



NATIONAL IMPLEMENTATION PLAN ON MONEY LAUNDERING AND TERRORISM FINANCING RISK ASSESSMENT (2018 – 2020)

REPUBLIC OF SIERRA LEONE

1. INTRODUCTION

Sierra Leone's first National Money Laundering and Terrorism Financing Risk Assessment (NMLTFRA) was conducted to identify, assess and understand ML/TF risks in Sierra Leone and determine how such risks can be mitigated. It evaluates the threats and vulnerabilities of the various sectors to ML and TF risks, with the overall objective of integrating ML/TF risk mitigating measures into the National Strategy on Anti-Money Laundering and Combating the Financing of Terrorism for Sierra Leone.

The National money laundering and terrorism financing Risk assessment (NMLTFRA) was able to clearly identify risks, threats and vulnerabilities across various areas and sectors. The assessment developed key priority actions to respond to those identified threats and vulnerabilities.

This Implementation Plan fully adopts the priority actions of the NMLTFRA to serve as the roadmap for various competent authorities to take required measures in addressing the gaps and identified issues in the National risk assessment report. The Implementation Plans consists of objectives, identified issues, proposed measures/actions, clear and realistic timelines and resource requirements. When the timelines are indicated as „on-going“, it implies that the progress in such measures is supposed to be reviewed periodically, in co-operation with corresponding institutions.

The Financial Intelligence Unit will house the coordinating Secretariat for the implementation of the Action plans through measures envisaged in the NMLTFRA.

2. CORE PRINCIPLES OF THE IMPLEMENTATION ACTION PLAN

This implementation plan will be rolled out based on the following strategic principles:

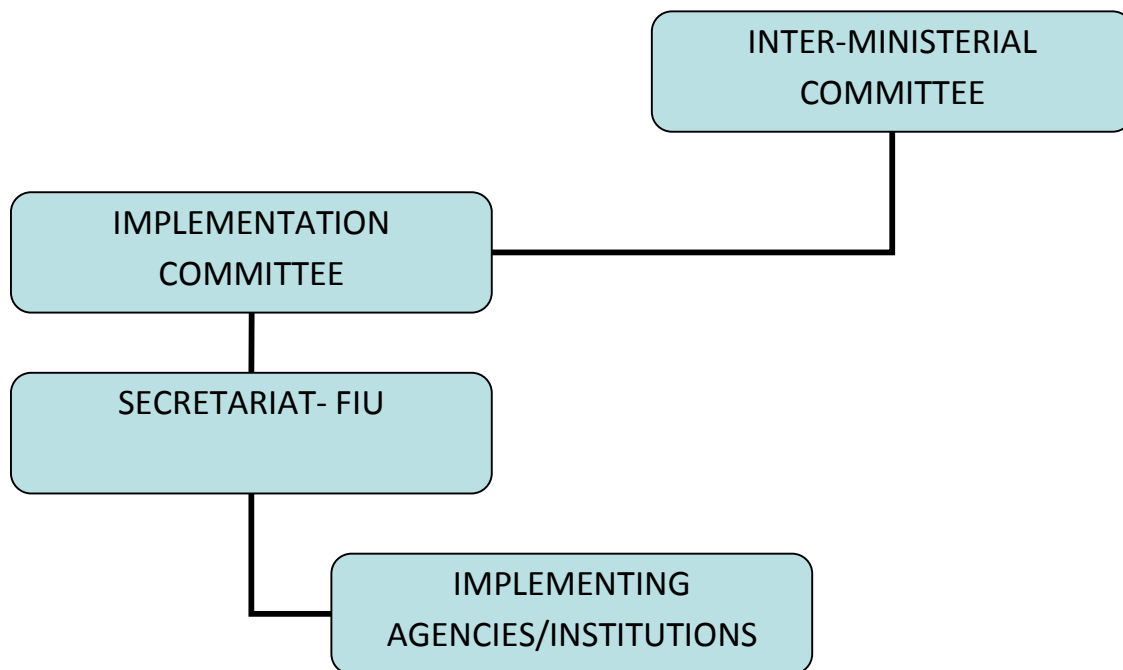
"Political leadership" – setting the tone at the top:- clear and unambiguous commitment to improving the AML/CFT regime in Sierra Leone will be critical to successful implementation of the action plans;

"Think big" and "start small" – the implementation plan involves series of reforms across all the sectors, so that each will complement the other over time, providing the required horizontal improvement in compliance with relevant standards; giving priority to achievable, early, low cost actions which can demonstrate prompt and visible results ("quick wins");

"Domestic cooperation and coordination" - The successful implementation of the plan will depend to a large extent by the level cooperation and coordination among the various sectors and competent authorities. Consistent with FATF Recommendation 2, mechanisms should be in place to enable policy makers, the Financial Intelligence Unit (FIU), law enforcement agencies, supervisors and other relevant competent authorities to co-operate, and where appropriate, co-ordinate domestically with each other concerning the development and implementation of AML/CFT policies and activities. Such mechanisms should apply at both policymaking and operational levels.

2.1 IMPLEMENTATION MECHANISM

Implementation of the action plans is the responsibility of the stakeholders earmarked in the Implementation Action Plan. However the focal point will be the Implementation Committee, which will be established by the Technical Committee of the FIU with oversight by the Inter-Ministerial Committee. The Secretariat for the Implementation process will be housed by the FIU to coordinate the activities of the Implementation Committee. The structure of the implementation mechanism is provided below:



2.2 COMPOSITION OF IMPLEMENTATION COMMITTEE;

The AML/CFT technical Committee will constitute the national Implementation Committee with oversight by the AML/CFT Inter-Ministerial Committee. The Technical Committee can co-opt other stakeholders into the implementation Committee who are not necessarily members of the Technical Committee for the purpose of this implementation plan.

2.2.1 TASKS OF IMPLEMENTATION COMMITTEE

- Monitor the implementation process
- Review implementation process through progress report submitted by the responsible institutions/agencies.
 - Prepare report on the implementation for the attention of the IMC

3. CONCLUSION

This Implementation Action Plan is based on a thorough analysis and risk assessment of ML/TF across all sectors of the economy. However, each institution, sector or profession has its own tasks, while the primary responsibility lies with law enforcement and prosecution authorities, as well as supervisory bodies in ensuring commitment to the implementation process, the judicial bodies and Parliament are also of crucial importance for success in combating money laundering and terrorism financing in Sierra Leone.

For the plan to be successfully implemented, there is a need for political commitment and Inter-agency cooperation amongst key stakeholder institutions.

SIERRA LEONE NATIONAL ML/TF RISK ASSESSMENT IMPLEMENTATION MATRIX FOR THE PERIOD: 2018-2020

OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Effective Enforcement structure and Resources	Weak implementation of CDF&lack of X-border monitoring system for cash & bearer notes	Proceeds of Crime	• System for distribution of CDF at all ports, borders & crossing • Regulations adopted setting forth roles, responsibilities, obligations & procedures for all agencies working at ports & borders • Training on new procedures for officials of agencies operating at ports/borders to be conducted by FIU in consultation with NRA , Immigration and SLP.	• Customs , NRA(Lead) , FIU Immigration and SLP	• Adoption of enforceable regulations setting forth procedures for new CDF enforcement at ports & borders • Officials from all agencies operating at ports/borders trained pursuant to new procedures	Dec 2018 July 2018	Customs and SLP officers at entry points to implement the CDF. CDF to be made available
System for data collection and management across all sectors	No systematic data collection of data/stats of ML/TF cases, predicate offenses, investigation, prosecutions, convictions, asset seizures, etc		• FIU to work with officials of relevant agencies to identify all statistics & data to be provided on [monthly or quarterly] basis for purposes of analysis & tracking • Each agency to designate official to collect relevant data/stats & provide to FIU on [monthly/quarterly] basis • FIU to adopt process for analysis of case stats/data resulting in findings on activities & trends • FIU to provide quarterly report on case stats/data analysis in respect of trends, etc	• FIU(Lead)SLP, Law Office, Judiciary, ACC, Immigration NRA	• Agreement among agencies on: (a) type of stats, data & info to be provided on [monthly/quarterly] basis; (b) format to be provided; (c) designation of liaison officer responsible to collect & provide data/statistics; • FIU to adopt methodology for analysis on tracking of cases & identifying trends • FIU to provide relevant agencies [monthly/qtrly] reports	Jun 2018	• Computer hardware and software application • Human resources • Capacity building in training and development

					on case tracking & trends analysis		
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIME FRAME	RESOURCES/REQUIREMENTS
Ensuring the effectiveness of the Asset disclosure system	Low compliance rate with Asset Disclosure regime and the limitation of access by other LEAs to asset disclosure information	Proceeds of Crime	-ACC to issue new AD regulation clarifying scope of officials subject to AD obligations -ACC to implement systematic & reliable procedures for obtaining updated & reliable payroll & staff lists from all agencies needed to assess compliance with AD obligations -ACC to impose effective & dissuasive sanctions for non-compliance with AD obligations on all non-compliant officials, regardless of status, title or position • ACC to sign MOUs with FIU & other relevant LEAs setting forth details of info sharing on corruption related cases	ACC	-New ACC Regulation to improve AD compliance issued -ACC adopts & fully implements written procedures for obtaining complete, reliable & updated payroll & staff lists on the basis of which assessment of compliance with AD obligations is conducted -ACC Internal Procedures adopted for imposition of effectively dissuasive sanctions on all officials, regardless of rank, status or title, -ACC signs written MOUs with relevant agencies on info exchange for corruption cases.	Dec 2018	• Automate AD process • Computer hardware and software application • Increased budget allocation
Comprehensive and effective legislation	Absence of provisions from AML/CFT law related to unexplained wealth &		-Amend AML/CFT law & other relevant laws as needed and issue relevant implementing regulations to ensure relevant agencies have legal authority to do the following: -Provision on unexplained wealth	• FIU(Lead Agency) Parliament, TC IMC, Cabinet	-Amendments to AML/CFT law adopted -Amendments to other relevant laws adopted -Enforceable implementing regulations to AML/CFT	March 2018	• Enact laws • Formulate policies and regulations

	proceeds of crime Unavailability of Proceeds of Crime Act		within the AML/CFT Act, 2012. -Include other provisions to address handling and use of proceeds of crime in the AML/CFT Act, 2012. -Amend Section 68 of the AML/CFT Act, 2012 to broaden the scope of relevant Authorities to include FIU, ACC and CISU.		law issued -Enforceable implementing regulations to other relevant laws issued		
Legal framework and institution arrangement for Management of Proceeds of Crime	No mechanism for the management of assets of proceeds of crime.	Proceeds of Crime	-Proceeds of Crime Legislation -Establish an asset forfeiture Unit within Ministry of Justice.	Law Office, Attorney General (Lead Ministry) SLP, FIU	To be able to manage assets of proceeds of crime	March 2018	• Enact laws • Formulate policies and regulations • Capacitate technical know-how
Effective regulation of Accountable Institutions	Weak implementation of PEP requirements by Reporting Entities	Banking	-FIU to coordinate with other agencies to draft, adopt & issue national definition of PEPs by amending relevant law & issuing enforceable implementing regulations	• FIU, ACC, BSL, SLICOM, GLA, ICASL	- Amendments to relevant law/s adopted with clear & enforceable definition of PEPs. -Implementing regulations issued pursuant to relevant laws on basis of which reporting entities will implement PEP requirements at acceptable international standards	June 2018	• Enact laws • Formulate policies and regulations
Comprehensive and effective legislation	Weak criminal law evidence framework		-Amending the documentary Evidence Act to provide for the recognition of evidence obtained using modern technology. -Enactment of the Criminal Procedure Bill -Law reform to sufficiently address issues of electronic evidence and their admissibility in court.	Law Office (Lead Agency) LRC	• Relevant amendments to law/s adopted • Enforceable implementing regulations adopted	June 2018	• Enact laws • Formulate policies and regulations • Capacity building in training and development

Strengthening law enforcement capability	Non availability of devices to aid intelligence	•	-Acquisition of devices – ONS to raise proposal on behalf of the following intelligence and Law enforcement agencies; • SLP(IIS) • CISU • FISU • FIU • ACC.	ACC, FIU, CISU, FISU ONS	-Detailed proposal for procurement of specifically identified electronic devices drafted with all technical specifications, prices & full justification of needs. -Proposal submitted to appropriate authority pursuant to applicable procurement procedures.	DEC 2018	• Allocation of resources both human and materials • Capacity building in training and development
Testing the effectiveness of the AML/CFT Act, 2012	Lack of ML/TF cases getting to court		FIU to lead a study coordinated with Min Justice, SLP, Law Office, ACC & other relevant agencies to identify: • Whether ML/TF charges are being applied (or not) in relevant cases; if not, why not (identify specifically the impediments & solutions to remove them) -Whether ML/TF cases are getting to investigation stage & if not why not (identify impediments and solutions to remove them) -Whether MLTF cases are reaching prosecution stage & if not why not (identify specifically the impediments & solutions to remove them) -Why ML/TF convictions have not yet been achieved -Identify specifically where in the court process the cases are failing or being thrown out of court.	Law Office(Lead Agency), SLP, ACC & FIU	-Report on impediments to successful convictions in ML/TF cases drafted by FIU, reviewed by other agencies & adopted [This report should have findings, conclusions & recommendations aimed at removing the identified impediments; and responsibilities for Actions & Implementation with time bound deadlines should be added to this Action Plan].	DEC 2018	• Resources allocation to monitor effectiveness • Develop and adopt memorandum of understanding

			-Consider that the lack of effective supervision in all sectors is likely a contributing factor as the most suspicious (& likely most successful cases are not likely even being reported to FIU as STRs because no penalties for non-reporting of suspicious transactions or non-compliance with CDD/KYC and other preventive measures are being applied				
Permanent case law indexing and digesting system on ML/TF	Inadequate Case Law Reporting	•	- Set up a team of legal specialists dedicated to adopt a plan & design for a permanent system for case law reporting (digesting & indexing) of cases in easily searchable format so that all cases are digested, indexed & published in form available to the public in a timely manner after decisions is reached - Ministry of Justice to research systems in other countries as much of these activities are delegated to commercial enterprises that undertake certain aspects of this work to reduce government costs	Ministry of Justice	- Permanent case law indexing & digesting system adopted & implement that ensures all cases & related info is easily searchable and made publicly accessible in a timely manner adopted by Ministry of Justice - Action Plan for implementation adopted by Min Justice	DEC 2018	- Legal experts - Policy formulation
Financial Inclusion	Strategy to reduce use of cash in economy		-National Fin. Inclusion Strategy to include necessary amendments to laws & regulations needed -Respective agencies to draft necessary amendments to laws & regulations to make legal frameworks consistent with National Inclusion Strategy	BSL, NATC OM, FIU & MOFA	-National Financial Inclusion Strategy adopted by Government. -Action Plan to implement National Financial Inclusion Strategy adopted by Government -National Coordinator identified by Government	DEC 2018	- Innovation in financial products and services - Policy formulation

			-FIU to collaborate with BSL on tailoring AML/CFT compliance requirements for DNFBP Sectors & lower risk sectors		to oversee & coordinate implementation of National Financial Inclusion Strategy & Action Plan -Laws & regulations drafted & adopted		
Effective enforcement structure & Resources	Eliminate unregistered remittance service providers		-BSL to adopt written strategy & action plan to implement effective supervision & oversight of remittance sector -BSL to sponsor drafting & adoption of necessary laws/regulations aimed at obligations & deadlines for registration & of unregistered remittance providers with sanctions for enforcement -BSL to adopt strategy for strict enforcement & applying sanctions to unregistered remittance providers -BSL to adopt risk-based inspection procedures for supervision of remittance providers -FIU to work with BSL to adopt AML/CFT requirements tailored to remittance service sector	BSL, FIU & Corporate Affairs Commission	- BSL issues written strategy & action plan to effectively identify, supervise & regulate remittance sector - Relevant laws & regulations adopted - Internal AML/CFT inspection procedures adopted that are tailored to remittance sector	Dec 2018	Effective enforcement of laws and regulations by BSL
Risk based approach to	Adopt strategy for		Terrorism Prevention Committee to draft & adopt strategy for	Immigration Office,	Adoption of anti-terrorism strategy	DEC 2018	Formulation of counter

terrorism prevention	monitoring groups at higher risk for links to terrorist activities		targeted monitoring of groups that present higher terrorism & TF risks • identify & implement wider uses for UNSC lists, beyond reporting entities (for example trade licenses, government contracting & procurement, etc) higher risk groups • initiate drafting & adoption of laws/regulations • Assess the role of regulatory institutions in the enforcement of targeted financial sanctions	Terrorism Prevention Cmte (Lead), CISU & BSL	• Draft & sponsor adoption of relevant laws & implementing regulations to fully implement strategy		terrorism policies and strategies • Increase resources allocation both human and materials
Strengthening Border security	Smuggling of precious stones, metals & minerals		• Enhance the capacity of custom, border guards & airport authorities to identify and crackdown on the smuggling of precious minerals and stones • FIU to initiate significant improvements to AML/CFT supervision of precious stones & metals dealers by improving supervision, tailoring risk-based compliance requirements, commencing regular AML/CFT inspections & imposing sanctions for non-compliance	NMA, MMR, Prev Terrorism Cmte, NRA, Immigration Office, FIU & BSL, GGDO	• Special training programs for customs, borders & immigration officials at ports & borders • Adoption of necessary laws (or amendments) to improve effectiveness of AML/CFT supervision of precious stones & metals dealers • Adoption of AML/CFT inspection procedures to assess compliance in this sector • Imposition of effectively deterrent sanctions to address non-compliance	MAR 2018	
Strengthening the AML/CFT legal framework	Absence of a counter-terrorism legislation	•	• Adoption and implementation of National Counter-Terrorism strategy.	• ONS (Lead), Parliament, Prevention	• National Anti-Terrorism Strategy adopted • Laws adopted or	DEC 2018	

	&resources to implement terrorism prevention strategy		• Ensure laws are in full compliance with all int'l obligations related to anti-terrorism & TF.	of Terrorism Cmte, FIU,	• amended • Implementing regulations adopted • Training delivered for all officials & agencies responsible for implementing		
Effective enforcement structure & Resources	Inadequate implementation of targeted financial sanctions relating to terrorism financing	•	• FIU to amend relevant laws & issue tailored implementing regulations to improve effectiveness of supervision & compliance with CFT obligations in all financial institutions & reporting entities • FIU to adopt strategy & detailed action plan for step-by-step improvements in these areas	FIU, GSL, GLC, SLICOM & ICASL	• Adoption or amendment of laws & regulations • Adoption of Action plan to improve supervision, compliance & enforcement with TF obligations in all sectors	March 2018	
Strengthen supervision and enforcement	Inadequate supervision and monitoring of community-based orgs & NPOs	•	• FIU to conduct assessment of laws/regulations related to AML/CFT supervision & compliance monitoring of community based orgs/NPOs & issue strategy identify deficiencies related to int'l obligations, including designating responsible supervisor • FIU together with responsible supervisory authority to implement Action plan, amend laws & issue regulations to improve effectiveness of supervision, compliance by NPOs, adopt internal AML/CFT inspection	Corp. Affairs Commn, Min Soc. Welfare, Min of Local Gvmt, FIU, MF & local Gvmt MOFeD (Lead Agency)	• FIU to issue report of deficiencies in legal AML/CFT frameworks related to NPOs & Action Plan to remedy deficiencies • FIU to work with MoFED to draft amendments to legal frameworks & implementing regulations to improve supervision, compliance monitoring & enforcement of AML/CFT obligations of NPO sector	DEC 2018	

			procedures & conduct inspections applying effectively dissuasive sanctions to address non-compliance				
Institutional strengthening and capacity building	Limited capacity in counter terrorism and suppression of terrorist finance		Ensure that staff of stakeholder institutions on AML/CFT are adequately well trained and develop to address the identified deficiencies: • Ability to track the sources and utilisation of funds by NPOs • Ability to monitor electronic payment systems. • Software to detect terrorist financing trail	FIU, Prevention of Terrorism Comte & CISU, BSL, SLP, TOCU	To have staff of stakeholder institutions with the appropriate knowledge, skills and expertise to handle act of terrorism financing including illicit financial flows.	Dec 2018	
Public outreach and sensitization	Low level of awareness on terrorism financing and its counter strategy to minimize risk and impact	•	• Ensure that reporting entities and counter-terrorism stakeholder institutions are sensitized and well informed on TF. • Outreach program to raise awareness on TF issues	FIU, Prevention of Terrorism Comte, BSL	To raise awareness on terrorism financing and its prevention at national, regional and global level	DEC 2019	
	Lack of IT infrastructure and digital data platform to facilitate data collection, processing, storage and communication		To establish a database to support national counter terrorism strategy	CISU(Lead Agency), Prevention of Terrorism Comtee, SLP, Judiciary, FIU & TOCU	Accessible data base to provide information to stakeholders in the implementation of counter-terrorism strategy.	DEC 2018	
			NATIONAL VULNERABILITIES				
			PROPOSED	MAIN ACTORS		PROPOSED	RESOURCES/RE

OBJECTIVE	IDENTIFIED ISSUES	SECTOR	MEASURES/ACTIONS	(LEAD* AGENCY)	RESULTS/OUTPUTS	TIMEFRAME	REQUIREMENTS
Public outreach and sensitization campaign	General lack of knowledge on ML and how it relates to the predicate offences		Sensitization campaign among law enforcement agencies, supervisory authorities and private sector on money laundering and terrorism financing	FIU, BSL, SLP, SLICOM, Media	Nationwide awareness and popularization of ML and how it relates to the predicate offences	DEC 2018	
System for data collection and management across all sectors	Weak data management system	•	• Identification of data/statistics required to measure the effectiveness of the AML system from MDAs by FIU • Training in data management for supervisory and law enforcement agencies • Provide the required equipment / tools to enhance proper data management system	FIU, banks, FX Bureaus, SLP, MDA's Judiciary, NCRA	• Effective data management system • Improved record keeping • Easy detection of financial anomalies • Tracking of proceeds of crime and assets linked thereto	DEC 2018	
Enforcement of access to information for LEAs	Inadequate record keeping, restricted access to documents / data sharing within the formal sector		Enactment of a legislation that will make it mandatory for especially the public sector to grant access to documents that will help in national security.	SSSL(Lead) Parliament Civil Society Relevant MDAs AML Supervisory Bodies	Unhindered access to documents information Reduces delay in investigations and provides concrete/solid evidence for prosecutions	DEC 2018	
	Inadequate financial crime investigators /	-	- FIU to collect statistics to ascertain the reasons for inadequate investigation	FIU, SLP, ACC	Enhance the effectiveness of financial investigation as a precursor to successful	DEC 2018	

	lack of expertise in investigating financial crime		-Train Financial Crime Investigators on forensic investigation, analysis of financial records. -Recruit experts in financial crime to deal with such matters (as a temporary to mid-term measure). -To incorporate modules on money laundering and terrorism financing in the training manual of the SLP	FIU, SLP	prosecution of ML cases in court Restraint/minimizes the ML activities in Sierra Leone Enhance the knowledge of recruits at the PTS on ML/TF issues		
Effective regulation of accountable institutions	Weak supervision and monitoring of financial institutions	-	- Buy modern technological devices / tools to enhance electronic supervision and monitoring - Conduct on-the-spot checks / spontaneous visits to reporting entities. - Appropriately penalise / sanction defaulting reporting entities	FIU, BSL	Improve compliance in reporting STRs and SARs. Enhance productivity.	DEC 2018	Remote Interface between supervisory bodies and reporting entities
To enforce security and restore law and order in porous land border areas	Porosity of land borders	-Security Sector	- Recruit new staff to man BCPs - Conduct regular trainings for border employees on cross border security and management - Equip staff with modern technological devices / tools to effectively monitor	Immigration, SLP, ONS, RSLAF, NRA	• Enhance competence and motivation. • Improve vigilance. • Enhance efficiency and effectiveness • Increase knowledge	DEC 2018	• Deploy law enforcement personnel that comprise SLP, ONS, RSLAF, Immigration and NRA. • Provide vehicles to patrol the land border areas. • Construct more

			- cross border activities Adequately cater for the welfare / needs of employees, especially border operatives, to create a conducive working environment				security posts. • Provide equipment such as solar powered surveillance cameras so as to enhance monitoring.
To transform the uncontrolled informal sector to formalized sector through financial inclusion strategies	Unregulated / uncontrolled informal sector (shadow economy)	- Financial Sector	- Remove incentives for evading tax liabilities / lower payroll taxes - Adopt /enforce a policy for all MDAs to ensure that all vendors / contractors they deal with are tax compliant - Attempt to capture tax evaders (using the presumptive tax system) - Improve the flexibility of employment protection laws - Lower cost for licensing and easy requirement for business registration. - Ensure adequate and transparent payment of tax returns (GST /VAT) to tax payers. - Develop National Financial Inclusion Strategies	MoFED, NRA	• Positive turn-around of the economy • Reduce the informal economy / shadow economy. • Increase tax compliance	DEC 2019	• Designate or establish new institutions that will serve as supervisory bodies for some sectors of the shadow economy. • Urge financial institutions such as banks to develop products and services that will promote financial inclusion • Enact laws, formulate policies and regulations for formalization of the shadow economy
Successful investigations and convictions ML/TF cases	Investigations without prosecution and conviction,	-	- Conduct trainings /refresher sessions for state prosecutors, magistrates and judges on unique technical	MoFED, MOJ, FIU, LOD, Bar Association	• Increase knowledge on ML and its predicate offences among legal practitioners.	DEC 2018	• Increased budget allocation to MDAs on training and development

	and lack of knowledge on unique technical aspects of ML /TF cases		and procedural aspects of ML/TF, and its predicate offences - Adopt policies that enhance financial motivation		• Enhance conviction		• Develop policies that are performance driven in investigations and prosecutions
Crackdown on corruption and improve public perception	Corruption in the public sector	-	- Timely allocation of the required resources to MDAs - Ensure the establishment of Integrity Committees in all MDAs and monitor their effectiveness - Publicly name the top 10 corrupt MDAs annually from the Bribery Perception Survey - Regularly conduct series of sting operations / controlled delivery. - Capacity / strengthen the ACCs Intelligence Unit - Investigate the findings of the Auditor-General's reports, and follow-up on the implementation of recommendations.	MoFED, ACC	• Reduce corruption in the public sector • Restore integrity • Improve accountability	DEC 2018	• Increased budget allocation to ACC. • Adopt policies that gauge public perception on corruption
Strong and effective application of CDD & KYC principles	Weak application of the CDD & the KYC	-	- Effective fulfillment of supervisory functions by supervisory authorities. Application of sanctions for compliance breaches.	• FIU, Supervisory Bodies	Effective supervision and monitoring of FIs/DNFBPs in the application of KYC/CDD	MAR 2018	• Draft and implement AML/CFT guidelines for both FIs & DNFBPs

Enhance investigation and effective prosecution and conviction of cases	Low level of Investigations and attendant low number of cases prosecuted and the lack of conviction		• Train prosecutors and magistrate on ML and its predicate offences • Adopt policies that enhance financial motivation • Specialized court for financial crime to enhance speedy adjudication of cases	FIU, Law Officers Department, SLP, Bar Association, GLC	Reduce/minimize the lack of knowledge of ML and its predicate offences among legal practitioners thereby mitigating appropriate sanctions on perpetrators.	MAR 2018- DEC 2019	• Provide more resources to LEAs on areas relating to investigation, prosecution and conviction.
Have laws that cover all predicate offenses to ML	Lack of specific legislations on key predicate offenses to ML	•	• Enact laws against Human Smuggling, Terrorism, Cyber security and maritime security to combat ML. • Government to adopt a policy on Freedom of Information	Parliament, LOD, CISU, ONS, SLP, MIC, MSWGCA, RSLAF, SLMA	ML is usually accompanied by other forms of organise crime, the enactment into law/ formulation of policies of the above mentioned would facilitate a comprehensive approach to counter ML in SL.	DEC 2018	• Enact laws • Formulate policies and regulations
			Banking Sector				
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Subject the Apex Bank to adequate regulation	Absence of proper supervisory guidelines to adequately regulate the Apex Bank		Bank of Sierra Leone to develop the following: • enforceable implementing regulations • adoption of AML/CFT Inspection Procedures • Do enforceable regulations & internal BSL procedures exist for payment by FIs of	BSL & Apex Bank	• enforceable implementing regulations adopted • AML/CFT Inspection Procedures adopted • enforceable regulations & internal BSL procedures for payment by FIs of monetary penalties	MAR 2018	• Draft and implements guidelines

			monetary penalties				
Enforcement of sanctions for non-compliance compliance	Absence of AML monetary sanctions		Adopt enforceable: • implementing regulations • internal procedures to enable the use of monetary penalties, and which set forth procedures for payment, compliance monitoring, interest penalties for late payment, monitoring/auditing of monetary sanctions account	FIU, BSL	• implementing regulations adopted • internal procedures adopted		• Sign memorandum of understanding • Draft guidelines for various types of sanctions
Enhance level of monitoring of reporting of CTR or STR	Inadequate monitoring on reporting of CTR or STR by Community Banks		Monitoring of CTR & STR reporting and compliance with all AML/CFT obligations. Consider also: • Adoption of Risk-Based AML/CFT Inspection Procedures by supervisory authority tailored for community banks • Adoption of enforceable AML/CFT regulations tailored for Community banks • Training of community banks on (tailored) risk-based implementation of AML/CFT	FIU, BSL & Apex Bank	• Risk-Based AML/CFT Inspection Procedures for community banks adopted by supervisory authority • enforceable AML/CFT regulations (tailored for Community banks) issued by supervisor • Training of community banks on (tailored) risk-based implementation of AML/CFT obligations • Supervisory AML/CFT	MAR 2018	• Draft guidelines for compliance • Conduct training and development

			- obligations - Commencement of AML/CFT inspections of community banks		inspections on community banks commenced		
Obtain credible lead and intelligence	Lack of software appropriate to analyse STR and CTR data	•	Consider whether this item is better placed in National Vulnerabilities since it is the responsibility of the FIU rather than BSL,	FIU	- FIU commences building searchable database of info & data collected from STRs/CTRs - Higher quality analysis of STRs/CTRs produced	JUNE 2018	- Acquire GO AML software - Capacity training and development
Enforce AML/CFT compliance culture	Absence of consolidated AML/CFT examination procedure for the Banking Sector and other Sectors	•	AML/CFT inspection procedures will differ significantly between supervisory authorities; it would be ineffective to use AML/CFT Inspection Procedures for banks in other sectors, because the clients, transactions & risks differ rather significantly. Keep in mind that inspection procedures for various types of FIs may need	BSL, FIU	Unified inspection procedure for assessing AML/CFT compliance within the Banking Sector	MAR 2018	- Sign memorandum of understanding with key stakeholders - Adopt policies and procedures - Allocate resources for training and development

			risk-based tailoring]				
Enhance compliance with AML/CFT obligations and requirements	Consider adding the following: Lack of AML/CFT Monitoring & Evaluation program	•	- Adoption of M & E program to systematically measure & improve effectiveness of AML/CFT supervision - Adoption of plan for systematic collection of statistics & data resulting from AML/CFT inspections		- M & E program to systematically measure & improve effectiveness of AML/CFT compliance monitoring adopted & implemented - Statistics/data from AML/CFT inspections provided on a [monthly or quarterly] basis to FIU	JUNE 2018	- Adopt policies and procedures - Capacitate personnel training and development
Enhance effectiveness of CDD & KYC Principles	Inadequate identification infrastructure	•	Government to implement the unique identification system	NCRA	Proper identification of customers and reduction of fraud attempts in the banking sector.	2017 -2018	Adopt and implement guidelines
Effective monitoring of PEP customers	Inadequate procedure in handling PEPs	•	FIU and BSL to update procedures by issuing comprehensive guidelines on handling PEPs accounts	FIU, BSL	Improved procedures on handling PEPs accounts and reduction in risk of money laundering.	2017-2019	Adopt guideline and other related measures
			SECURITIES SECTOR				
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Protect stock market from market	Absence of law criminalisation Insider-Trading and Market Manipulation		Passing of the SEC Bill Does the current version of the SEC bill contain all necessary AML/CFT	BSL Law Office	To provide for the operations of the Stock Exchange SEC bill that contains all	JUNE 2018	- Enact Laws and regulations - Draft guidelines and adopt polices

manipulation			- requirements? • Won't enforceable AML/CFT implementing regulations be needed? • Internal AML/CFT Inspection Procedures (tailored for securities sector) will also be needed.		- necessary AML/CFT requirements adopted • Enforceable AML/CFT implementing regulations adopted • Internal AML/CFT Inspection Procedures (tailored for securities sector) adopted		
Facilitate trade and investment	Non existence of a Security Exchange Commission	•	• Set-up a Security Exchange Commission	GoSL	• Permanent authority created To implement the Act& responsible for effective oversight & compliance monitoring of securities activities	MAR 2018	• Enact laws and regulations • Allocate budget line
Enhance efficiency of the market	No rules governing the operations of the players in the market	•	• These would be stated in the law & enforceable implementing regulations	SEC	Implementation of laws and regulations	MAR 2018	• Adopt policies and procedures
Ensure that other financial series is up-to-date	Inadequacy in the OFS Amended Act 2007	•	• Enactment of the Securities law	SEC BSL	• To have a robust law that meet international standard	DEC 2018	• Enact laws and other related polices
Enforce supervision mechanism	No AML/CFT supervision by Regulators	•	• Adoption of internal AML/CFT inspection procedures tailored for the securities sector	BSL SEC	To monitor activities of the market in line with measures outlined in the fight against ML/TF including:	DEC 2018	• Resources allocation • Human resources

			• Enforceable regulations to permit imposition of monetary penalties to address AML/CFT compliance violations • Enforceable regulations & internal procedures adopted for the payment of monetary penalties		• AML/CFT internal inspection procedures adopted (tailored for the securities sector) • Enforceable regulations on imposition of monetary penalties adopted • Enforceable regulations & internal procedures for payment of monetary penalties adopted		
Ensure adequate monitoring and evaluation program	Lack of AML/CFT Monitoring & Evaluation program	•	• Adoption of M & E program to systematically measure & improve effectiveness of AML/CFT supervision • Adoption of plan for systematic collection of statistics & data resulting from AML/CFT inspections		• M & E program to systematically measure & improve effectiveness of AML/CFT compliance monitoring adopted & implemented • Statistics/data from AML/CFT inspections provided on a [monthly or quarterly] basis to FIU	DEC 2018	• Resources allocation • Human resources

INSURANCE SECTOR

OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Ensure	Insurance Act,2016		Review of insurance	SLICOM,	Enactment of	DEC 2018	• Amend the law

that AML/CFT preventive measures are incorporated in the Insurance Act 2016	do not make adequate provision for AML/CFT preventive measures, including administrative penalties for non-compliance		Legislation to capture ML/TF activities	MOFED and Insurance Industry	amendments to insurance Law		• Allocate resources both human and material
Effective tailored regulation for the insurance sector	Absence of enforceable AML/CFT implementing regulations tailored for insurance sector		Draft & adopt: • enforceable AML/CFT implementing regulations related to AML/CFT compliance monitoring tailored for insurance sector • Internal AML/CFT inspection procedures tailored for insurance sector • Enforceable regulations establishing rules/procedures for imposition & payment of monetary penalties	SLICOM & F.I.U	• enforceable AML/CFT implementing regulations adopted • Internal AML/CFT inspection procedures tailored for insurance sector adopted • Enforceable regulations establishing rules/procedures for imposition & payment of monetary penalties adopted & implemented	JUNE 2018	• Formulation of policies, directives and regulations
Capacity SLICOM on AML/CFT	Limited human resource capacity at SLICOM		Recruit and train staff of SLICOM	SLICOM & MOFED	Capacitate staff effectively monitoring ML/TF activities • AML/CFT supervisory training program for insurance sector developed • AML/CFT	JUNE 2018	• Resource allocation both human and material • Training and capacity developme

					supervisors training program for insurance supervisors commenced & implemented		nt
Close the knowledge gap in the insurance industry	Limited Human Resource capacity to handle AML/CFT issues in the insurance industry	•	- Adoption of AML/CFT training program for insurance sector - Delivery of AML/CFT training program for insurance sector	F.I.U & GIABA	Enhanced compliance of the insurance industry in ML/TF issues - AML/CFT training program for insurance sector adopted. - Delivery of AML/CFT training program for insurance sector commenced	JUNE 2018	Capacitate training and development
Strengthen compliance culture	Absence of compliance officers in the insurance industry on ML/TF issues		F.I.U to recommend the appointment of compliance officers in the insurance industry.	F.I.U, SLICOM & Insurance Industry	Enhanced compliance of ML/TF in the insurance industry	JUNE 2018	Allocate resources both human and material
Effective monitoring and evaluation AML/CFT programs	Consider adding the following: Lack of AML/CFT Monitoring & Evaluation program	•	- Adoption of M & E program to systematically measure & improve effectiveness of AML/CFT supervision - Adoption of plan for systematic collection of statistics & data	SLICOM	- M & E program to systematically measure & improve effectiveness of AML/CFT compliance monitoring adopted & implemented - Statistics/data from AML/CFT	JUNE 2018	- Allocate resources both human and materials - Capacitate training and development programs

			resulting from AML/CFT inspections		inspections provided on a [monthly or quarterly] basis to FIU		
OTHER FINANCIAL INSTITUTIONS							
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Enforce implementation of AML/CFT measures by bureaus	Inadequate implementation of AML/CFT preventive measures by FX Bureaus including; KYC/CDD, record keeping & STR reporting	•	- Supervisory authorities to issue improved & enforceable AML/CFT regulations which are based on risk-based approach that are specifically tailored to “other FI” sectors that include sufficiently wide range of effective & dissuasive penalties to address non-compliance - Supervisory authorities to adopt Internal AML/CFT Inspection Procedures based on risk-based approach, that are specifically tailored for these sectors - Supervisory authorities to adopt risk-based AML/CFT Inspection plans & schedule specifically tailored for these sectors	BSL, FIU	- Enforceable & risk-based AML/CFT regulations issued specifically tailored for other FI sectors - Risk-based internal AML/CFT inspection procedures adopted that are specifically tailored for other FI sectors - Supervisory authorities to maintain statistics & records relating to AML/CFT supervisory inspections for these sectors to FIU on quarterly basis, including: (a) # of inspections; (b) # & type of compliance deficiencies identified; (c) # and type/amount of sanctions imposed. - Supervisory	JUNE 2018	- Allocate resources human and materials - Adopt guidelines, policies and procedures

					authorities to report above statistics to FIU on quarterly basis		
Enforce full and complete disclosure of transactions	Inadequate disclosures of transactions (spot and remittances)	•	- Robust enforcement of reporting requirements by foreign exchange bureaus to BSL and FIU - Licenses procedure should include adequate fit and proper test for owners - Declaration of activity and proof of source of funds in line with Sec 38 of the AML/CFT Act, 2012.	BSL (Lead Agency), FIU	- Risk-based reporting requirements adopted in form of enforceable regulations with effective & dissuasive penalties for non-compliance - Improved licensing procedures adopted by BSL in the form of enforceable regulations, together with clear fit-and-proper requirements specifically tailored for remittance sector	DEC 2018	Adopt guidelines, policies and regulations
Enforce adequate CDD and KYC principles	Inadequate KYC procedure in dealing or establishing relationship with customers in the micro finance sub sector	•	- Supervisory authority to adopt risk-based, tailored & effectively enforceable AML/CFT regulations for micro-lending institutions that contain monetary penalties that can be effectively enforced to address non-compliance - Supervisory authority to adopt risk-based internal AML/CFT inspection procedures	BSL, FIU	- Risk-based, tailored & effectively enforceable AML/CFT regulations for micro-lending institutions that contain monetary penalties that can be effectively enforced to address non-compliance, adopted by supervisory authority - risk-based internal AML/CFT		Adopt guidelines, policies and procedures

			tailored to micro-lending sector - Supervisory authority adopts risk-based AML/CFT inspection plan & schedule - Supervisory authority implements system to collect & maintain data on results of AML/CFT compliance inspections of micro-lending sector including: (a) # of inspections carried out; (b) type & # of compliance violations; (c) type, # & value of monetary penalties imposed.		inspection procedures tailored to micro-lending sector adopted by Supervisory authority - risk-based AML/CFT inspection plan & schedule adopted by supervisory authority - Supervisory authority to provide quarterly statistics to FIU on: (a) # of inspections carried out; (b) type & # of compliance violations; (c) type, # & value of monetary penalties imposed.		
DNFPB Sectors							
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Clampdown on the illicit trade in minerals	Diamond sector: Illicit trade of precious stones and minerals	•	Identify appropriate supervisory body to design & implement adequate AML/CFT controls applicable to diamond sector (if FIU is responsible supervisory body, then identify the	FIU/NMA/MMMR(Lead Agency) ACC, SLEITI ,	- Risk-based AML/CFT controls tailored to ML/TF risks in diamond sector adopted - Amendments adopted addressing the missing or inadequate legal/regulatory	DEC 2019	- Allocate resources both human and materials - Formulate policies and regulations

			responsible FIU person to coordinate the design & implementation of AML/CFT controls in diamond sector) • Designated supervisor to analyze existing law to identify missing or inadequate legal framework provisions on which to build AML/CFT supervision system for the diamond sector • Supervisor to: (a) ensure the drafting, deliberation & adoption of risk-based legal & regulatory frameworks/amendments; (b) adopt risk-based compliance inspection procedures tailored to the diamond sector; (c) adopt risk-based plan & schedule for compliance monitoring; (d) maintain statistics on results of compliance inspections (ie., # of inspections, results of inspections, #/type of sanctions imposed, etc • FIU/NMA have formal engagement with the registered diamond dealers, exporters and		framework for AML/CFT compliance monitoring of diamond sector • Legal/regulatory framework for AML/CFT compliance in diamond sector effectively implemented • Risk-based AML/CFT inspection procedures adopted by supervisory authority • AML/CFT inspection procedures of diamond sector have commenced • Supervisor maintains statistics on results of compliance inspections of diamond sector. • To minimize incidence of illicit trade in precious stones and minerals • To minimize cases of smuggling at various border entry points.		
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			miners to enhance AML/CFT reporting requirements • THE FIU/NMA, CAC AND Officer Administrator and Register General to get a round table major stakeholders discussion on the definition of Beneficiary Ownership and inclusion of beneficiary owners on the forms of registration of companies. • Enhance domestic cooperation between the FIU and NMA's Mines Monitoring Officers(NMO) with the responsibility to provide effective monitoring and reporting on the diamond dealings/trafficking activities at the border-crossing points. • Provide comprehensive training of the MMO/Miners Wardens(MW) so to oversee adoption and implementation of the AML/CFT requirements		• To ensure effective supervision and monitoring of the minerals sector		
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			• The MMO/Mines Warden salary be reviewed so as not to undermine its capacity to play its monitoring and reporting role. • Enhance the capacity of National Minerals Agency to crack down on the illicit trade in precious minerals and stones • Capacitate custom, border guards and airport authorities to identify and crackdown on the smuggling of precious minerals and stones • Enforce strict beneficial ownership disclosure requirements for the precious minerals sector				
Roll out and maintain AML/CFT compliance	<u>CAR DEALERS SECTOR</u> Absence of effective AML/CFT supervision of sector	•	• Identify appropriate supervisory body to design & implement adequate AML/CFT controls applicable to sector (if FIU is responsible supervisory body, then identify the responsible FIU person)	FIU SLRSA	• Risk-based AML/CFT controls tailored to ML/TF risks in sector adopted • Amendments adopted addressing the missing or inadequate legal/regulatory framework for	DEC 2019	• Formulate policies and regulations • Set up or assign supervisory authority

			to coordinate the design & implementation of sector AML/CFT controls) • Designated supervisor to analyze existing law to identify missing or inadequate legal framework provisions on which to build tailored AML/CFT supervision system for sector • Supervisor to: (a) ensure the drafting, deliberation & adoption of risk-based legal & regulatory frameworks/amendments; (b) adopt risk-based compliance inspection procedures tailored to sector; (c) adopt risk-based plan & schedule for compliance monitoring; (d) maintain statistics on results of compliance inspections (ie., # of inspections, results of inspections, #/type of sanctions imposed, etc) • To amend Part II Second Schedule of the AML/CFT Act, 2012 to designate car dealers as part of		AML/CFT compliance monitoring of sector • Legal/regulatory framework for AML/CFT compliance in sector effectively implemented • Risk-based AML/CFT inspection procedures adopted by supervisory authority • AML/CFT inspection procedures of sector have commenced • Supervisor maintains statistics on results of compliance inspections of sector.		
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			reporting entities related Designated Non-Financial Businesses and Professions(DNFBPs) • FIU to be made a temporary body supervising car dealers with immediate effect, 2017.				
Roll out and maintain AML/CFT compliance	<u>Legal Professionals/Lawyers</u> Absence of effective AML/CFT control systems of sector	•	• Identify appropriate supervisory body to design & implement adequate AML/CFT controls applicable to sector (if FIU is responsible supervisory body, then identify the responsible FIU person to coordinate the design & implementation of sector AML/CFT controls) • Designated supervisor to analyze existing law to identify missing or inadequate legal framework provisions on which to build tailored AML/CFT supervision system for sector • Supervisor to: (a) ensure the drafting, deliberation & adoption of risk-based	FIU/GLC	• Risk-based AML/CFT controls tailored to ML/TF risks in sector adopted • Amendments adopted addressing the missing or inadequate legal/regulatory framework for AML/CFT compliance monitoring of sector • Legal/regulatory framework for AML/CFT compliance in sector effectively implemented • Risk-based AML/CFT inspection procedures adopted by supervisory authority • AML/CFT inspection procedures of sector have commenced	DEC 2018	• Draft and adopt memorandum of understanding • Formulate policies and guidelines

			legal & regulatory frameworks/amendments; (b) adopt risk-based compliance inspection procedures tailored to sector; (c) adopt risk-based plan & schedule for compliance monitoring; (d) maintain statistics on results of compliance inspections (ie., # of inspections, results of inspections, #/type of sanctions imposed, etc) • FIU to engage with the General Legal Council (GLC) on their comments in response to FIU's AML/CFT reporting guidelines.		• Supervisor maintains statistics on results of compliance inspections of sector.		
1.	Accountants/Auditors Sector Absence of effective AML/CFT control systems of sector	•	• Identify appropriate supervisory body to design & implement adequate AML/CFT controls applicable to sector (if FIU is responsible supervisory body, then identify the responsible FIU person to coordinate the design & implementation of sector AML/CFT controls) • Designated supervisor to analyze existing law	FIU& ICASL	• Risk-based AML/CFT controls tailored to ML/TF risks in sector adopted • Amendments adopted addressing the missing or inadequate legal/regulatory framework for AML/CFT compliance monitoring of sector • Legal/regulatory framework for AML/CFT compliance in sector	DEC 2019	

			to identify missing or inadequate legal framework provisions on which to build tailored AML/CFT supervision system for sector • Supervisor to: (a) ensure the drafting, deliberation & adoption of risk-based legal & regulatory frameworks/amendments; (b) adopt risk-based compliance inspection procedures tailored to sector; (c) adopt risk-based plan & schedule for compliance monitoring; (d) maintain statistics on results of compliance inspections (ie., # of inspections, results of inspections, #/type of sanctions imposed, etc)		effectively implemented • Risk-based AML/CFT inspection procedures adopted by supervisory authority • AML/CFT inspection procedures of sector have commenced • Supervisor maintains statistics on results of compliance inspections of sector.		
FINANCIAL INCLUSION							
OBJECTIVE	IDENTIFIED ISSUES	SECTOR	PROPOSED MEASURES/ACTIONS	MAIN ACTORS (LEAD* AGENCY)	RESULTS/OUTPUTS	PROPOSED TIMEFRAME	RESOURCES/REQUIREMENTS
Increase d access to financial services	Lack of National Financial Inclusion Strategy	•	• Adoption of National Financial Inclusion Strategy • FIU to coordinate drafting & adoption of risk-based,	NATCOM/ BSL Mobile Network Operators	• National Financial Inclusion Strategy adopted • Adoption of legal/regulatory framework for risk-	DEC 2018	• Innovation in financial products and services • Increased resources

			enforceable legal framework for supervision & compliance monitoring procedures for adoption of effective regulatory AML/CFT controls for financial inclusion products/services		based supervision & compliance monitoring of AML/CFT controls related to financial inclusion products/services		allocation to trade and investment
Ensure adequate compliance	Lack of proper due diligence on third party cash-in cash-out transactions schemes.	•	• Mobile Networks providing financial services to update customers profile to ensure that the KYC on users of mobile money are accurate. • Third parties cash out transaction above specified threshold should require minimal KYC information	NATCOM/BSL Mobile Network Operators	• Cash and cash out transactions but be recorded and third parties (Non-user of mobile money) be properly identified	DEC 2019	• Draft and roll out guidelines • Formulate policies and regulations
Ensure legal framework to deter cyber crime	The absence of cyber crime legislation exposes technology driven financial services to abuse and further exposes many users to possible fraud and money laundering.	•	• There should be a legislation on cyber Crime	• Ministry of Information (Lead Agency) - SLP, FIU, NATCOM	• Criminalise cyber crime to safeguard victims of cyber criminality that is linked to technology driven financial services products.	DEC 2019	• Enact laws • Formulate policies and regulations
Effective compliance with KYC/CDD	Low level financial literacy among RFIs clients and absence of proper identification for the conduct of	•	• The regulatory framework on AML/CFT for RFIs should be tailored to the environment in	• Bank of Sierra Leone(Lead)	• Promote financial literacy and ensure that KYC/CDD implementation are risk sensitive.	DEC 2019	• Roll out guidelines • Formulate policies

principle	adequate KYC/CDD.		which the RFIs operates and simplified KYC/CDD procedure. - Promote financial literacy in the rural sector. - Rollout limited AML/CFT Supervision for RFIs	Apex Bank	Monitor the implementation of required minimum AML/CFT standards		and regulations
Effective AML/CFT Compliance	Inadequate vetting procedure for Investors in the microfinance sector	•	Undertake fit and proper test on Investors wishing to invest in microfinance through APEX Bank	BSL, APEX BANK	•		- Draft and adopt guidelines - Formulate policies and regulation
Ensure effective compliance with KYC/CDD principles	Absence of a risk assessment framework to certify product and services as low risk and to permit the use of simplified KYC/CDD measures and other AML/CFT control measures relating to low risk products and services	•	- Develop a financial product assessment tool that will be used to assess all products in terms of risks to money laundering and terrorism financing. - BSL and other Financial Services Regulatory bodies to incorporate into their existing product approval conditionality, the requirement for money laundering and terrorism		Tools to enable financial institutions to determine whether financial product can be treated as low risk and require the implementation of simplified AML/CFT measures	DEC 2019	- Draft and adopt guidelines - Formulate policies and regulations

			financing risk assessment.				
Develop and promote financial inclusion	Lack of amenable regulatory space for financial inclusion products to thrive in Sierra Leone	•	Develop a comprehensive financial inclusion strategy that will promote access to finance, deepen inclusion and address financial literacy	MoFED BSL FIU UNCDF	To increase the rate of financial inclusion in Sierra Leone	DEC 2019	- Policy and strategy formulation - Increased resource allocation to research and development
Develop ment centraliz ed database	Lack of comprehensive database for financial inclusion statistics to help in research and policy formulation in relation to financial inclusion	•	Develop data collation tool for financial inclusion statistics.	BSL (Lead Agency), SSSL	Accessible data base on financial inclusion statistics	Dec 2018	- Acquire computer hardware and software application - Capacity building in training and development
Effective impleme ntation of the risk based approach	The importance of linking AML/CFT control obligations to the Financial Inclusion strategy to ensure risks are controlled effectively but not overly controlled	•	AML/CFT regulations for financial inclusion products & services to be joint developed by the FIU and BSL who is responsible for implementing the Financial Inclusion strategy.	BSL, FIU (Lead Agency)	Implementation of financial inclusion strategy	Dec 2017	- Formulate policies and strategies - Regulations for financial products and services
Effective regulatio n of mobile money	Inadequate regulation and supervision of Mobile money services	•	- NATCOM to regularly update the user database of registered users and share with FIU, BSL and TOCU. - NATCOM to impose proportionate and	NATCOM	Strengthen the supervisory arm of NATCOM to monitor and supervise the activities of mobile money in collaboration		- Draft and adopt guidelines - Formulate policies and regulations

			dissuasive sanctions on telecommunication companies for non-compliance with registration of sim cards and other breaches of operating standards. • NATCOM to enforce enhanced KYC/CDD for Agents and Super Agents and simplified identification procedure for third party users		with BSL		
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