



Egmont Group Secretariat  
P.O. BOX 55015 Sparks Street  
Ottawa, ON K1P 1A1  
Canada  
Tel: (+1) 416 355 5670  
E-mail: [mail@egmontsecretariat.org](mailto:mail@egmontsecretariat.org)

## **Request for Proposal for a Consultant**

The Egmont Group Secretariat (EGS) is requesting proposals from suitable and qualified professional consultants who can provide their services by analyzing the results of specific Immediate Outcomes (IOs) of certain Mutual Evaluation Reports (MERs) approved by the Financial Action Task Force (FATF) between 2014 and 2019.

Further details on the scope of this work are provided below in this document. Proposals should contain information on the consultant's qualifications and years of experience in mutual evaluations, as well as the desired fee for the requested services.

### ***Background: The Egmont Group and the Egmont Group Secretariat***

The Egmont Group (EG) is a global organization of 164-member Financial Intelligence Units (FIUs) supported by the Egmont Group Secretariat (EGS) based in Ottawa, Canada. The EGS provides strategic, administrative and other support to the overall activities of the Egmont Group, the Egmont Committee (EC), the Working Groups (WGs) and the Regional Groups (RGs).

For more information about the EG and the EGS please visit [www.egmontgroup.org](http://www.egmontgroup.org)

### ***Introduction***

Based on what is stipulated in Procedural Trigger 3 of the *Support and Compliance Process (SCP)*, the EG reviews the findings related to FIUs in the Mutual Evaluation Reports (MERs) conducted by the AML/CFT assessor bodies and confirms that members comply with the Egmont Group Charter and the Egmont Principles of Information Exchange (both core and binding Egmont documents). Weak MER ratings<sup>1</sup> concerning a FIU do not result in an automatic finding of non-compliance, but rather serve as a trigger for **closer review** by the EG pursuant the SCP. One of the aspects to be reviewed is the effectiveness assessment in the

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<sup>1</sup> Partially compliant (PC) and Non-compliant (NC) for technical compliance assessment. Moderate level of effectiveness (ME) or low level of effectiveness (LE) for effectiveness assessment.

MERs within the following scope:

- a) MER Effectiveness Assessment rating of Low Level of Effectiveness (fundamental improvements needed) or Moderate Level of Effectiveness (major improvements needed) for Methodology **Immediate Outcome 2 (IO.2)** where it is clear that this rating can be attributed to the FIU; and
- b) MER Effectiveness Assessment rating of Low Level of Effectiveness (fundamental improvements needed) or Moderate Level of Effectiveness (major improvements needed) for Methodology **Immediate Outcome 6 (IO.6)** where it is clear that this rating can be attributed to the FIU.

It is recognized that not all moderate or low ratings relate specifically to FIUs in the MERs, given that the IOs consider the whole AML/CFT framework (noting the FIU is just one part, albeit a considerable one in IO.6). As such, the review of the MER as it relates to IO.2 and IO.6 must be focused on the deficiencies attributed to the FIU. Ultimately, the FIU must have been deemed to have played a part in the jurisdiction being rated with moderate or low effectiveness levels in these IOs for them to be subjected to the Effectiveness Trigger.

There are 63 MERs from Egmont Member jurisdictions approved by the FATF/FSRBs from 2014 to 17 April 2019. From an effectiveness perspective of these 63 MERs, 22 MERs have weak ratings for IO.2 and 41 MERs have weak ratings for IO.6. Therefore, there is a total amount of 45 MERs to be preliminary reviewed under the MER effectiveness trigger of the SCP.

### ***Description of the Required Job***

The hired consultant will review the narrative of the 22 weak IO.2 ratings and the 41 weak IO.6 ratings (in the 45 MERs). This review must be conducted against the following benchmarks established in the SCP for the effectiveness trigger in order to identify those which are related to FIU shortcomings:

- a) The FIU does not receive reports with relevant and accurate information to properly perform its functions;
- b) The FIU cannot obtain on a timely basis the widest possible range of financial, administrative and law enforcement information;
- c) The FIU does not disseminate analytical results effectively supporting the operational needs of competent domestic authorities;
- d) The FIU does not effectively and securely cooperate and exchange information with other competent domestic authorities;
- e) The FIU does not effectively seek information/cooperation from foreign counterparts by requesting intelligence and other information in support of its analyses;
- f) The FIU does not provide intelligence and other information in a constructive and timely manner to foreign FIUs in support of their analyses;
- g) The FIU does not provide and respond to foreign requests for co-operation in identifying and exchanging basic and beneficial ownership information of legal

persons and arrangements;

- h) The FIU places unreasonable or unduly restrictive conditions on exchanging information or providing assistance;
- i) The FIU does not protect the security and confidentiality of information exchanged with counterparts.

In determining whether the effectiveness benchmarks set out above are met, the following elements must be taken into consideration by the consultant:

- The narrative of MERs under the evaluation of IO.6 and IO.2as relevant to describe and assess the FIU's role in determining the conclusions of effectiveness;
- The recommendations formulated in the MER to take account of the identified deficiencies in effectiveness matters as they relate to the FIU.

The Consultant is expected to perform the tasks described above, including:

- Download from the FATF public website the 45 MERs published between 2014 and 17 April 2019 that have weak ratings for IO.2 and IO.6.
- Drafting of a comprehensive report that will include the clear identification, for each MER, of the factors that led to the weak rating(s) for IO.2 and/or IO.6. If the role of the FIU had an impact in the weak rating, the exact section(s) in the MER that would meet the agreed benchmarks must be clearly identified in the report.

### ***Qualifications for the Required Job***

The Consultant should have extensive knowledge of the international AML/CFT environment, as well as proven experience in the 4<sup>th</sup> Round of Mutual Evaluations conducted by assessors' bodies, preferably in the effectiveness assessment of IO.2 and IO.6. Recent work experience in a financial intelligence unit will be considered an asset.

### ***Timelines***

It is estimated that 24 working days will be needed for downloading the reports, conducting the review, drafting and submitting the final requested report. The timeline below is expected to be met by the successful candidate:

<b>No.</b>	<b>Activity</b>	<b>Working days (WD)</b>
<b>1.</b>	Consultant downloads all the MERs	<b>1WD</b>
<b>2.</b>	Consultant conducts the review, drafts and submits the requested report	<b>21WD</b>
<b>3.</b>	EGS sends comments of the report, to be provided by the Chair of the Membership, Support and Compliance Working Group	<b>2WD</b>

<b>4.</b>	Consultant finalizes and submits final version of the report	<b>2WD</b>
<b>5.</b>	Chair of the Membership, Support and Compliance Working gives final approval to the report	<b>3WD</b>

### ***Application Method***

All submissions must be addressed to the attention of Mr. IKRAM MUHAMMAD, HR Officer, Egmont Group of Financial Intelligence Units at [careers@egmontsecretariat.org](mailto:careers@egmontsecretariat.org). Please apply with the subject line: '**Consultancy Proposal – Trigger 3**'.

All proposals must be received by **Friday, December 13, 2019 (05:00PM Ottawa time)**.

### ***Contact Person***

Any questions regarding this *Request for Proposal* should be directed to Mr. Gonzalo Alvarado, Senior Officer, via email at [gonzalo.alvarado@egmontsecretariat.org](mailto:gonzalo.alvarado@egmontsecretariat.org)

### ***Proposals Must Contain***

- Approach to providing services
- Scope of Work
- Expected daily fee (in USD), considering the maximum of 24 working days.
- Qualifications and years of experience in mutual evaluation reports.