

# **BAD MONEY**

Dynamic Thinking in AML & CTF

#### TACKLING CRIME HEAD ON

"Organized crime and terrorist groups exploit financial institutions to raise, move, hide and launder their money. Individuals working in companies such as yours can play a crucial part in helping governments defend, deter, disrupt and detain criminals and terrorists"

Chris Jagger, 2creatEffects

# **BAD MONEY: Dynamic Thinking in AML & CTF**

"Two days of thought provoking and practical training which has really helped our team excel".

Chief Compliance Lawyer

#### Introduction

A training course that helps individuals form vigilant and inquiring minds to counter money laundering and terrorist financing in the financial services industry. Bad Money is a new, innovative and dynamic approach built on decades of real-world experience in the field of counter-terrorism and organised crime.

Our aim is to inspire individuals to engage proactively against money laundering and counter terrorist financing.

Bad Money takes a people-centred approach, since its people like you who are the key asset to countering money laundering and terrorist financing. We help individuals and teams build the habits of mind they need to respond to the complex and fast changing environment in which they work.

#### **Workshop Objectives**

- Form an insightful and practical understanding of the importance of your role in supporting law enforcement and intelligence agencies.
- **2.** Develop a dynamic mindset charged with analytical tools and techniques to identify and report suspicious financial activity.
- **3.** Break away from conventional thinking, learn to change the norm and old ways of doing business using positive techniques.
- **4.** Depart feeling inspired, armed, and ready to employ your new skills.

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"I now feel equipped with the knowledge and analytical skills to tackle money laundering"

**Boarding Analyst** 

**Course Overview** 

Day 1

0930-1000: We start off by engaging participants in a short challenge to solve a terrorist financing

mystery. The exercise is carefully led by our experienced facilitators, whom have significant personal

experience investigating organised crime and terrorism, to bring out a series of important issues which

frame the remainder of the training.

1000-1100: Following an examination of the common components of money laundering and terrorist

financing, we discuss the impact failure to identify and report suspicious activity can have on our

business and our society.

**1100-1115:** Break

1115-1230: CASE-STUDIES. Through lively stories, discussion, group work, and Q&A, we explore how

criminal groups operate, and discuss the pros and cons, and examine various strategies for countering

them. 1230-1330: Lunch Break

1330-1500: MIND-SET (Dynamic Thinking). Following discussion and reflection, we then examine how

the brain fails and succeeds in complex environments. Through experiments and mini exercises,

participants experience first-hand how cognitive behaviours can affect our ability to identify

suspicious activity. 1500-1515: Break

1515-1615: MINI SIMULATION. In groups, we practice techniques to overcome challenges, and begin

to build the foundations of a vigilant and inquiring mind.

1615-1645: WRAP UP. In teams, we identify and discuss the all-important "So what for me, my team

and my organisation". Notes are made for short team presentations on day 2.

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Day 2

0930-1000: RE-CAP, PRESENTATION, REFLECTION. Following a short re-cap, each team is invited to

present their findings from the WRAP UP on day one.

1000-1045: TEAM DESIGN: In preparation for the simulation exercise, the facilitator offers advice on

how to organise a team to encourage Dynamic Thinking. 1045-1100: Break

1100-1230: SIMULATION: Having formed an understanding of the theory, experienced the limitations

of the mind in practice, and learned new techniques for thinking dynamically, we then put our new

skills and knowledge to the test in a live simulation exercise; a team effort involving managing and

responding to a complex and fast-moving environment.

The exercise has been designed to allow participants to put the theory and tools and techniques to

practical effect. Your job will be to determine what is happening, identify courses of action, and then

make recommendations. In addition to testing and challenging the attendees Dynamic Thinking skills,

the exercise includes requirements judgment and decision making under pressure, briefings and

presentations, communicating uncertainty, negotiation and persuasion. 1230-1330: Lunch Break

1330-1615: Simulation

1615-1715: Next Steps. A final opportunity to discuss the "So What questions", followed by advice

on how to develop action plans for change, and how to plan for skills and process development in

the future.

"I'm excited to get back to work and put my new skills to use" AML Analyst

## **Course Delivery**

Key messages, take-away ideas, and thinking techniques leading personal behavioural change are established through an engaging, participant focused delivery. A mixture of lectures, case-studies, Q&A, simulations, teamwork and debate is used to ensure learning is achieved in a simulating environment.









### **Course Facilitators**

Our facilitators have a wealth of practical experience in tackling organised and crime and terrorism from both national and international perspectives. Engaging, inspiring and entertaining, they bring a combination of practitioner experience combined with academic vigour.

### **Case Study – Payment Services Bank**

**Requirement**: To educate, train and inspire staff to identify and report suspicious financial activity through the appropriate mechanisms. To build a vigilant security culture.

**Response:** Following a period of research, 2creatEffects designed and delivered a tailored approach to address the stated requirements. The approach included e-learning, classroom learning, consultancy, coaching and an internal information campaign.

What the client said about our approach: "Valitor's experience with Chris' expertise and 2creatEffects has proven highly beneficial. Every event Chris has undertaken for us was done with a great deal of preparation taking into account the group's needs and employing participatory learning. Nothing feels like it comes "off-the-shelf." He simply doesn't rest until the plan is likely to resonate with participants. He goes beyond lectures of facts and cases by requiring groups to work with concepts, tools and methods available in the workplace and applied using gaming techniques. His summaries are insightful and insure that the learning is highlighted and sticks. In the case of Valitor, while communicating the requirements made in standards and law pertaining to AML-CTF compliance, he diligently assessed needs and tailored workshop activities that make the material come alive and applicable to the work situation. He has successfully worked with our Board, executive management and front-line staff. We plan to continue benefiting from his expertise and training methodologies in the future"."

### **Tailoring Service**

The majority of courses are tailored to our clients specific learning and behavioral change needs. Following a short consultancy (SKYPE, EMAIL or in Person) we are usually able to gather enough information to allow this process to undergo seamlessly.

Furthermore, our facilitators are extremely experienced in delivering training, and are able to adjust course tempo and change emphasis in reaction to individual groups as the course is underway.

### **2creatEffects**

2creatEffects was established in 2012 and has delivered bespoke and tailormade educational programmes to over 4000 individuals across numerous professional disciplines. Our courses are embedded into the Swedish Police Academy and a Masters' Degree in Intelligence Analysis. Our clients include Europol, European Commission, NATO, several governments as well as a large number of private sector entities.

### **Pricing**

Our courses are priced in accordance to group size, location and the length of the event (our courses range from 4 hours -2 weeks). We offer competitive rates in accordance with industry standards and are usually able to work within the budget of our client. Discounts may apply for in some instances.

For a free quote, please write to us through our website. <a href="www.2createffects.co.uk">www.2createffects.co.uk</a> or call 003546925007

### Thinking behind the course

#### **The Threat**

Sadly, the global security environment in which we live and work is awash with individuals and groups who are intent on harming our way of life through their involvement with crime and terrorism. They are our greatest adversaries, and often achieve their objectives through sophisticated methods cleverly designed to evade detection. For the most part, these groups require and generate funds that need to be processed electronically and accessible internationally.

By necessity, organized crime and terrorist groups exploit financial institutions to raise, move, hide and launder their money. Individuals working in companies such as yours can play a crucial part in helping governments defend, deter, disrupt and detain criminals and terrorists.

#### **Your Responsibility**

As employees of a regulated financial institution, we are all legally obligated to protect the financial services industry from criminal exploitation.

As citizens, we are duty-bound to help make our societies a safer place to live. Your part in this, no matter how big or small, is important. By fulfilling your part to report suspicious activity, we help directly in building essential evidence and disrupting dangerous activity. Your contribution in helping identify 'bad money' matters.

From a societal perspective, failure to comply with AML regulations leads to a comfortable financial environment for our adversaries, and insecurity for ourselves, spanning the full range of criminality and terrorism.

From a business perspective, failure to comply with AML regulations can have direct consequences on our business including; financial penalties, diminished reputation, loss of business license, failure to meet due-diligence standards, loss of revenue and even imprisonment.

#### **Your Challenge**

Criminals and terrorists often take ingenious measures to cover their steps. They hope that in creating complexity we won't be able to understand and pursue them. No matter what they do to deceive us, they will leave imprints and footprints. Working closely with your partners in law enforcement and intelligence, your job is to identify and report the traces they leave behind.

Comprehensive research has exposed that an unacceptably low % of suspicious transactions (SAR's) delivered to government by the financial services institutions possess any value in combating crime and terrorism. The majority of SAR's are generated through observation of historic criminal activity. This approach forms warning indicators, predictive algorithms, red flags and so on.

The basic underpinning of this approach is flawed. It assumes that our adversaries are static in their approach. That the process of identifying suspicious activity is like building a jigsaw - you know what the final picture looks like, and your job is to locate the pieces and carefully connect them together. Unforgivingly, this playful analogy is frequently too simplistic.

Rather the process of identifying suspicious financial activity might be better compared to the work of an artist - she is presented with a tray of fragmented pieces of colored glass each day, and her job is to try and piece them together into a mosaic. The picture is living and always open to interpretation - there is rarely total certainty.

So, the weakness in the conventional approach to identifying suspicious financial activity is multilayered. The key reasons are as follows:

First, sophisticated groups are dynamic, changing the modus operandi frequently – making them hard to profile.

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Next, many groups will engage in their own research and training – participating in AML training and

learning from court records of successful prosecutions.

Finally, some groups will employ the services of corrupt financial investigators, compliance lawyers

and MLRO's as advisors, so are quick to gain access to our latest knowledge.

**How Bad Money Helps** 

Our aim is to inspire individuals to engage proactively against money laundering and counter terrorist

financing.

Bad Money takes a people-centred approach, since its people like you who are the key asset to

countering money laundering and terrorist financing. We help individuals and teams build the habits

of mind they need to respond to the complex and fast changing environment in which they work.

To report effective, high-value SAR's, requires individuals who possess a working knowledge of how

criminal and terrorist groups operate, and, conversely, how governments go about investigating them.

An understanding of how law enforcement and intelligence tackle the threats is essential.

Furthermore, knowing how to communicate your suspicions in a format that "talks their language" is

key.

But most importantly, individuals charged with this important responsibility must possess a vigilant

mindset, the skill of critical thinking and a well-honed inquiring mind. They must be willing to

continuously learn and open to challenging the status quo.

**Contact** 

Get in touch a free quote

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Or visit:

www.2createffects.co.uk