

National Anti-Money Laundering/ Counter-Terrorist Financing Risk Assessment as a Partial Tool for Creditor's Protection¹

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Abstract. *This paper deals with a national risk assessment. The subject of the risk assessment is money laundering and the financing of terrorism. This is the first time it has been conducted in the Slovak republic. The contribution shows what are the decisive criteria in evaluating the national system of terrorism financing. The first variable that needs to be taken in account is the number of cases. The second variable is the qualitative aspect of the cases. The competency of the personnel constitutes the third variable. The infrastructure generates a fourth variable in order to prevent, avoid and respond such a threat. The other variables are strongly related to the directions and channels of the terrorism financing. The infrastructure belongs to the category of other variables. The paper also deals with data sources and lists those that should be used as a source for further evaluation. The outcome of the NRA will be a comprehensive report.*

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1. Introduction

The main objectives of the anti-money laundering (AML) and counter-terrorist financing (CTF or TF) risk assessment² are to identify³ the vulnerability of each of the (relevant) businesses and professions that make up the country's financial sectors and designated non-financial businesses and professions, to further identify businesses/professions of high vulnerability and identify, on a needs basis, the products/services offered by the businesses/professions with high ML/TF vulnerability and to prioritise the action plans that will strengthen anti-money laundering controls (AML/TF controls) in the sectors. The outcome of the Terrorism Financing and Money Laundering Risk Assessment should be used to inform policy measures and improve data collection. ML and TF cases may take a long time to investigate, prosecute, and adjudicate. Furthermore, the number of terrorist

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² FATF Methodology FATF, 2013 p. 6. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

³ Acc. FATF National Moneylaundering and Terrorist Financing Risk Assessment, FATF, 2013 p. 3. *Electronic source:* <http://www.fatf-gafi.org/publications/methodsandtrends/documents/nationalmoneylaunderingandterroristfinancingriskassessment.html>,

financing convictions is often low in many jurisdictions. It is therefore advised to use, if possible, data from the past ten years in their analysis. Considering that in many countries CTF regimes have only recently been adopted, data collection periods will also depend on the availability of the data.⁴

To conduct such an assessment the following list provides sources that can be used for completing the assessment:⁵

- Statistics (national and international)⁶
- Intelligence
- Interviews with relevant authorities/interest groups/market participants⁷
- Focus group meetings with relevant authorities/interest groups/market participants⁸
- Surveys of the general public or focus groups⁹
- Reports by international organisations (e.g., United Nations, World Bank Group, International Monetary Fund, World Customs Organization, and World Trade Organization)
- Reports by international standard-setting bodies (e.g., Financial Action Task Force and FATF Style Regional Bodies)
- Reports by governments/think-tanks/civil society organisations/private institutions¹⁰
- Books/articles/reports based on academic research
- Press/internet/other sources of public information.

⁴ Inter alia Acc. 1. Recommendation of the FATF recommendation, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf. Also see: FATF Methodology FATF, 2013 p. 6. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>,

⁵ Acc. FATF National Moneylaundering and Terrorist Financing Risk Assessment, FATF, 2013 p. 13–16. *Electronic source:* <http://www.fatf-gafi.org/publications/methodsandtrends/documents/nationalmoneylaunderingandterroristfinancingriskassessment.html>, FATF Methodology FATF, 2013 p. 23–25. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

⁶ Inter alia Acc.recommendation 33 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

⁷ Inter alia Acc.recommendation 33 and 34 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

⁸ Inter alia Acc.recommendation 33 and 34 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

⁹ Inter alia Acc.recommendation 33 and 34 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

¹⁰ Inter alia Acc.recommendation 33 and 34 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

2. AML Risk Assessment

This assessment applies to each relevant product within the financial sector and business sector and profession within the non-financial sector as *DNFBP*. This means that all the firms and individuals in the assessed business/profession need to be assessed together per business/profession type. The AML control variables are as follows:¹¹

- Total size/volume of the business/profession
- Client-base profile of the business/profession
- Level of cash activity associated with the business/profession
- Other vulnerable factors, including
 - Non-face-to-face engagement of services and ongoing relationship
 - Use of agents
 - Anonymous use of the product
 - Difficult to trace transactions (e.g., use of pooled client trust accounts; professional secrecy laws or ethics rules; attorney/client privilege; legal/professional privilege and work [document]/product privilege)
 - ML typologies on the abuse of the business/profession
 - Use of the business/profession in fraud or tax evasion schemes
 - Other relevant features (specify up to three).
- Comprehensiveness of AML Legal Framework
- Effectiveness of Supervision/Oversight Activities
- Availability and Enforcement of Administrative Sanctions
- Availability and Enforcement of Criminal Sanctions
- Availability and Effectiveness of Entry Controls
- Integrity of Business/Profession Staff
- AML Knowledge of Business/Profession Staff
- Effectiveness of Compliance Function (Organisation)
- Effectiveness of Suspicious Activity Monitoring and Reporting
- Availability and Access to Beneficial Ownership Information
- Availability of Reliable Identification Infrastructure
- Availability of Independent Information Sources.

Total size/volume/number and turnover of the product/business¹²

This variable assesses the total number of a particular product provided by the assessed business/profession (if applicable). The total number of a particular

¹¹ Acc. FATF National Moneylaundering and Terrorist Financing Risk Assessment, FATF, 2013 p. 13–16. *Electronic source:* <http://www.fatf-gafi.org/publications/methodsandtrends/documents/nationalmoneylaunderingandterroristfinancingriskassessment.html>.

¹² Inter alia Acc.recommendation 1,10 and 11 of the FATF recoomendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf and FATF Methodology FATF, 2013 p. 13,132. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

product may be indicative of the level of ML vulnerability that this product can introduce into the assessed business/profession (if the relevant risks are not mitigated). The actual number of the product provided may be very difficult to determine. What is required is a judgement as to whether or not the scale of the number of the product provided is significant in the assessed country's economy. The objective of this indicator is to assess the importance of a particular product within the business/profession in comparison to other products offered by the business/profession. The most appropriate indicator of the total number of a product in the business/profession depends on the nature of the product being assessed. For some products, the number of transactions, number of clients, number of products created or administered associated with the product can be used as an indicator of the total number of product provided. For example, for real estate agents, the number of properties bought and sold on behalf of clients; for trust service providers, the number of express trusts (product) formed and/or administered (service); for company service providers, the number of legal persons formed (by type of legal person), managed or served as professional nominee shareholders or directors. This variable also includes the total number of providers (firms and individuals) in the business/profession. This information is taken to be indicative of the level of ML vulnerability that they can introduce into the business/profession (if the relevant risks are not mitigated). For some categories (especially unregulated ones), the actual number of providers may be difficult to determine. In that case, what is required is a judgement as to whether or not the providers are significant to the country's economy. The most appropriate indicator of the total number of providers within the business/profession depends on the nature of the product being provided. In other words, if the country licenses company service providers, but unlicensed company services firms or individuals are also permitted to provide such services, efforts should be made to ascertain (even if only a best estimate) the number of both licensed and unlicensed providers. For lawyers and other professionals, consider only the number of those that provide financial intermediary services. If the country is not able to identify the number of providers this may itself indicate a problem.

Possible sources

Data on total number products and providers (firms and individuals, licensed and unlicensed) within the assessed business/profession¹³ may be sourced from:

- Interviews/consultations with a regulatory/supervisory authority (e.g., self-regulatory bodies (SRBs) or other competent authority)
- Interviews/consultations with assessed business/profession's representatives, including an SRB and professional associations
- Surveys of management and staff of firms that make up the assessed business/profession
- Interviews with and data compiled by private sector research or consulting firms.

¹³ Inter alia Acc.recommendation 1,10 and 11 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf and FATF Methodology FATF, 2013 p. 13,132; *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

It needs to be considered also whether the particular product can be provided in the jurisdiction only by licensed businesses or professionals, or is permitted to be provided by “informal” or unlicensed firms and individuals (including informal trustees such as friends and family who serve as trustees of wills/estates or a business providing company secretarial services without a need for licensing as such); and/or are not permitted within the jurisdiction, but the product is being provided by “informal” or unlicensed firms and individuals (because of lack of clarity in the laws or regulations or lack of effective enforcement against unlicensed firms or individuals).

Client-base profile of the business/profession¹⁴

This variable assesses whether the type of client that generally uses the product or the business/profession being assessed increases the risks of money laundering abuse of the assessed product or business/profession. The term “client” here may refer to natural persons or legal persons or arrangements; it may also include end-users of the business/profession or professional intermediary firms through which products are provided to the end-users. All forms of clients should be considered in the assessment. The client-base profile of the business/profession should be assessed to carry a higher risk if it involves:

- Domestic/international politically exposed persons (PEPs)
- High net-worth individuals
- Non-resident clients, particularly from high-risk jurisdictions
- Clients with foreign business or personal interests
- Clients with business links to known high-risk jurisdictions
- Clients with criminal records or past administrative and/or supervisory actions against them
- Clients that are legal entities or arrangements with a complex, opaque ownership and control structure (including layered ownership and control, multi-jurisdictional or involving high-risk jurisdictions)
- Clients obtained through introduced business, particularly from unregulated professional intermediaries or regulated PIs in jurisdictions with low AML controls (including customer due diligence (CDD) and record keeping, availability and timely access to beneficial ownership of legal entities and legal arrangements, licensing and supervision, and enforcement)
- Professional intermediaries in jurisdictions with low or no CDD requirements
- Professional intermediaries in high-risk businesses/professions in a country context.

While assessing the client-base profile for each product and business/profession, it needs to be assessed whether this business/profession is being used by clients who pose a higher ML risk, when compared to “standard” clients. These

¹⁴ Inter alia Acc.recommendation 10 and 11 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf and FATF Methodology FATF, 2013 p. 40–47; *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

high-risk clients will include, politically exposed persons (PEPs), non-residents, high net-worth individuals, opaque or complex legal structures, and so on.¹⁵

To assess this variable, one should determine if the assessed product and business/profession has put in place appropriate mechanisms to identify and monitor high-risk individuals (including PEPs). If such monitoring/analysis mechanisms are not in place, the business/profession may not be able to provide such information. It needs to be the case that certain activities (including acting as financial intermediaries and incorporation services) require customer due diligence to be undertaken and this includes verification of the beneficial ownership of legal persons and legal arrangements. Thus, the financial institutions and DNFBPs should be able to identify non-resident clients, and determine which kinds of products they use. A more advanced analysis, based on the countries that such non-resident clients originate from, will provide further insight into the risk level. In some cases, the nature of the product will determine the client-base profile. For example the client-base profile of trusts would be high net-worth individuals. While assessing this indicator, it should be questioned how likely it is that this type of product or business/profession will be abused by criminals, compared to other products or businesses/professions in the sector.¹⁶ If the likelihood is high, the assessment rating for the client-base profile for this business/profession should be relatively strict. Assessment of this indicator will require judgement, unless the country has appropriate mechanisms for identifying and monitoring high-risk clients (including PEPs). If there is no data that can support the assessment, one should work on the basis of the worst-case scenario and be conservative in its assessment since the lack of ability to analyse the client-base profile will pose a risk in itself.¹⁷

Possible sources¹⁸

Possible sources include:

- Regulatory framework for risk-based classification of clients
- Regulatory framework for identifying and monitoring foreign and domestic PEPs
- Any product-related statistics on PEPs and other higher-risk clients
- Data on jurisdictions of origin of end-user clients and professional intermediary firms
- Financial sector and DNFBP sector data by business/profession on transactions with high-risk jurisdictions
- Data on clients obtained through introduced business
- Interviews/consultations with regulatory/supervisory authority (e.g., an SRB or other competent authority)

¹⁵ Inter alia Acc.recommendation 12 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf. and FATF Methodology FATF, 2013 p. 40–47; *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

¹⁶ Risk based approach.

¹⁷ Risk based approach.

¹⁸ FATF Methodology FATF, 2013 p. 40–47. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

- Interviews/consultations with assessed business/profession's representatives, including an SRB and professional associations
- Surveys of management and staff of firms that make up the assessed business/profession
- Interviews with and data compiled by private sector research or consulting firms
- Criminal data, including typologies on high-risk clients and ML cases where a business/profession was used for ML by high-risk clients
- Statistics on and information from the business/profession with regard to high-risk clients
- Statistics on the foreign jurisdictions where mutual legal assistance (MLA) or informal information sharing requests were received and sent by relevant authorities, including by supervisors, law enforcement, the Financial Intelligence Unit (FIU) and tax authorities.

Level of cash activity associated with the business/profession¹⁹

This variable assesses the level of cash activity associated with a specific business/profession, both whether the use of cash is permitted and to what extent that occurs. It assesses whether the use of cash is permitted for the business/profession and the level of cash associated with it. The more the business/profession being assessed is cash-based, the greater its vulnerability to money laundering.

Possible sources

- Interviews/consultations with regulatory/supervisory authority (e.g., an SRB or other competent authority)
- Interviews/consultations with assessed business/profession's representatives, including an SRB and professional associations
- Surveys of management and staff of firms that make up the assessed business/profession
- Interviews with and data compiled by private-sector research or consulting firms
- Criminal data, including ML cases where a business/profession was used for ML because of the possibility of transacting in cash (including payment of fees for service provided).

Other vulnerable factors of the business/profession Variable Description²⁰

This variable assesses whether there are any additional factors that render a particular business/profession vulnerable to the risk of money laundering. In terms

¹⁹ Inter alia Acc.recommendation 14,15 and 16 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

²⁰ Inter alia Acc.recommendation 14, 17, 24, 25 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

of the assessment criteria, the presence of the following typical factors may increase the ML vulnerability of the assessed business/profession:

- Use of agents²¹
- Possible anonymous use of the product in the business/profession²²
- Difficulty in tracing the transactions (including attorney/client privilege and professional secrecy for lawyers and accountants; work [document]/product privilege)
- Existence of ML typologies on the abuse of the business/profession
- Use of the business/profession in tax/fraud schemes
- Non-face-to-face interaction with the client.²³

For all of the above factors, it needs to be considered whether there is also an international dimension and how that may increase the vulnerability of the product or business/profession to ML risks. For example, ML typologies that involve transnational financial crime schemes and introduced business from professional intermediaries located in foreign jurisdictions.

Use of Agents: A further example of a vulnerability factor is the use of agents or other professional intermediaries to deliver the product. In this case, ML vulnerability may be increased due to the weak AML systems of the agents or professional intermediaries (including weak systems of the countries in which they operate or reside). To limit vulnerability, the agents or professional intermediaries should be subjected to adequate AML controls and monitoring/supervision by the principal of the financial institution or the business/profession in the country providing the product.²⁴

Possible anonymous use of the product in the business/profession: It should be assessed whether anonymous use of the product is possible for the assessed product or associated business/profession. Additionally, whether the beneficial owner of the transaction is always identified and verified needs to be considered. Does the business/profession allow for anonymous use (where a firm or an individual known to the assessed business/profession uses the product on behalf of several firms or individuals who are unknown to the business/profession)? Anonymous transactions are vulnerable to money laundering, as the beneficial owner(s) of the funds involved in the transaction is/are not known or are unverified. The transaction is executed for the client on behalf of others. The real owners are not known and hence not subjected to customer due diligence.²⁵

²¹ Inter alia Acc.recommendation 17 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

²² Inter alia Acc.recommendation 24 and 24 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf.

²³ Inter alia Acc.recommendation 17, 24 and 25 of the FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf.

²⁴ Acc. FATF Methodology FATF, 2013 p. 48. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>.

²⁵ *Ibidem.*

Difficulty in tracing the transaction records of the product or the business/profession: It should be assessed whether transactions executed in the course of delivery of a product by the business/profession are properly recorded and whether access to those records can be readily obtained for CDD/Enhanced due diligence (EDD). The difficulty in tracing the records would depend on the quality of the assessed business/profession's AML CDD and record-keeping systems. For example, the excessively broad application or misuse of professional secrecy and privilege provisions, which may also hinder timely access to relevant records by competent authorities.

Existence of ML typologies on the abuse of the product or business/profession means whether the business/profession is known for abuse for ML purposes. This does not necessarily need to be in the country context. It should be considered also at the global level, regardless of whether it was detected or not detected in the country.²⁶

Use of the business/profession in fraud or tax evasion schemes: Assess the use of the business/profession in fraud or tax evasion schemes or other predicate offences. For this purpose, it may be useful to refer to crime and tax enforcement data to find the businesses/professions that are most vulnerable to actual and potential misuse. The use of the business/profession in tax evasion or fraud schemes or other predicate offences may indicate a vulnerability to ML abuse as well.²⁷

Non-face-to-face use of the product or the business/profession: Availability of non-face-to-face initiation of a business relationship with respect to a product or a business/profession (or product) raises ML vulnerability. If an individual is able to secure the product via the internet or telephone with no face-to-face contact with the professional or business, there is ML vulnerability. Even in the cases where non-face-to-face initiation of a product is not allowed, but non-face-to-face use of the product is, there is a possibility of ML vulnerability. But in the second case, the vulnerability of the product can be less, depending on the quality of CDD/EDD done during the face-to-face product initiation and existence of other controls that limit the use of the product by persons other than the account holder.

Possible Sources of Information and Data²⁸

- Criminal data, including ML cases where a business/profession was used for ML, indicating vulnerability due to the above-mentioned factors
- Data or statistics and qualitative information from MLA and formal or informal requests from supervisory authorities, law enforcement, the FIU, and tax and other relevant authorities to share information/intelligence
- Interviews/consultations with regulatory/supervisory authority (e.g., an SRB) and other competent authorities
- Interviews/consultations with assessed business/profession's representatives, including an SRB and professional associations

²⁶ Acc. FATF National Moneylaundering and Terrorist Financing Risk Assessment, FATF, 2013 p. 43–44. *Electronic source:* <http://www.fatf-gafi.org/publications/methodsandtrends/documents/nationalmoneylaunderingandterroristfinancingriskassessment.html>

²⁷ *Ibidem.*

²⁸ FATF Methodology FATF, 2013 p. 49–54. *Electronic source:* <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology-March%202017-Final.pdf>

- Surveys of management and staff of firms that make up the assessed business/profession
- Interviews with and data compiled by private-sector research or consulting firms.

Conclusion

Identifying, assessing, and understanding ML/TF risks is an essential part of the implementation and development of a national anti-money laundering / countering the financing of terrorism (AML/CFT) regime, which includes laws, regulations, enforcement and other measures to mitigate ML/TF risks. It assists in the prioritisation and efficient allocation of resources by authorities. The results of a national risk assessment, whatever its scope, can also provide useful information to financial institutions and designated non-financial businesses and professions (DNFBPs) to support the conduct of their own risk assessments. Once ML/TF risks are properly understood, country authorities may apply AML/CFT measures in a way that ensures they are commensurate with those risks — i.e. the risk-based approach (RBA) — which is central to the FATF standards as is set out in Recommendation 1, its interpretive note (INR 1), as well as in other Recommendations (e.g., Recommendations 10, 26 and 28).

The outcome of the Money-laundering and Terrorist financing risk vulnerability assessment is necessary for:

- Designing action plans for more effective AML policies and practices in the sector
- Evaluating the impact of different interventions by regulatory (and other relevant) authorities
- Comparing the level of vulnerability of a business/profession in the DNFBP sector with other businesses/professions, and the vulnerability level of each of the assessed business/profession in relation to other financial sectors
- Ensuring efficient resource allocation
- Developing specific AML controls for high-risk businesses/professions in the DNFBP sector and their products.

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2. FATF recommendations, FATF, 2016. *Electronic source:* http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf.
3. FATF National Money laundering and Terrorist Financing Risk Assessment, FATF, 2013. *Electronic source:* <http://www.fatf-gafi.org/publications/methodsandtrends/documents/nationalmoneylaunderingandterroristfinancingriskassessment.html>.

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Streszczenie. Niniejszy artykuł poświęcony jest krajowej ocena zagrożenia, której przedmiotem jest pranie brudnych pieniędzy i finansowanie terroryzmu. To pierwszy raz, kiedy tego typu ocena została przeprowadzona w Republice Słowackiej. W artykule omówiono główne kryteria stosowane do oceny krajowego systemu finansowania terroryzmu. Pierwsza zmienna, którą należy uwzględnić, to liczba przypadków a druga — to ich aspekt jakościowy. Kompetencje personelu stanowią zmienną trzecią. Infrastruktura tworzy zmienną czwartą, ukierunkowana na zapobieganie, unikanie i reagowanie na tego typu zagrożenie. Inne zmienne są ściśle powiązane z kierunkami i kanałami finansowania terroryzmu. Infrastruktura należy do kategorii innych zmiennych. Ponadto, w niniejszym opracowaniu zajęto się również źródłami danych i ukazano te z nich, które powinny znaleźć zastosowanie przy dalszej ocenie. Efektem krajowej oceny ryzyka będzie przygotowanie obszernego i wyczerpującego raportu.

Резюме. Настоящая статья посвящена национальной оценке рисков. Предметом оценки риска являются отмывание денежных средств и финансирование терроризма. В Словацкой Республике такого вида оценка была проведена первый раз. В статье обсуждаются основные критерии, применяемые для оценки национальной системы финансирования терроризма. Первой переменной, которую необходимо учитывать, является количество случаев. Вторая переменная — это качественный аспект дел. Третья переменная — компетентность личного состава. Инфраструктура является четвертой переменной, направленной на предотвращение, избегание риска и реагирование на возникшую опасность. Другие переменные тесно связаны с направлениями и каналами финансирования терроризма. Инфраструктура относится к категории других переменных. Кроме того, в настоящей разработке описываются источники данных и перечислены те, которые должны использоваться для дальнейшей оценки. Результатом проведения национальной оценки рисков будет являться обширный и исчерпывающий отчет.

Translation: Mariola Bil (abstract), Małgorzata Jasińska (резюме)

