

## **Role of the National Committee for Anti-Money Laundering**

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Palestine initiated AML efforts very early in 2003. A specialized Unit was established at the PMA. The AML law was decreed by the president in 2007 which was developed with the IMF technical assistance and in line with the international standards for combating money laundering. Then soon after the NCAML was established, it has lead the efforts on AML and issued necessary regulations to achieve this goal. Memorandum of understanding was signed with the relevant stakeholders as to organize the AML efforts on the national level.

The Financial Follow Up Unit was officially established in 2007 as highlighted earlier aiming to keep the Palestinian economy safe from ML activities, maintain sound banking operations free from Financial Crimes and ML activities. This has enabled the banking system to maintain and expand its international correspondent relations with more than 200 international banks all over the World Including Israeli Banks.

The National Committee for Anti-Money Laundering has developed a framework for combating money laundering at the national level. It was vigilant in performing its duties, without compromising the rights of the Palestinian citizen, yet guarantying coordination and cooperation with local competent and supervisory authorities. The NCAML has endeavored to remain abreast of regional and international developments - pertinent to combating the money laundering crime - to gain from the experiences of other countries and improve national capacities in this field.

The FFU has made substantial & professional efforts to protect the Palestinian banking system and financial institutions against any measures that may be enforced by international institutions, due to non - compliance with the criteria for the transfer of illegal funds, or funds with unknown sources. The FFU aims to combat money laundering crime, protect the national economy from the adverse impacts caused by such crime, further improve anti-money laundering procedures and systems in Palestine, and promote cooperation among all local relevant authorities. For this

purpose, FFU was keen to have Certified Anti Money Laundering Specialists (CAMS) on hand; three of the FFU senior staff were certified as such.

Our efforts have been successful in achieving the strategic goal set by the NCAML, namely: to establish a specialized and dedicated staff, capable of managing efforts to combat money laundering at both the institutional and national levels. Training local specialists on combating money laundering has been a unique experience in the region. Our policy was to adopt a clear training strategy that reflects the needs of the local community, and corresponds to essential requirements of financial institutions to enhance their capacity for compliance.

By the end of 2010, the NCAML approved the Palestine Anti -Money Laundering accreditation (PAMLA) which is equivalent to the International CAMPS. It is a Palestinian certificate for combating money laundering. The accreditation is intended for compliance and anti-money laundering officials in banks and money-changing sector, the insurance firms and financial intermediation. It also targets the supervisory authorities of those sectors. The various phases necessary to acquire accreditation focus on raising awareness regarding anti-money laundering, international standards and the efforts exerted to combat money laundering at the national level. This is in addition to hands-on training on real cases. By the end of June 2013, the number of PAMLA certificate holders became one hundred employees working in various Palestinian economic sectors.

The accreditation program has been assigned a specialized committee known as the PAMLA Committee. Its responsibilities include: supervising educational training materials, keeping pace with international developments, amending and updating all scientific and educational materials based on developments in international standards, training, and devising the compulsory exam necessary to obtain the certificate. We were keen to include Committee members' trainers that come from varied knowledge backgrounds. Some had legal or financial backgrounds, in addition to being holders of the CAMS certificate. We were also keen on constant participation of international experts in various stages of program implementation.

### **What Comes After PAMLA?**

Due to the growing significance of compliance with Anti-Money Laundering and Counter-Terrorism Financing Rules (AML/CTF), we decided to keep up with the changes and developments in new international standards. We intend to include new topics that consist with the updated international standards, dealing with the original crimes, and incorporate fully what is known as the FATF 40 recommendations. We are also aware of the need to focus on practical and everyday cases, mainly to update PAMLA holders' knowledge-base and ensure their readiness. Thus, it was crucial to establish a supplementary program known as the (Advanced PAMLA). It targets PAMLA certificate holders, and aims to enhance and develop their capabilities as well as the capabilities of their organizations to meet the new international standards.

### **Ties to the Association of Certified Anti-Money Laundering Specialists (CAMS)**

Holders of the CAMS diligently attend quality meetings, and participate in various regional conferences. The latest of these was the third annual conference for the MENA region, held in Dubai in January 2013. The conference's most notable outcome was networking with the CAMS to discuss future cooperation, and the possibility of holding joint activities in Palestine. The feasibility of including Palestinian specialists in the Association's future activities has also been discussed.

The PMA's instructions stipulate that bank compliance staff must acquire AML professional certificate as a precondition for their appointment. This is to ensure that compliance positions have the required efficiency, in addition to enhancing the capacity of compliance staff employed at financial institutions. This defines the pre-appointment conditions for local candidates as follows: to obtain the PAMLA certificate on the local level, or the CAMS certificate on the international level.

Undoubtedly, both the NCAML and the PMA will keep up these measures in their pursuit to prepare and qualify a team of anti-money laundering specialists. This conviction stems from the gravity of this crime and its consequent devastating impact on the reputation, as well as on

international relations of society, and the national economy at large. This is added to the belief that a qualified and efficient staff is one of the key factors necessary to curb and overcome this crime.