

# THE DIPLOMA IN COMPLIANCE, AML & FINANCIAL CRIME (MIDDLE EAST)



I C M A  
C E N T R E



The Diploma in Compliance, AML & Financial Crime has been developed by CCL Academy in association with the ICMA Centre, Henley Business School, University of Reading. CCL and the ICMA Centre have been running Compliance and AML qualification programmes successfully in the United Arab Emirates since 2011, attracting participants from across the Middle East, as well as Africa.

This Diploma programme has been designed for compliance and AML / financial crime professionals with between one and five years' experience in compliance or AML / financial crime. Exceptions may be made in respect of applicants who have significant regulatory experience or similar experience in legal, audit, risk or other related functions.

Our approach is unique. You will be guided through the Diploma by seasoned compliance and financial crime practitioners who combine an understanding of the learning process as well as significant industry experience gained as senior Compliance Officers, Money Laundering Reporting Officers (MLROs) and Head of Compliance and Financial Crime Learning in major financial institutions.

The Diploma consists of four modules totalling twelve days of interactive workshop learning, interspersed by examinations and assignments.

## MODULES:

**Key Compliance Skills**

**Key AML & CTF Skills**

**Compliance Culture, Conduct & Governance**

**Key Financial Crime Risks**

Each course can be taken as a standalone module or as part of the whole Diploma.

## MODULE: KEY COMPLIANCE SKILLS

Good compliance involves knowing the rules, the markets, products and transactions, but it also relies on being able to develop the ability to make swift recommendations based on a robust, reasoned argument. The ability to deal with individuals at all levels of your organisation is central to this, from those in client and market-facing positions to those sitting in the boardroom. This module will demonstrate techniques for developing or enhancing such an approach within the context of realistic business scenarios and will discuss how to achieve a best in class approach to developing a compliance function.

The module will then explore Compliance Monitoring - something that is easily done badly and is difficult to do well. We will demonstrate how to conduct compliance monitoring in a way which will be compelling to regulators, senior management and auditors alike.

### The World-Class Compliance Function

- What is compliance and how do we make it truly effective?
- Who is responsible for compliance
- Compliance governance
- The independence of compliance
- The compliance programme and the compliance function
- The future of FinTech and what it means for compliance

### Influencing and Negotiation Skills for Compliance Officers

- The areas of a senior Compliance Officer's work in which influencing and negotiation skills are required
- Key tips and techniques - using realistic scenarios
- *Exercise: Apply these techniques in further scenarios*

### Identifying and Managing Conflicts of Interest

- What is a conflict of interest?
- Where can conflicts arise in my firm?
- Whose responsibility is it to identify and manage conflicts of interest?
- What should Compliance be doing to spot potential conflicts?
- What practical techniques can Compliance use to manage conflicts of interest successfully?
- *Case studies: Extensive real-life examples from the trainer's own experiences*

### Compliance Risk and Monitoring

- What is compliance risk?
- *Group exercise: How to construct a compliance risk matrix*
- Recent changes in the approach to monitoring
- Monitoring crimes - how teams get it wrong
- How to construct a risk-based compliance monitoring programme
- Surveillance systems - build or buy?
- *Group exercise: Directional testing techniques*
- *Group exercise: Devising the right monitoring tests*

## MODULE: KEY AML & CTF SKILLS

Anti-Money Laundering issues tend to be amongst the most difficult facing a Compliance Officer. You need to be seen to support the business in key decision-making, whilst ensuring that the firm's reputation and regulatory risk are managed appropriately. This module will take participants through the risk-based approach, both generally for the firm (the Business Risk Assessment) and in respect of specific customers (the Customer Risk Assessment). Participants will look at both the present and the future to see how financial crime is changing and how they and their firms need to react to a more digital and challenging age.

### Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) Issues

- The more challenging AML issues facing a senior compliance and AML professional
- Advantages and disadvantages of having AML and Compliance under the same reporting line
- Techniques for the grey areas of AML compliance and how to work with management to achieve consensus
- Commercial pressures managers face in addressing AML issues
- *Case studies: Real-life examples*
- *Group discussion: Business initiative involving high AML risk - how would you advise management?*
- Developing an AML risk assessment and presenting your findings to management

### Building a Risk-Based CDD Process

- AML & CTF update
- Offences & penalties
- The Risk-Based Approach
- Business Risk Analysis (BRA)
- *Exercise: Construct a BRA for your firm*
- Customer Risk Assessment (CRA)
- *Exercise: Assign risk ratings to three potential clients*
- Customer Due Diligence (CDD)
- Recognising & reporting suspicious activity
- *Case studies: Real-life examples*

### The Future of Financial Crime Compliance

- Actual and emerging best practice, incorporating FATF, Wolfsberg and Egmont
- Other risk areas, including real estate, high value goods, financial free zones
- Current global developments including crypto currency, Unexplained Wealth Orders (UWOs), tax evasion, growing pace of legislation

**MODULE: COMPLIANCE CULTURE,  
CONDUCT & GOVERNANCE**

So much emphasis since the Global Financial Crisis has been placed not just on the risks posed by a firm's business model, but also on how the business is conducted. This module will address what good compliance culture, conduct and governance look like and how Compliance can work with senior management to embed the right systems and controls, governance and conduct risk. Using case studies and real-life examples from the tutor's experiences, participants will learn how to challenge their firms' strategy and how business is conducted.

**Dealing with Business and Management**

- What management need to bring to the compliance programme
- How to deal with business and management in challenging areas
- *Role play: Techniques for influencing business and management in areas of disagreement*
- How to build good working relationships with different types of manager
- Codes of ethics and expressions of corporate values - how does one make them effective and define the parameters of acceptable conduct with business and management?
- How to bypass business management and go straight to senior management, but still work effectively with the same people afterwards
- How to work through situations where disagreement is so fundamental that you consider resignation

**Compliance Culture and Conduct**

- What do we mean by "Compliance Culture"?
- Who are the stakeholders and why is this important to them?
- Regulators' and other stakeholders' interest in culture
- How the right compliance culture leads to the right conduct
- The meaning of conduct risk
- What does this mean for a regulated business?

**Implementing Corporate Governance**

- Principles of corporate governance
- Roles and responsibilities
- Decision-making in an effective governance structure
- Risk management and governance
- Monitoring performance in a governance structure
- *Case study: Governance in practice*

**Communicating Compliance**

- The importance of communicating compliance at all levels
- Different styles of compliance training
- Introducing creativity into your training
- Key tips for compliance presentations
- *Role play: How these tips can be used in practice*

**MODULE: KEY FINANCIAL CRIME RISKS**

Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) are important areas of financial crime, but it is important not to neglect other areas, such as sanctions, bribery, corruption and fraud. This module examines these other types of financial crime and leads participants through fraud and bribery & corruption risk assessments. Sanctions are not ignored, as these have been shown to attract severe enforcement action from regulators in many countries of the world, most notably the United States.

**Trade and Economic Sanctions**

- Why do financial institutions have to devote resources to ensure compliance with trade and economic sanctions regulations and laws?
- How financial institutions breach relevant trade and economic sanctions regulations
- The consequences of breaches of relevant trade and economic sanctions regimes
- Review of specific sanctioned regimes
- What we can learn from reported enforcement actions
- How financial institutions can reduce the risk of non-compliance with relevant sanctions
- What to do if you are the subject of an investigation
- The practicalities of dealing with an investigation

**Fraud Prevention**

- The impact of fraud on an institution
- How fraud can arise
- Controls against fraud
- Can you monitor to detect fraud?
- The importance of whistleblowing procedures
- Developing a fraud risk assessment

**Anti-Bribery and Corruption**

- How to assess your bribery and corruption risk
- The importance of your Code of Ethics
- Controls over suppliers - to centralise or not to centralise?
- Gifts, entertaining and conflict registers
- *Case studies: what to do in difficult jurisdictions*
- How to develop an ABC risk assessment

**ASSESSMENT METHODOLOGY**

Each module will culminate in a practical assessment of the participant's understanding of the topics taught. The assessments will consist of short answer and multiple-choice questions; a 1,500 word assignment and a viva-style assessment.

A pass mark of 70% will be required for the participant to be awarded the Diploma.

## THE TUTORS >

### **PETER HAINES** Group Head of GRC Training

Peter has over thirty years' experience in the field of regulation and compliance. A chartered accountant, Peter spent six years working with the UK's SFA (now the FCA) and has headed up regional and global compliance functions at Paribas, UBS Investment Bank and Bank of America. In 2006, he set up his own consultancy firm, specialising in providing general regulatory, governance and compliance advice and training to banks, brokers, hedge fund managers, compliance officers and regulators.

Peter combines his experience as a consultant, trainer, published author and former non-executive director with his extensive knowledge gained from the industry. As Group Head of GRC, he works closely with our clients to ensure that our programmes are tailored to their exact needs and meet, or surpass, their expectations.

### **BRUCE VINEY** Group Head of Financial Crime Compliance

Bruce Viney has been working in financial services for more than 30 years, 25 of these as a learning professional focusing on Banking Compliance, mainly through the analysis, design, creation and implementation of global training programmes for Tier 1 Banks and FTSE 100 companies. Bruce has been Global Head of Compliance Learning for such firms three times and has provided compliance learning consultancy to similar companies many times.

A former Director of Training for the CISI, Bruce has extensive experience of compliance and banking related qualifications and is himself a Chartered Accountant, having qualified with Price Waterhouse (as it was then known).

## **ABOUT CCL ACADEMY...**

We are a specialist Governance, Risk and Compliance (GRC) training company and have been training financial services firms on their regulatory compliance obligations for over 30 years.

## **WHY SHOULD YOU CHOOSE CCL ACADEMY FOR YOUR GRC TRAINING?**

Our extensive team of highly experienced Compliance and Financial Crime Compliance (FCC) professionals have decades of experience working in these functions at senior levels. They are passionate about their subject and are expert at imparting their knowledge and engaging their participants.

In addition to our range of introductory courses and practical, skills-based workshops, we are also able to offer a range of certificate and qualification programmes from introductory level, endorsed by the Chartered Institute for Securities & Investment (CISI), through to our diploma programmes in partnership with Henley Business School and the ICMA Centre.

## **HOW CAN WE HELP YOU AND YOUR FIRM?**

Whether you require skills training for your Compliance and AML/FCC teams or introductory training for all your staff, we have a range of effective training solutions to help:

**Regular public courses:** just one or two staff to train? Most of our key programmes are included in our public training schedule in Dubai.

**In-house training:** when you have a group to train or you need a bespoke course for your Firm.

**eLearning:** off the shelf and customised solutions: we have a library of eLearning modules, as well as customised material written by our in-house subject matter experts.