations	984	Residential	Practitioner and advanced practitioner	Mainly analyst and police officers. in Romania also DLAF operational staff	To enhance use of financial intelligence and to support criminal investigation concerning economic crimes taking into consideration the cooperation between investigation and corporate audit
Tracing and recovery of proceeds from crime	407	Residential/Seminar	Mainly practitioner and expert	Mainly police officers dealing with criminal finance and investigators. In Hungary also prosecutors and judges. In France Criminal assets cells agents	Awareness raising and to enhance and secure seizures
Cooperation with the financial sector/ private-public partnership	143	Residential	Mainly advanced practitioner and expert	Analysts, in Czech Republic also managers	Basic knowledge
International cooperation	597	Residential/Seminar	Mainly practitioner and expert	Analysts and investigators	Knowhow and specific operational problems during the execution of judicial police investigations and administrative checks
Financial crime enablers	188	Residential	Mainly advanced practitioner and expert	Investigators and FIU analysts in Belgium	Knowhow and awareness
Financial intelligence analysis investigations	606	Residential/International	Mainly practitioner and advanced practitioner	Investigators and analysts	To collect, evaluate, collate, and analyse financial data and transactions efficiently
Document and identity fraud	130	Residential	Mainly advanced practitioner and expert	Law enforcement	To enhance the use of financial information in administrative investigations related to EU's budget frauds
Prevention of money laundering	541	Residential/Seminar	Mainly advanced practitioner and expert	Intelligence officers and investigators	Financial investigations, standardize property research practices, awareness about new kind of mailbox companies.
Total	3596				

Training dimensions for main topics

Each main topic was analysed in terms of level of proficiency. Levels of proficiency are: Awareness, Practitioner, Advanced practitioner, Expert and Train-the-trainer. For each level of proficiency respondents indicated the potential number of participants per profile.

With the aim of better understanding training needs various subtopics were presented for assessment under each topic. Respondents could rate the relevance of each subtopic on the following scale: Not relevant at all – Somewhat relevant – Relevant –Very relevant – Extremely relevant. This scale was converted into a numerical scale 0-1-2-3-4. The minimum value is 0 because ‘not relevant at all’ means zero relevance. The relevance score of each subtopic was calculated by drawing the sum of the responses. Where several LE services gave answers from the same country the average given by LE services for each subtopic was calculated and used as the relevance level indicated by that particular country. In case the relevance score (i.e. the sum of scores given by each country) reaches 50% of the maximum score ($4 \times X$, i.e. Extremely relevant multiplied by the number of responding MSs that found that particular main topic relevant), the subtopic is found relevant.

This chapter presents detailed training needs related to each main topic. After a summary of training needs, the first table of each main topic shows the relevance rate of subtopics in descending order.

The second table demonstrates the number of participants who need training in different proficiency levels and different profiles and the urgency level of training to be delivered. The median of number of participants was calculated in order to be able to assess how many potential participants can be expected at a certain proficiency level from the 27 Member States that fall in the scope of this analysis. The column titled ‘Extrapolation for all MSs’ contains the potential number of participants from 26 Member States that fall in the scope of CEPOL regulation.

The third table shows the profiles of law enforcement officials who need training in the given main topic and the entries of respondents for each profile.

The fourth table summarises the number of officials who need training per profile.

The last table is a summary of answers on training available on national level.

1. Prevention of money laundering

Prevention of money laundering is the most relevant main topic as indicated by 25 Member States and Europol. Within this main topic, training should focus on awareness-raising campaigns to law enforcement, the judiciary. Further on, Risk prevention through cooperation with private sector was mentioned as additional training need. Training need is not urgent -training can be delivered within 3 years. Respondents signalled training need for 763 LE officials which would mean 3 780 officials to be trained across Europe. Respondents indicated 15 profiles of LE officials, out of which investigators, analyst and managers should be the primary target groups of training. On national level, mainly intelligence officers and investigators are trained on advanced practitioner and expert level in the form of residential courses with focus Financial investigations, standardize property research practices and awareness about new kind of mailbox companies.

Relevance rate of subtopics in descending order

Subtopics	Average
Awareness-raising campaigns to law enforcement, the judiciary	61%
Risk prevention through cooperation with private sector	59%

Urgency and number of participants by proficiency level

	Urgency	Number of participants	Extrapolated to EU
Awareness	37%	162	783
Practitioner	44%	175	904.5
Advanced practitioner	49%	157	958.5
Expert	53%	129	405
Train-the-trainer	43%	140	729
Average/Total	45%	1 526	3 780

Count of profiles indicated

Analyst	19
Investigator	16
Manager	15
Financial crime specialist	2
International and national asset recovery experts	2
Lawyer	2
Trainer	2
Economics, Business Order and Financial System Crime investigators and analysts	1
First line supervisor	1
Heads of small units and sub-units (coordinators of field investigators)	1
Heads of units and complex sub-units	1
Mid management level supervisor	1
Police officer for economic crime and corruption	1
Researcher	1
Senior management	1
Number of profiles	15

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	TOTAL
Investigator	80	64	62	47	51	304
Analyst	33	38	49	35	33	188
First line supervisor	15	15	15	15	20	80
Manager	18	12	12	12	11	65

Mid management level supervisor	10	10	10	10	15	55
Financial crime specialist	0	30	0	0	0	30
Senior management	5	5	5	5	10	30
Heads of small units and sub-units (coordinators of field investigators)	0	0	3	0	0	3
Heads of units and complex sub-units	0	0	0	3	0	3
trainer	1	1	1	0	0	3
International and national asset recovery experts	0	0	0	1	0	1
Lawyer				1		1
Total	162	175	157	129	140	763
Extrapolated to EU	754	767	468	221	403	2 613

National level training

Form	Residential
Number of officials trained	541
Proficiency level	Mainly advanced practitioner and expert
Target group	Intelligence officers and investigators
Aim	Financial investigations, standardize property research practices, awareness about new kind of mailbox companies.

2. Financial intelligence analysis investigations

Financial intelligence analysis investigations is the second most relevant main topic as indicated by 24 Member States. Within this main topic, training should focus on analysis of intelligence, trends and new developments and should include elements on OSINT. Sources and collection of intelligence (e.g. cash transaction reports), effective use of investigative tools, as well as Joint Investigation Teams and Task force, inter-agency cooperation at national level were mentioned as additional training needs. Training need is moderately urgent. Respondents signalled training need for 688 LE officials which would mean 5 266 officials to be trained across Europe. Respondents indicated 13 profiles of LE officials, out of which investigators, analyst and managers should be the primary target groups of training. On national level, mainly intelligence officers and analysts are trained on practitioner and advanced practitioner proficiency levels, in the form of residential courses and seminars with focus on victim and suspect identification in most countries.

Relevance rate of subtopics in descending order

Analysis of intelligence	79%
Trends and new developments	74%

OSINT	74%
Sources and collection of intelligence (e.g. Cash transaction reports)	73%
Effective use of investigative tools	71%
Joint investigation teams	65%
Task force, inter-agency cooperation at national level	61%

Urgency and number of participants by proficiency level

	Urgency	Number of participants	Extrapolated to EU
Awareness	39%	98	1 026
Practitioner	53%	156	1 215
Advanced practitioner	63%	129	1 148
Expert	65%	185	621
Train-the-trainer	50%	120	1 256
Average/Total	54%	688	5 266

Count of profiles indicated

Analyst	25
Investigator	12
Manager	12
Financial expert	4
Detective	1
Economics, Business Order and Financial System Crime analysts and investigators	1
First line supervisor	1
Heads of small units and sub-units (coordinators of field investigators)	1
Heads of units and complex sub-units	1
Mid management level supervisor	1
Researcher	1
Senior management	1
Trainer	1
Number of profiles	13

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Analyst	25	38	31	99	41	234
Investigator	36	45	62	37	31	211
First line supervisor	15	15	15	15	20	80
Mid management level supervisor	10	10	10	10	15	55
Financial expert	0	30	0	4	0	34
Manager	6	12	1	9	3	31
Senior management	5	5	5	5	10	30
Heads of small units and sub-units (coordinators of field investigators)	0	0	4	0	0	4
Heads of units and complex sub-units	0	0	0	4	0	4
Trainer	1	1	1		0	3
Detective				2		2
Total	98	156	129	185	120	688
Extrapolated to EU	988	1 066	520	377	910	3 861

National level training

Number of participants	606
Form	Residential/International
Proficiency level	Practitioner and advanced practitioner
Target group	Analysts and investigators
Aim	To collect, evaluate, collate, and analyse financial data and transactions efficiently

3. Tracing and recovery of proceeds from crime

Tracing and recovery of proceeds from crime is the third relevant main topic as indicated by 22 Member States. Within this main topic, training should focus on new payment methods (cryptocurrency, virtual currency) and include elements international cooperation (ARO-CARIN, AMON) and National asset tracing and recovery practices. Training need is moderately urgent. Respondents signalled training needs for 1 113 LE officials which would mean 5 616,5 officials to be trained across Europe. Respondents indicated 9 profiles of LE officials, out of which analysts, managers and investigators should be the primary target groups of training. On national level, mainly investigators and criminal finance police officers are trained on practitioner and expert level in the form of residential courses with focus on awareness-raising, and to enhance and secure seizures in most countries.

Relevance rate of subtopics in descending order

New payment methods (cryptocurrency, virtual currency)	77%
International cooperation (ARO-CARIN, AMON)	66%
National asset tracing and recovery practices	63%

Urgency and number of participants by proficiency level

	Urgency	Total	Extrapolated to EU
Awareness	48%	184	1 283
Practitioner	61%	302	1 485
Advanced practitioner	73%	268	945
Expert	77%	206	850,5
Train-the-trainer	59%	153	1053
Average/Total	64%	1 113	5 616,5

Count of profiles indicated

Analyst	24
Manager	20
Investigator	19
Asset recovery experts	3
Trainer	2
Detective	1
Police officer for economic crime and corruption	1

Representatives from national FIU and ARO offices	1
Researcher	1
Number of profiles	9

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Investigator	78	131	108	84	50	451
Analyst	35	83	63	73	49	303
Manager	48	43	82	39	47	259
Police officer for economic crime and corruption	22	14	14	4	2	56
Asset recovery experts	0	30	0	4	0	34
Detective	0	0	0	2	0	2
Trainer	1	1	1		5	8
Total	184	302	268	206	153	1 113
Extrapolated to EU	1 235	1 300	650	598	715	4 498

National level training

Number of participants	407
Form	Residential
Proficiency level	Mainly practitioner and expert
Target group	Police officers , in Hungary also prosecutors and judges and in France Criminal assets cells agents
Aim	awareness raising and to enhance and secure seizures

4. International cooperation

International cooperation is also a relevant main topic as indicated by 22 Member States. Within this main topic, training should focus on cooperation with non-EU countries followed by informal networks (ARO-CARIN, AMON), international mutual legal assistance and role of EU agencies (EUROPOL, EUROJUST, OLAF, FRONTEX). Training need is moderately urgent. Respondents signalled training

needs for 998 LE officials which would mean 4 887 officials to be trained across Europe. Respondents indicated 12 profiles of LE officials, out of which analysts, managers and investigators should be the primary target groups of training. On national level, mainly analysts and investigators are trained on practitioner and expert level in the form of residential courses and seminars with focus on knowhow and specific operational problems during the execution of judicial police investigations and administrative checks

Relevance rate of subtopics in descending order

Cooperation with non-EU countries	61%
Informal networks (ARO-CARIN, AMON)	59%
International mutual legal assistance	57%
Role of EU agencies (EUROPOL, EUROJUST, OLAF, FRONTEX)	57%

Urgency and number of participants by proficiency level

	Urgency	Total	Extrapolated to EU
Awareness	41%	201	823,5
Practitioner	48%	243	1 444,5
Advanced practitioner	57%	234	877,5
Expert	56%	183	445,5
Train-the-trainer	49%	137	1 296
Average/Total	50%	998	4 887

Count of profiles indicated

Analyst	28
Manager	21
Investigator	19
Researcher	1
Coordinator of FIU & police cooperation	1
First line supervisor	1
Specialist	1
Heads of small units and sub-units (coordinators of field investigators)	1
First line supervisor	1
Organized crime investigation unit officers (analysts and investigators)	1
First line supervisor	1
Senior management	1
Number of profiles	12

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Investigator	94	104	116	91	60	465
Analyst	59	71	47	46	30	253
First line supervisor	15	15	15	15	20	80
Manager	17	7	36	6	2	68
Mid management level supervisor	10	10	10	10	15	55
Senior management	5	5	5	5	10	30
Specialist	0	30	0	0	0	30
Heads of small units and sub-units (coordinators of field investigators)	0	0	4	0	0	4
Heads of Units and complex sub-units	0	0	0	4	0	4
International and national asset recovery experts	0	0	0	4	0	4
Trainer	1	1	1	0	0	3
Detective	0	0	0	2	0	2
Total	201	243	234	183	137	998
Extrapolated to EU	793	1 261	377	208	728	3 367

National level training

Number of participants	597
Form	Residential/Seminar
Proficiency level	Mainly practitioner and expert
Target group	Analysts and Investigators
Aim	Knowhow and specific operational problems during the execution of judicial police investigations and administrative checks

5. Financial investigations

Financial investigations is also a relevant topic as indicated by 22 Member States. Within this main topic, training should focus on off shore companies and structures, e-Money laundering (virtual currencies, cryptocurrency) and include elements on cash movement and cash collection networks (money mules, super-facilitators, terminology), terrorism financing indicators and differences and structure, power, role and practice of FIUs. Training need is moderately urgent. Respondents signalled training need for 2 311 LE officials which would mean 4 893 officials to be trained across Europe. Respondents indicated 10 profiles of LE officials, out of which investigators, analyst and managers should be the primary target groups of training. On national level, analysts and police officers are trained on practitioner and advanced practitioner level in the form of residential courses with focus on enhancing use of financial intelligence and to support criminal investigation concerning economic crimes taking into consideration the cooperation between investigation and corporate audit.

Relevance rate of subtopics in descending order

Off shore companies and structures	78%
e-Money laundering (virtual currencies, cryptocurrency) and darkweb	77%
Cash movement and and cash collection networks (money mules, super-facilitators, terminology)	75%
Terrorism financing indicators and differences	70%
Informal value transfer systems/alternative banking services (hawala or other similar service providers)	68%
Trade based money laundering(gold and precious metals as means of money laundering)	67%
Structure, power, role and practice of FIUs	57%

Urgency and number of participants by proficiency level

	Urgency	Number of participants	Extrapolated to EU
Awareness	48%	272	810
Practitioner	63%	636	1 269
Advanced practitioner	80%	675	1 080
Expert	80%	497	837
Train-the-trainer	69%	231	897
Average/Total	68%	2311	4 893

Count of profiles indicated

Analyst	39
Investigator	31
Manager	29
Police officer for economic crime and corruption	8
Trainer	1
Representatives from national FIU and ARO offices	1
Researcher	1
Administrative	1
Lawyer	1
Representatives from national FIU and ARO offices	1
Number of profiles	10

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Investigator	163	370	296	235	92	1156
Analyst	53	94	152	126	59	484
Manager	36	46	110	110	53	355
Police officer for economic crime and corruption	20	120	110	24	26	300
Researcher	0	5	5	1	1	12
Trainer	0	1	2	0	0	3
Lawyer	0	0	0	1	0	1
Total	272	636	675	497	231	2 311
Extrapolated to EU	780	1 092	650	572	715	3 809

National level training

Number of participants	984
Form	Residential
Proficiency level	Practitioner and advanced practitioner
Target group	Analysts and Police Officers
Aim	To enhance use of financial intelligence and to support criminal investigation concerning economic crimes taking into consideration the cooperation between investigation and corporate audit

6. Cooperation with the financial sector/ private-public partnership

Cooperation with the financial sector/private-public partnership is a mid- relevant main topic in terms of training as indicated by 20 Member States. Within this main topic, training should focus on developing strands of intelligence on strategic level (closer work with the FIU), developing strands of intelligence on operational level (money laundering investigation), and include elements on collaborative exchange against cross-border trends and joint projects/investigations with private sector. Training need is moderately urgent. Respondents signalled training need for 610 LE officials which would mean 5 494,5 officials to be trained across Europe. Respondents indicated 11 profiles of LE officials, out of which investigators, analyst and managers should be the primary target groups of training. On national level, mainly analysts are trained on advanced practitioner and expert level in the form of residential courses with focus on basic knowledge.

Relevance rate of subtopics in descending order

Developing strands of intelligence on strategic level (closer work with the FIU)	70%
Developing strands of intelligence on operational level (money laundering investigation)	67%
Collaborative exchange against cross-border trends	63%
Joint projects/investigations with private sector	54%

Urgency and number of participants by proficiency level

	Urgency	Number of participants	Extrapolated to EU
Awareness	44%	110	1 215
Practitioner	55%	127	1 417,5
Advanced practitioner	60%	151	1 053
Expert	60%	57	661.5
Train-the-trainer	50%	165	1 147,5
Average/Total	54%	610	5 494,5

Count of profiles indicated

Analyst	27
Manager	13
Investigator	8
Officers of the Economic, Business and Financial Crime Units (analysts and investigators)	3
financial intelligence experts Relation managers	1
First line supervisor	1
Senior Management Supervisor	1
Legal Officers	1
Office assistant	1
Organized Crime Investigation Unit Officers (analysts and investigators)	1
Supervision and Enforcement Associates	1
Number of profiles	11

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Analyst	31	42	46	65	47	231
Investigator	33	40	60	33	50	216
Manager	16	10	15	34	28	103
First line supervisor	15	15	15	15	20	80
Supervision and Enforcement Associates	10	15	10	5	10	50
Senior management supervisor	5	5	5	5	10	30
Financial intelligence experts relation managers	0	0	0	0	0	0
Legal officers	0	0	0	0	0	0
TOTAL	110	127	151	157	165	710
Extrapolated to EU	1 170	1 170	676	351	806	4 173

National level training

Number of participants	143
Form	Residential
Proficiency level	Mainly advanced practitioner and expert
Target group	Analysts and Czech Republic managers
Aim	Basic knowledge

7. Financial crime enablers

Cooperation with the financial sector/private-public partnership is a mid- relevant main topic in terms of training as indicated by 20 Member States. Within this main topic, training should focus on developing strands of intelligence on strategic level (closer work with the FIU), developing strands of intelligence on operational level (money laundering investigation), and include elements on collaborative exchange against cross-border trends and joint projects/investigations with private sector. Training need is moderately urgent. Respondents signalled training need for 629 LE officials which would mean 7 654.5 officials to be trained across Europe. Respondents indicated 11 profiles of LE officials, out of which investigators, analyst and managers should be the primary target groups of training. On national level, mainly analysts are trained on advanced practitioner and expert level in the form of residential courses with focus on knowhow and awareness.

Relevance rate of subtopics in descending order

Best practices in terms of identification and investigation	68%
Modus operandi/ different typologies	60%
Private/ public sector cooperation (representative bodies, regulators)	58%

Urgency and number of participants by proficiency level

	Urgency	Number of participants	Extrapolated to EU
Awareness	38%	113	1 323
Practitioner	49%	129	1 525,5
Advanced practitioner	49%	108	1 458
Expert	60%	155	1 539
Train-the-trainer	54%	124	1 809
Average/Total	50%	629	7 654,5

Count of profiles indicated

Analyst	13
Investigator	13
Manager	7
Financial expert	3
Coordinator of FIU & Police cooperation	1
First line supervisor	1
Heads of units and complex sub-units	1
Mid management level supervisor	1
Researcher	1
Senior management	1
Trainer	1
Number of profiles	11

Number of participants per profile and proficiency level

	Awareness	Practitioner	Advanced practitioner	Expert	Train-the-trainer	Total
Investigator	31	38	45	81	40	235
Analyst	45	30	32	37	36	180
First line supervisor	15	15	15	15	20	80
Mid management level supervisor	10	10	10	10	15	55
Financial expert	0	30	0	0	0	30
Senior management	5	5	5	5	10	30
Manager	6	0	0	4	3	13
Heads of units and complex sub-units	0	0	0	3	0	3
Trainer	1	1	1	0	0	3
TOTAL	113	129	108	155	124	629
Extrapolated to EU	1 274	1 378	975	988	1 443	6 058

National level training

Number of participants	188
Form	Residential
Proficiency level	Mainly practitioner and advanced practitioner
Target group	Investigators and FIU Analysts in Belgium
Aim	Knowhow and raise awareness

Annex 1. EU-STNA Chapter on Criminal finance and money laundering

2.5.1. Environmental challenges

The different judicial systems between EU and non-EU countries create a problem that has a negative effect on investigation and cooperation. Setting up JITs that can include non-EU countries might create possibilities of enhanced collaboration.

In some cases, there is even a lack of a legal framework, mainly due to rapid technology developments, e.g. virtual currencies. In addition, the legislation on crime enablers such as money mules and cash collectors could benefit from harmonisation between EU countries.

Data protection and retention naturally is an important and often problematic issue in this context, it being subject to national legislation. This affects the sharing of information between law enforcement authorities.

2.5.2. Challenges related to knowledge, skills and competences, and related training needs

(a) Challenges

Combating financial crime implies the need for a multidisciplinary approach. Unfortunately, the exchange of information between the different stakeholders, in particular of financial data, is problematic. In addition, the cooperation with non-EU countries is often difficult but highly necessary.

Checking potentially false documents of cash carriers and the authenticity of a company cannot be done fast. Excellent knowledge, including the fact that non-fraudulent documents can contain false data, as well as rapid exchange of information is required to reveal document fraud cases.

As it is inherent in financial crime and money laundering that they are linked with other types of organised crime, cooperation with other investigation units or other types of law enforcement sectors, e.g. customs, is imperative.

(b) Training needs

Summary

The training needs mainly encompass investigation methods and techniques including undercover operations, intelligence collection and analysis, etc. as well as new technologies including cyber-investigation. Training on the tracing and recovery of proceeds of crime is also mentioned here. Further important issues are trade-based money laundering, *modi operandi*, crime enablers, hawala and new online payment methods. International cooperation is considered a must, and in particular the use of JITs and the knowledge of the type of support EU agencies can offer. On the level of prevention of money laundering, the sharing of good practice could be effective.

Further details

In order to improve cooperation between different professional sectors involved, joint multidisciplinary training, including law enforcement, judiciary staff, tax and the banking sector, could help. This, however, might not be sufficient, as, in fact, more exchange of information and of good practice would be required, even involving the enhancement of communication with heads of unit and prosecutors. Joint training would also be beneficial for law enforcement officials investigating other types of crime and prosecutors so they gain a more thorough understanding of financial investigation and asset recovery.

Changes in the types of OCGs and a need for OCG mapping as well as developing an understanding of their cross-border links represent a challenge whilst at the same time their *modi operandi* evolve in line with modern-day technologies. This is particularly valid for different types of fraud, like investment fraud and mass-marketing fraud, where the methods of OCGs are manifold and highly sophisticated and where a high number of countries is involved.

For investigators, there is a need for specialised training on different topics, but also for basic training on new technologies (including evidence gathering) and virtual currencies, involving IT specialists. A train-the-trainers type of activity could help in cascading this type of knowledge more rapidly at national level. The same is valid for training on crime enablers and money-laundering syndicates. The lack of knowledge on money mules can be solved by training.

Generally, the exchange of good practice, tools and trends is considered useful, and in particular for investigative practices and intelligence collection.

CEPOL already provides a series of EU-level training activities on this topic, including financial investigation and asset recovery, money laundering, following the money, alternative banking and payment methods, etc. However, more EU-level training would be needed.





List of identified and prioritised training needs

The following list evidences the prioritisation, as done by Member States, of sub-topics in the area of training against criminal finances and money laundering.

1.	Tracing and recovery of proceeds from crime (freezing and confiscation of criminal assets; international cooperation)
2.	Financial investigations (specialised training for investigators and prosecutors on financial investigations and cryptocurrencies; new technologies; darkweb; virtual currencies; anonymous payment methods; cooperation with private sector)
3.	Joint investigation teams addressing criminal finances (international legal assistance; role of EU agencies; cooperation with non-EU countries; funding possibilities)
4.	Money mules and crime enablers (<i>modi operandi</i> , mutual legal assistance; different typologies; cooperation with private entities; alternative banking, hawala; cooperation with non-EU countries)
5.	Intelligence analysis (trends and new developments; collect, share and exploit relevant data and knowledge)

6.	Document and identity fraud (mainly for first responders, how to detect and identify, best practices; forged non-ID documents (invoices, etc.); investment fraud; financial instruments; cooperation with private sector)
7.	Prevention of money laundering (awareness-raising campaigns to law enforcement, the judiciary, the public and private sectors; identification and sharing of good practices including case studies from investigations and prosecutions, trade-based money laundering; gold and precious metals as means of money laundering)
8.	Undercover operations (recruiting, handling and dealing with informants; intelligence collection and sharing)

Annex 2. 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 require general information in order to be able 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 the extended experience, or specific function, 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. Taking responsibility for his/her contribution 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 about possible situation deviations and can practically apply necessary skills. Can assist in the solution development for abstract problems. Is aware of the boundaries of his/her knowledge and skills, is motivated to develop self-performance.	Has broad and in-depth knowledge, skills and competences involving 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 work of others. Is able to share his/her knowledge with and provide guidance to less experienced colleagues. Is able to debate the issue with a sceptical colleague, countering sophisticated denialist talking points and arguments for inaction.	Has extensive knowledge, skills and competences, is able to link the processes to other competency areas and assess the interface in 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 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.
Visualisation					
EQF equivalent	EQF Level 3-4	EQF Level 5	EQF Level 6	EQF Level 7	n/a

EQF levels – Descriptors defining levels in the European Qualifications Framework, more information is available at <https://ec.europa.eu/ploteus/en/content/descriptors-page>

Images from <https://askfortheworld.wordpress.com/levels/>

Annex 3. Urgency levels

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

Current 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 the performance boost, it would refresh the knowledge, officials could benefit from training, and however, it is not essential.	It would be useful if the training would be delivered, however, 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 is necessary to be delivered within a year's period, it is important to perform qualitatively.	Training is critical, it is necessary as soon as possible, it is crucial for the successful performance of duties.